Member of the public 501
Dear Sir/Madam,

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

The project in question envisages the development of an offshore wind farm with a generating capacity of approximately 2 gigawatts. This would involve the installation of between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip. The proposed site encompasses a Windfarm Development Area of around 448 square kilometres, situated to the north-west of Islay and west of Colonsay. It lies approximately 21 kilometres from Iona and is in close proximity to the islands and coastal communities of the southern Hebrides.

The forthcoming sections detail the planning and environmental grounds for objection, framed within the statutory and policy context that governs the determination of these applications. It is imperative to emphasise that the onus lies entirely with the applicant to provide compelling and sufficient evidence that all relevant statutory tests and policy criteria are met. Objectors are not required to substantiate contrary claims. Upon examination of the evidence submitted, it is clear that the applicant has failed to meet this evidential burden. Consequently, I contend that consent for the proposed development should be refused.

1.1.1 Seascape, Landscape and Visual Effects

The visualisation materials submitted in support of the assessment exhibit inherent limitations that have a direct impact on the accuracy of the perceived scale and visual effects of the proposed development. These limitations mean that decision-makers and consultees cannot fully rely on the visual evidence as a precise representation of how the development will appear in situ. Consequently, there is a risk that the visual impact may be either underestimated or misinterpreted, which could affect the robustness of any conclusions drawn from these materials.

NatureScot’s visualisation guidance, which the applicant has adopted, explicitly recognises these constraints. It states that printed visualisations cannot fully replicate the scale experienced by a viewer in the field. Additionally, wireline drawings that are presented within the same panoramic projections share the limitations inherent in the accompanying photography. These drawings are technical renderings embedded within the visualisation and do not serve as independent corrections or enhancements to overcome the fundamental shortcomings of photographic representation.

Given these acknowledged technical and perceptual limitations, it is essential that the assessment’s reliance on these visual materials is appropriately tempered by an

understanding of their constraints. This ensures that decisions are not made solely on visualisations that cannot fully convey the real-world experience of the development's scale and presence within the landscape. In light of this, further consideration or supplementary means of assessment may be necessary to provide a more comprehensive understanding of the visual impact.

The proposed development would introduce aviation and navigation lighting to a currently unlit sea horizon, resulting in a permanent alteration to the character of the night-time seascape throughout the stated 35-year operational life. This change represents a significant modification to the visual environment, as the existing natural darkness of the seascape would be replaced by artificial illumination that is visible from surrounding areas. The introduction of such lighting not only alters the aesthetic qualities of the seascape but also establishes a new baseline condition for the area's nocturnal character during the lifetime of the project.

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

There remains significant uncertainty regarding the proposal's compliance with key planning policies designed to safeguard landscape and seascape interests. The effects identified engage several provisions, notably NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. Critically, the applicant has failed to demonstrate that its conclusions about the scale of these acknowledged effects align with its own assessment methodology. Moreover, no satisfactory evidence has been provided to confirm that the proposal complies with policies aimed at protecting nationally important landscapes and seascapes. On this basis, it cannot be concluded that the proposal meets the necessary policy requirements.

1.1.2 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment acknowledges that the cultural significance of the affected heritage assets is derived from a complex interplay of qualities, including pilgrimage routes, arrival by sea, movement through a living cultural landscape, and the interrelationships between monuments, spirituality, and the surrounding landscape and seascape. These qualities are primarily experienced dynamically, through movement, rather than from fixed viewpoints. However, the mitigation measures proposed appear to focus predominantly on visual impacts from selected static vantage points, which risks underrepresenting the broader experiential and cultural landscape values identified in the baseline.

This concern is reinforced by Historic Environment Scotland's consultation responses, as recorded within the application, which specifically requested additional

viewpoints to ensure these wider cultural qualities are properly captured. The omission of such viewpoints in the applicant's assessment suggests an incomplete understanding of the heritage assets' significance and potentially inadequate mitigation of impacts on the overall cultural landscape. For a robust and comprehensive evaluation, it is essential that the assessment fully incorporates the living, dynamic nature of the heritage setting, beyond isolated visual perspectives.

The heritage impact conclusions presented rely fundamentally on the findings of the landscape assessment. However, when the landscape effects are understated, as previously demonstrated, this understatement directly transfers to and compromises the accuracy of the heritage conclusions that are constructed upon them. In this regard, the mitigation measures proposed cannot be fully trusted to address the true extent of harm, since their basis—the landscape assessment—is itself deficient.

This reliance on an incomplete landscape evaluation weakens the overall credibility of the heritage impact appraisal. If the landscape effects are not accurately assessed and articulated, the subsequent heritage conclusions inevitably fail to reflect the genuine magnitude of impact on heritage assets. Consequently, the robustness of the planning decision-making process is undermined, and the potential for effective mitigation is diminished. This fundamental flaw calls for a reassessment of the landscape evidence before any definitive heritage impact conclusions are accepted.

1.1.3 Effects on Island Communities, Tourism and the Local Economy

The applicant's own baseline assessments acknowledge that the island communities affected by the proposed development rely heavily on visitors who are drawn specifically by the distinctive qualities of the area. These include the landscape, seascape, cultural heritage, tranquillity and remoteness. Such attributes are fundamental to the visitor appeal and, by extension, the economic foundation of these island communities.

Any alteration to these intrinsic qualities directly undermines the economic base upon which these communities depend. This, in turn, jeopardises the provision of local services, threatens population retention, and ultimately compromises the long-term viability and sustainability of the island settlements. The proposal, therefore, poses a significant risk to the fundamental economic and social sustainability of these island communities.

The applicant's own consultants acknowledge that habitability represents a potentially significant pathway through which the proposed development could impact island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 is conducted at a regional scale, focusing in detail on port communities but omitting a comparable place-based analysis for the island communities directly facing the development. This assessment nonetheless concludes that these island communities exhibit low sensitivity to tourism effects.

This approach is problematic because small island economies are not accurately represented by regional averages. Such economies are typically concentrated in sectors that are highly vulnerable to changes in the attributes attracting visitors.

Furthermore, reliance on increasing visitor numbers does not diminish this sensitivity; rather, it intensifies the dependence on the very qualities that may be compromised by the development. Consequently, the conclusion of low sensitivity, derived without specific place-based analysis, lacks evidential support and amounts to an unsubstantiated assumption. Therefore, the socio-economic assessment methodology employed is insufficient to fully understand or mitigate the impacts on island communities.

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

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

1.1.4 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, with surrounding waters that support notable populations of seabirds, marine mammals, and basking sharks. The proposed project would bring construction, operational, and decommissioning activities on a very large scale, extending over several decades, thereby introducing sustained pressures on these ecologically sensitive environments.

Given the recognised ecological importance and sensitivity of the site and its adjacent marine habitats, the potential for significant adverse environmental effects from the development is substantial. The presence of protected species and priority features necessitates careful consideration of the impacts that such large-scale and long-term activities may impose on biodiversity and habitat integrity.

Considerable uncertainty remains regarding the applicant's ability to meet the stringent statutory tests designed to safeguard internationally important habitats and species. Despite the submission of derogation documents intended to address these requirements, the evidence put forward fails to provide the necessary assurance that these critical ecological protections will be upheld. This lack of demonstrable certainty calls into question the soundness of the application in fulfilling its legal obligations.

Given this unresolved uncertainty, the case for granting consent is fundamentally undermined. Without clear and conclusive evidence that the statutory tests have

been satisfied, the proposed development risks causing harm to protected ecological features of international importance. In light of these concerns, it is appropriate to conclude that the application should not be approved.

1.1.5 Further Comments

I don't believe that the harms of the development are outweighed by the benefits to the people of Scotland, particularly those living in the area directly affected by the development.

1.1.6 Summary

The proposal for the MachairWind Offshore Wind Farm has not been substantiated with sufficient evidence to satisfy the relevant statutory and policy requirements governing its determination. The applicant’s own evaluation acknowledges considerable impacts on landscapes designated at the national level, as well as on the cultural heritage and communities along this coastal region. However, published analyses of the applicant’s documentation reveal that these impacts have been significantly underestimated, and crucially, the mandatory heritage assessment has not been completed. Furthermore, while the effects on the island communities involved were identified, they have not been subject to any formal assessment. The ecological criteria required by legislation remain unproven as achievable, and it should be noted that only a portion of the overall project has been submitted for consideration by the Scottish Ministers.

In light of these deficiencies, it is respectfully submitted that the Scottish Ministers should refuse consent for the MachairWind Offshore Wind Farm proposal, as well as decline the associated marine licence application.

Should the Ministers consider an alternative course and not refuse consent outright, it is requested that they require the submission of additional environmental information and enhanced visual representations. The determination of the applications should be deferred until after a public inquiry is conducted, allowing for a comprehensive examination of the issues raised in this objection. Regardless of the final decision, it is further requested that the Ministers explicitly address and set out their conclusions regarding the impacts on cultural heritage and on the affected island communities in their stated reasons.

Yours faithfully,

[Redacted]

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

Member of the public 502
Dear Sir/Madam,

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

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

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

1.1.7 Seascape, Landscape and Visual Effects

The applicant’s written methodology, as set out in Appendix 16.1, notably lacks a defined distance threshold beyond which major effects are deemed to cease. However, an independently prepared Evidence Note, relying entirely on the applicant’s Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern across all three assessment streams. It identifies that no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of receptor sensitivity or the extent of visibility. Furthermore, the applicant’s own documents acknowledge the influence of distance in their judgements. For example, the assessment of a coastal area over 30 kilometres away qualifies the scale of change as small due to viewing distance. The Landscape Character synthesis similarly describes a High magnitude of effect within roughly 20 kilometres, Medium between about 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types.

This reliance on distance as a moderating factor has significant implications for the robustness of the assessment conclusions. The systematic moderation of magnitude at distances coinciding with the location of the most sensitive designated landscapes means that the inputs to the protective tests are understated. Consequently, the findings presented do not reliably represent the true effects that the Scottish Ministers are being asked to consent. This methodological shortcoming calls into

question the accuracy and reliability of the predicted effects and suggests that the assessment underestimates potential harm to sensitive receptors at critical distances.

The applicant relies on NatureScot's visualisation guidance, which explicitly recognises that printed visualisations cannot fully capture the scale perceived by a viewer in the field. Furthermore, the wireline drawings included within the panoramic projections inherit the same limitations as the accompanying photography; they constitute technical renderings within the visualisation rather than independent corrections to it. This inherent constraint means that any visual evidence must be understood as a representation with acknowledged perceptual and technical boundaries, underscoring the need for cautious interpretation in the planning assessment.

The introduction of aviation and navigation lighting to a previously unlit sea horizon would result in a permanent alteration of the night-time seascape character for the entire 35-year operational life of the development. This change is not a minor or temporary effect; it would fundamentally alter the visual experience of the seascape during night hours. Furthermore, the 35-year operational timeframe does not mitigate the policy implications of this harm. Granting consent to this development effectively signifies an acceptance that this seascape is appropriate for wind farm use despite the permanent change in its night-time character. In conclusion, the impact of lighting on the seascape is significant and enduring, and any approval of the scheme must acknowledge the irreversible nature of this seascape transformation.

1.1.8 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of the effects on the setting of historic assets relies explicitly on the methodology recognised by Historic Environment Scotland, a framework developed and refined through consultation with that body. This methodology mandates a thorough evaluation of whether changes to setting affect the contribution that setting makes to the cultural significance of heritage assets, and critically, whether the integrity of that setting is adequately retained. It is made clear within the methodology that visual change alone should not be directly equated with adverse impact, thereby distinguishing between mere visibility and substantive harm to significance.

However, an independent Methodological Audit, produced in support of community objections and based solely on the applicant's own Appendix 14.3, identifies a serious deficiency in the operational assessment. While the assessment identifies heritage attributes such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it fails to demonstrate how the integrity of setting has been evaluated in accordance with the applicant's accepted methodology. The assessment primarily describes visual change and then proceeds to conclude that the integrity of setting is adequately retained without presenting the crucial evaluative step required by the methodology. This omission undermines the reliability of the applicant's conclusions regarding heritage impacts, as the essential analytical process—connecting observed changes to their effect on cultural significance and setting integrity—is not evidenced in any of the worked examples examined by the Audit.

1.1.9 Effects on Island Communities, Tourism and the Local Economy

The practical consequence of the applicant's flawed socio-economic assessment methodology is a significant risk that the specific impacts on island communities will be misunderstood and inadequately mitigated. The applicant's consultants themselves identified habitability as a potentially significant pathway for effects on these communities, yet no targeted assessment of island habitability was conducted. Instead, the socio-economic evaluation in Chapter 18 focuses on regional-level analysis, detailed only for port communities, and fails to provide an equivalent place-based assessment for the islands directly facing the proposed development. Despite this omission, the assessment concludes that island communities exhibit low sensitivity to tourism effects, a conclusion unsupported by detailed evidence.

It is important to recognise that small island economies cannot be accurately represented by regional averages. Their economic structures are heavily concentrated in sectors most vulnerable to fluctuations in the qualities that attract visitors. Far from reducing sensitivity, reliance on increasing visitor numbers amplifies dependence on these critical qualities, which are precisely those at risk from the proposed development. Therefore, any assertion of low sensitivity to tourism impacts, made without detailed, place-specific analysis, constitutes an unsubstantiated assumption rather than a reasoned conclusion.

Given these shortcomings, the socio-economic assessment fails to provide a robust basis for understanding or addressing the specific vulnerabilities of island communities. Without proper, place-based analysis, the potential socio-economic consequences for these communities remain unclear and inadequately accounted for within the planning process. Accordingly, the application should be reconsidered to ensure that the assessment methodology appropriately reflects the unique sensitivities of island economies and supports effective mitigation strategies.

1.1.10 Ecology, Biodiversity and Habitats Regulations

The applicant has not demonstrated that the statutory tests required to protect internationally important habitats and species can be satisfied. This conclusion is drawn from the evidence submitted, including the applicant's own derogation documents, which reveal an insufficient degree of certainty regarding compliance. Without clear assurance that these legal protections are upheld, the application fails to meet the necessary statutory criteria, thereby undermining the justification for granting consent.

1.1.11 Cumulative and In-Combination Effects

The assessment before the Scottish Ministers considers only a portion of the proposed development, notably excluding the export cable corridor and onshore transmission works, which are essential for the wind farm's operation. This segmentation results in a fragmented evaluation where the cumulative effects of the entire project are never jointly examined. Instead, significant components are left to separate, subsequent consenting processes following the principal decision. Such an approach fundamentally conflicts with established legal principles, as confirmed in the Raeshaw Farms case, which mandates that a project must be assessed in its

entirety rather than being artificially divided into smaller parts with seemingly lesser individual impacts. This incomplete assessment method undermines the integrity of the decision-making process and fails to provide a comprehensive understanding of the project's overall environmental and operational implications.

The cumulative impact assessment presented in the Environmental Impact Assessment significantly underestimates the true combined effects of the proposed development alongside existing, consented, and foreseeable projects. This underestimation arises directly from flawed baseline assessments which serve as the foundation for the cumulative analysis. When the initial landscape, heritage, and socio-economic evaluations downplay the severity of effects, the subsequent cumulative assessment inevitably reflects this reduced baseline, resulting in a misleadingly low estimation of overall impacts.

This methodological shortcoming is critical because the cumulative assessment does not independently verify or adjust for the understated baseline conditions. Instead, it relies entirely on conclusions drawn from other sections of the Environmental Impact Assessment. Therefore, any deficiencies or inaccuracies in the initial assessments are perpetuated and amplified in the cumulative analysis. This approach fails to capture the true scale and extent of combined effects, thereby compromising the reliability of the assessment and any decisions based upon it.

In summary, the cumulative impact assessment as it stands is fundamentally unreliable and does not provide an accurate account of the total effects of the development in context. Given the clear dependency on flawed baseline data, the cumulative effects are materially understated. It is essential that these shortcomings be addressed to ensure a robust, transparent, and comprehensive evaluation of all impacts before any planning decisions are made.

1.1.12 Public Engagement, Site Selection and Environmental Information

The applicant requests that Scottish Ministers accord significant weight to the site-selection process; accordingly, the quality of public participation within that process is directly material. Evidence highlights that deficiencies in participation at both the plan and site-selection stages have persisted into the application phase. The application documentation comprises thousands of pages of technical material, and the consultation period coincided with the busiest months for island communities, when residents are engaged continuously through the visitor season and access to specialist advice is limited. In contrast, the applicant has had years to prepare and considerable professional and financial resources to support their case.

Moreover, GEN 18 of the National Marine Plan and the principles of effective public participation enshrined in the Aarhus Convention require that those affected have a realistic opportunity to engage in decisions of such magnitude. The conditions under which the affected communities have been expected to respond fall short of this standard. Therefore, Ministers are urged to bear these shortcomings firmly in mind when weighing the representations made. The inadequacies in both timing and accessibility of consultation undermine the legitimacy of the site-selection process and the broader decision-making framework.

1.1.13 Effects on Local Area

The practical consequence of the applicant's distance-based approach to environmental impact assessment is a systematic underestimation and discounting of significant effects on sensitive receptors located beyond approximately 20 kilometres. This methodology results in a moderated magnitude of change assigned to these receptors, despite their acknowledged sensitivity. Critically, the communities residing in these areas have not been afforded any place-specific assessment of the impacts they are likely to experience. Taken together, these factors demonstrate a consistent pattern within the applicant's assessment whereby effects on distant yet highly sensitive receptors are diminished in importance solely due to their distance from the site. Such an approach undermines the integrity and comprehensiveness of the environmental impact assessment by failing to fully recognise and evaluate the true extent of potential effects on these communities. Consequently, the assessment does not provide a robust or reliable basis for decision-making regarding the wider environmental and social consequences of the proposed development.

1.1.14 Personal Observations

In addition to the planning matters above, I am personally concerned because: This proposal affects the community on Mull and the other affected islands as a whole. Although I am largely in favour of wind farms, there has been insufficient communication and mediation with the community.
I feel that the argument for placing these turbines close to these inhabited islands is weak and there are many miles of uninhabited coastline that could be considered instead. I would like to see a compromise agreed by the affected communities resulting in more sensitive siting of the turbines so that they cause less impact

Based on my own local knowledge, I also wish to highlight that: From a wildlife perspective, unfortunately I feel the necessity for greener energy outweighs these concerns

Finally, I would also ask the Scottish Ministers to consider: Green energy is vital but the communities affected need to be respected and further compromise should be sought to alleviate their concerns. Moving the turbines further along the coast could achieve this. We want people to support green energy projects so every effort should go into ensuring as much agreement on all sides as possible.

1.1.15 Summary

The proposal for the MachairWind Offshore Wind Farm fails to demonstrate compliance with the relevant statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the local communities and heritage along this coastal region. Furthermore, independent reviews of the applicant's documentation reveal that the extent of these impacts has been underestimated. Crucially, the necessary heritage assessment has not been undertaken. Additionally, while the effects on the island communities involved were identified, no formal assessment of these impacts has been completed. The ecological criteria applicable

to the project have also not been shown to be achievable. It should be noted that Scottish Ministers are currently considering only part of the project.

In light of these deficiencies, I respectfully urge Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to reject the related marine licence application. Should the Ministers decide against refusal, I request that they require the submission of further environmental information alongside enhanced visual representations of the project. Moreover, I contend that the applications should not be determined without the benefit of a public inquiry, during which the concerns raised in this objection can be thoroughly examined. Regardless of the final decision, I also seek a clear and explicit statement from the Ministers addressing the impacts on cultural heritage and the affected island communities within their decision reasons.

Yours faithfully,

[Redacted]

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

Member of the public 503
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, identified by application numbers 00012385 for consent under section 36 of the Electricity Act 1989 and 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications, lodged by MachairWind Limited (ScottishPower Renewables), seek authorisation for an offshore wind installation with an output capacity of approximately 2 gigawatts. The development envisages between 91 and 144 turbines, each reaching up to 335 metres to blade tip, situated within a designated Windfarm Development Area spanning about 448 square kilometres of marine environment located north-west of Islay, west of Colonsay, and approximately 21 kilometres from Iona, in proximity to the southern Hebridean islands and adjacent coastal settlements.

I request that this letter be formally recorded as an objection, that I be registered accordingly as an objector, and that I receive notification of the final determination of these applications.

The following sections detail the planning and environmental grounds underpinning my opposition, framed by the statutory and policy context applicable to these proposals. It is imperative to emphasise that the responsibility lies with the applicant to provide sufficient and robust evidence demonstrating compliance with all relevant planning and environmental tests. Objectors are not obliged to establish contrary evidence. On the basis of the considerations outlined herein, it is evident that the applicant has failed to meet this evidential threshold and, consequently, the applications should be refused consent.

1.1.16 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989, which require the applicant to have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant is obliged to take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The evidence confirms that these statutory requirements have not been adequately addressed.

Schedule 9 explicitly mandates that both the applicant and the Scottish Ministers, in determining the application, must have regard to these duties. The failure to demonstrate compliance, coupled with identified deficiencies and omissions in the application’s consideration of these statutory obligations, constitutes a direct conflict with the applicable legal and policy framework. Such shortcomings are material and weigh decisively against the granting of consent. The absence of sufficient evidence that reasonable mitigation steps have been taken further exacerbates this failure.

In summary, the application does not meet the statutory criteria under Schedule 9 of the Electricity Act 1989, and this fundamental deficiency must be given significant weight in the determination process. The statutory duties are clear and mandatory,

and the application's failure to comply with them undermines its legitimacy and justifies refusal.

The marine licence application under Part 4 of the Marine (Scotland) Act 2010 fails to demonstrate compliance with the statutory requirements and the relevant policies of Scotland's National Marine Plan. The application does not adequately address the General Policies critical to this proposal, including GEN 4 on Co-existence, GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 and paragraph 4.85 on Cumulative Impacts. The absence of clear evidence showing conformity with these policies undermines the statutory assessment process required for authorisation decisions.

Given that compliance with these policies has not been demonstrated, and the evidence reveals deficiencies and omissions in the application's consideration of the applicable legal and policy framework, these failures weigh decisively against the granting of consent. The application's shortcomings in addressing the National Marine Plan's requirements constitute a fundamental procedural and substantive defect that precludes lawful authorisation under the Marine (Scotland) Act 2010. Accordingly, the marine licence should be refused.

The proposal under consideration fails to demonstrate compliance with the key policies of National Planning Framework 4 (NPF4), specifically Policies 3, 4, 7, and 11, which are directly engaged by this development. NPF4 is a significant material consideration that must be applied in conjunction with the relevant statutory duties and legislative requirements. The absence of demonstrated compliance with these policies, and the presence of identified deficiencies and omissions in the submitted evidence, weigh decisively against the granting of consent.

Policy 3 (Biodiversity) requires that developments protect and enhance biodiversity. The application fails to provide sufficient evidence that biodiversity will be maintained or improved. There is no clear demonstration that the proposal avoids harm to protected species or habitats, nor that any biodiversity net gain will be achieved. This omission is critical, given the statutory duties to conserve biodiversity under the Environment Act 2021 and related legislation.

Policy 4 (Natural Places) mandates the safeguarding of natural places and landscapes. The proposal does not adequately assess or mitigate its impact on the natural environment. The evidence lacks a comprehensive evaluation of effects on designated natural sites or landscape character, and no effective measures are proposed to prevent degradation. This failure conflicts with the policy's objective to maintain the integrity and quality of natural places.

Policy 7 (Historic Assets and Places) requires that developments conserve and enhance the historic environment. The application does not sufficiently address the potential impacts on designated or non-designated heritage assets. The absence of a thorough heritage impact assessment or appropriate mitigation measures contravenes the policy's requirements and statutory duties under the Planning (Listed Buildings and Conservation Areas) Act 1990.

Policy 11 (Energy) sets out criteria for energy developments, including the need to demonstrate compliance with environmental and social safeguards. The proposal does not provide adequate evidence that it meets these criteria. There is a lack of clarity on how the development aligns with energy policy objectives while respecting environmental constraints, resulting in a failure to satisfy Policy 11.

In summary, the proposal's failure to demonstrate compliance with Policies 3, 4, 7, and 11 of National Planning Framework 4, combined with the identified deficiencies, omissions, and conflicts with the applicable legal and policy framework, constitutes a significant planning concern. These matters weigh against the granting of planning consent.

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

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

The absence of a robust and compliant EIA and HRA undermines the statutory framework designed to protect the environment and European designated sites. Without these assessments, the determining authority cannot lawfully conclude that the proposal will not have adverse environmental effects or that it meets the stringent requirements of the Habitats Regulations. This failure to provide adequate environmental information and statutory assessment is a direct conflict with the applicable legal and policy framework.

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

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

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

procedural and substantive deficiency. The Islands (Scotland) Act 2018 explicitly requires that the interests of island communities be taken into account and given due weight during the decision-making process. This statutory obligation is not a discretionary matter but a legal requirement that must be demonstrably fulfilled.

In this case, there is no evidence that the proposal has adequately addressed or incorporated the specific interests of island communities. The absence of such consideration constitutes a clear omission and a failure to comply with the applicable legal framework. Where compliance with the Islands (Scotland) Act 2018 has not been demonstrated, or where the evidence reveals deficiencies or omissions in this regard, these shortcomings must weigh against the granting of consent.

Accordingly, the proposal's failure to properly consider and give due weight to the interests of island communities as required by the Islands (Scotland) Act 2018 represents a material conflict with the statutory framework and is a compelling reason to refuse planning permission.

The applicant has failed to discharge the fundamental responsibility of demonstrating compliance with all relevant statutory duties, planning policies, and environmental assessment requirements. As established, the evidential burden rests squarely on the applicant to provide robust, objective, and proportionate evidence confirming that every applicable legal and policy framework has been satisfied. In this case, the submission lacks such comprehensive and convincing evidence, thereby falling short of the necessary standard to justify approval.

Moreover, the evidence presented reveals clear deficiencies and omissions in addressing the full scope of statutory and policy obligations. These gaps undermine confidence that the proposal aligns with the established legal and planning frameworks. Where compliance is not demonstrated, or where conflicts with the applicable requirements are identified, the weight of planning judgment must be directed against the granting of consent. The absence of adequate proof of conformity with these essential criteria is a decisive factor that cannot be overlooked.

In conclusion, the applicant's failure to meet the evidential burden required to prove compliance with all relevant legal and policy frameworks constitutes a fundamental flaw in the proposal. This deficiency alone justifies refusal, as it directly contravenes the established principle that consent should only be granted where full compliance is demonstrably achieved. Accordingly, the application should be refused on the basis that the applicant has not fulfilled the necessary legal and policy requirements.

1.1.17 Conflict with National Planning Framework 4 and the Development Plan

There is considerable uncertainty regarding the proposal's compliance with the impact criteria set out in NPF4 Policy 11, which is pivotal to the policy's overall support for renewable energy development. While Policy 11 endorses such development, this support is conditional upon adherence to specific impact tests, notably those relating to effects on communities, landscapes, seascapes, and other sensitive receptors as outlined in clauses 11(c), 11(d), and 11(e).

The proposal appears to conflict with these essential criteria. It would result in significant adverse effects on nationally designated landscapes and seascapes, which are afforded high levels of protection under the policy. Furthermore, the evidence submitted fails to demonstrate that the cultural significance of scheduled monuments and their settings would be adequately safeguarded, nor that the interests of island communities would be properly protected. These shortcomings raise serious doubts about the proposal's acceptability under the policy framework.

Moreover, the ecological assessments provided do not convincingly establish that the necessary environmental tests can be met. In light of these unresolved concerns, the proposal does not satisfy the impact criteria integral to NPF4 Policy 11, thereby undermining the policy's intended balance between enabling renewable energy and protecting key environmental and cultural assets.

The proposal fails to comply with multiple policies within the National Planning Framework 4 that protect nationally important landscapes, heritage assets, and biodiversity. Policy 11 operates in conjunction with Policy 4(c) and 4(d), which safeguard National Scenic Areas and nationally important landscapes from significant adverse effects on their designated qualities; Policy 7, including 7(h) concerning scheduled monuments and 7(c) and 7(d) relating to the setting of historic assets; and Policy 3 on biodiversity. The submitted evidence demonstrates that the proposal would result in significant adverse impacts on nationally designated landscapes and seascapes. Furthermore, it has not been shown that the cultural significance of scheduled monuments and their settings would be preserved, nor that island communities would be adequately protected. Additionally, the ecological assessments required under Policy 3 have not been satisfactorily met. Taken together, these failures establish clear conflicts with the relevant NPF4 policies intended to safeguard designated assets.

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

1.1.18 Seascape, Landscape and Visual Effects

The applicant's written methodology, as set out in Appendix 16.1, does not specify any distance threshold beyond which major effects cease. However, an independently prepared Evidence Note, relying solely on the applicant's Chapter 16 and Appendices 16.1 to 16.3, identifies a consistent pattern across all three assessment streams. This pattern shows that no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of its sensitivity or the extent of visibility. This observation directly stems from the applicant's own documents, which

acknowledge the influence of distance on their judgements. For example, an assessment of a coastal area over 30 kilometres away concludes that, due to the viewing distance, the scale of change is small. Furthermore, the Landscape Character synthesis within the applicant's materials describes a High magnitude of effect within roughly 20 kilometres, Medium between approximately 20 and 30 kilometres, and Low beyond around 30 kilometres for some landscape types.

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

The applicant's submission includes visualisation materials prepared in accordance with NatureScot's established guidance. This guidance recognises that printed visualisations inherently cannot fully replicate the scale and spatial experience perceived by a viewer in the field. Consequently, while these visualisations provide a useful indicative representation, they are subject to inherent technical and perceptual constraints.

Further, the wireline drawings incorporated within the panoramic projections share the same limitations as the accompanying photographic images. These wireline drawings serve as technical renderings within the overall visualisation framework rather than as independent measures to correct or enhance the photographic content. As such, they should be interpreted as complementary rather than definitive visual evidence.

In light of these acknowledged limitations, it is important that decision-makers consider the visualisation materials as indicative aids rather than exact representations. The visual impact assessment must therefore be balanced with on-site observations and other contextual factors to fully understand the proposed development's visual effects.

The applicant's evidence acknowledges that the proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration of the night-time seascape character throughout the stated 35-year operational life. This fundamental change would transform the visual experience of the seascape after dark, introducing new and continuous light sources where none presently exist.

Furthermore, the temporal limitation of 35 years does not mitigate the policy implications of this harm. Consent for the development would signify a policy judgement that the seascape is appropriate for wind farm use, thereby accepting the permanent alteration to its character. This recognition underscores the lasting significance of the lighting effects on the night-time seascape, beyond the operational timeframe.

The proposal fails to comply with the requirements of key planning policies designed to safeguard landscape and seascape interests. Specifically, the effects identified engage NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. Despite recognising these effects, the applicant has not demonstrated that its conclusions regarding their scale are consistent with its own assessment methodology. Furthermore, no evidence has been provided to show compliance with the policies protecting nationally important landscapes and seascapes. On this basis, it is clear that the proposal does not meet the necessary policy standards and should not be supported.

1.1.19 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of heritage impacts claims to follow Historic Environment Scotland's established methodology, which rightly distinguishes between mere visual change and actual adverse effects on the cultural significance of historic assets. This methodology requires a thorough evaluation of whether alterations to the setting compromise the contribution that setting makes to an asset's cultural value, including an explicit judgment on whether the integrity of that setting is preserved. By focusing on the nuanced relationship between setting and significance rather than simply on changes in visibility or landscape character, the methodology aims to ensure that assessments are both robust and meaningful in their conclusions.

However, a detailed Methodological Audit, which carefully scrutinises the applicant's Appendix 14.3, reveals a critical shortcoming in the operational assessment. While the applicant's report identifies relevant heritage attributes and describes various visual factors—such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—it fails to carry out the essential evaluative step required by its own cited methodology. Specifically, it does not demonstrate how the integrity of the setting has been assessed in line with the prescribed approach. The Audit finds no evidence within the examined examples that the applicant has moved beyond describing visual effects to properly assess their impact on the cultural significance or integrity of the setting. This omission fundamentally undermines the reliability of the applicant's conclusions regarding heritage impacts, calling into question the validity of the overall assessment.

The applicant's own baseline assessment acknowledges that the cultural significance of the affected heritage assets arises from a complex interplay of qualities, including pilgrimage, arrival by sea, and movement through a living cultural landscape. It recognises the importance of relationships between monuments, spirituality, and the surrounding landscape and seascape, all of which are experienced dynamically rather than through fixed viewpoints. This nuanced understanding underscores that heritage value extends beyond isolated features to encompass experiential and spatial dimensions that contribute to the overall cultural landscape.

Historic Environment Scotland's consultation responses, as recorded within the application documentation, highlight concerns that the applicant's assessment may not adequately capture these broader qualities. They specifically requested the inclusion of additional viewpoints to ensure a fuller representation of the cultural

landscape's experiential aspects. This indicates a potential shortfall in the baseline assessment and suggests that the heritage impact appraisal may underestimate effects on the wider cultural and experiential context. Consequently, the assessment should be revisited to incorporate these broader perspectives, thereby providing a more comprehensive understanding of heritage impacts.

The mitigation measures proposed rely heavily on the landscape assessment, yet this assessment significantly understates the landscape effects. Such understatement directly compromises the heritage impact conclusions, as these conclusions are contingent upon the landscape findings. Consequently, any deficiencies in the landscape evaluation inherently diminish the credibility of the heritage conclusions derived from it. This interdependence highlights a fundamental flaw in the assessment methodology and calls into question the reliability of the overall heritage impact appraisal.

The application fails to demonstrate compliance with NPF4 Policy 7, specifically subsections (h) concerning scheduled monuments and (c) and (d) regarding their setting, as well as GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Critically, the applicant has not provided the necessary assessment to show that the cultural significance of internationally and nationally important heritage assets and their settings would be safeguarded. Consequently, the Scottish Ministers lack the evidence required to conclude that these heritage assets would be protected. On this basis, the proposal does not meet key policy requirements for heritage protection and should therefore be refused.

1.1.20 Effects on Island Communities, Tourism and the Local Economy

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

The practical consequence of the applicant's flawed socio-economic assessment is a significant risk that the impacts on island communities will be misunderstood and inadequately mitigated. Despite the identification by the applicant's own consultants that habitability represents a potentially significant pathway affecting these communities, no specific assessment of habitability on the affected islands was undertaken. Instead, Chapter 18 confines its analysis largely to regional-level considerations, focusing on port communities in detail while neglecting a place-based assessment of the island communities directly facing the proposed development. This gap results in the unsupported conclusion that these island communities possess low sensitivity to tourism effects.

Such a conclusion is fundamentally flawed because small island economies differ substantially from regional averages. Their economic structures are concentrated in sectors most vulnerable to changes in the qualities that attract visitors. Rather than

diminishing sensitivity, dependence on increasing visitor numbers intensifies the risk to these communities by deepening their reliance on the very attributes potentially threatened by the proposal. Without a detailed, location-specific analysis, the assertion of low sensitivity amounts to an assumption, not an evidence-based finding.

In light of these points, the socio-economic assessment as presented fails to provide an adequate or reliable basis for understanding or mitigating impacts on island communities. Any decision-making premised on such an incomplete evaluation risks overlooking critical vulnerabilities, thereby undermining effective planning and protection of these sensitive island environments. It is essential that a thorough, place-based socio-economic assessment be undertaken to properly inform the planning process.

The proposal fails to comply with essential planning and statutory requirements concerning island communities, resulting in inadequate consideration of their interests. Specifically, it neglects the obligations set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions be based on robust socio-economic evidence and adopt a precautionary approach when such evidence is insufficient. Furthermore, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 explicitly require that the interests of island communities be properly assessed and given due weight through meaningful engagement from the earliest stages of a proposal to its conclusion. Despite recognising that island communities warrant particular scrutiny, the applicant has not undertaken the necessary assessment to understand the potential effects on these communities. Consequently, it has not demonstrated that the proposal aligns with the principles of sustainable island communities, nor has it discharged the statutory duties owed to them. In light of this, the proposal does not meet the required planning and statutory standards for protecting island communities and should not be supported.

1.1.21 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, with surrounding waters supporting important populations of seabirds, marine mammals, and basking sharks. Introducing construction, operation, and decommissioning activities on such a large scale and over several decades poses a substantial risk of significant adverse environmental effects to this ecologically sensitive marine environment.

The submission of a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan by the applicant indicates an acknowledgment that the proposed development may have adverse effects on the North Colonsay and Western Cliffs Special Protection Area, specifically concerning the guillemot population. Such documents are typically prepared when it cannot be ruled out that the integrity of a protected site might be compromised. This approach underscores the applicant’s recognition that the Scottish Ministers might reach a different conclusion regarding potential adverse effects, thereby necessitating these precautionary measures. The inclusion of these documents is therefore a significant aspect of the application, reflecting the applicant’s attempt to address and mitigate possible impacts under the relevant derogation provisions.

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

The practical consequence of the applicant's failure to demonstrate compliance with statutory tests is that the application cannot lawfully proceed to approval. The evidence submitted, including the applicant's own derogation documents, reveals a fundamental shortcoming in meeting the legal requirements designed to protect internationally important habitats and species. These statutory tests are established to ensure that any potential adverse impacts on critical ecological features are properly assessed and, where necessary, mitigated or avoided. However, the applicant's documentation fails to provide the necessary degree of certainty that these tests can be satisfied. Without this assurance, the proposed development poses an unacceptable risk to internationally designated ecological assets. Consequently, the application does not fulfil the statutory obligations and should not be granted consent.

1.1.22 Cumulative and In-Combination Effects

There is significant uncertainty surrounding the current assessment approach for the proposed development, arising from the fact that only a portion of the project is presently before the Scottish Ministers. Crucially, the export cable corridor and the onshore transmission works—without which the wind farm cannot function—have been deferred to subsequent applications. This fragmentation means that the full range of impacts associated with the entire project are never evaluated concurrently, leaving a considerable gap in the understanding of its cumulative effects.

This piecemeal consideration is fundamentally at odds with established legal principles governing environmental assessment. The courts, as reaffirmed in the Raeshaw Farms case, have made clear that a project must be assessed in its entirety rather than being artificially segmented into smaller parts whose individual impacts appear less significant. By deferring key components of the development, the current process effectively circumvents comprehensive scrutiny, undermining the integrity of the decision-making framework.

In light of these concerns, it is essential that the assessment be reconsidered to ensure that all integral elements of the project are examined collectively. Only through such an approach can the Scottish Ministers properly evaluate the full

environmental and planning implications, thereby upholding both legal requirements and sound planning practice.

The applicant's Environmental Impact Assessment (EIA) forms the foundation for the cumulative impact assessment presented in the proposal. This approach inherently relies on the conclusions drawn in the separate landscape, heritage, and socio-economic assessments. However, it is apparent that these underlying assessments have understated the magnitude of effects in each respective area. Such understatement consequently results in the cumulative assessment being founded on a diminished baseline, which does not fully reflect the true environmental and social context prior to the proposed development.

Because the cumulative assessment builds upon this reduced baseline, the combined effects of the current proposal alongside other existing, consented, and foreseeable developments are similarly underestimated. This means that the overall impact on the environment and communities within the area is likely greater than that reported. The failure to capture the full extent of these combined effects undermines the reliability of the cumulative impact assessment and may lead to inadequate mitigation measures being proposed.

Given the importance of an accurate and comprehensive understanding of cumulative effects in planning decisions, this underestimation raises concerns regarding the robustness of the environmental appraisal. It is essential that baseline assessments accurately reflect the existing conditions to ensure that cumulative impacts are fully and fairly evaluated. Without this, the decision-making process may not fully consider the true scale of change resulting from the proposal when combined with other developments, potentially compromising the sustainability objectives of the planning framework.

The applicant's submission fails to comply with GEN 21 and paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), as well as the Environmental Impact Assessment Regulations concerning project splitting. Specifically, the applicant has not demonstrated that the cumulative and in-combination effects of the proposal, nor the effects of the project as a whole, have been reliably identified and assessed. This omission raises significant concerns regarding the adequacy of environmental assessment. It is therefore requested that the decision-making process explicitly addresses the treatment of the deferred works to ensure full compliance with the relevant policies and regulatory requirements.

1.1.23 Public Engagement, Site Selection and Environmental Information

The practical consequence of the deficiencies in public participation during the consultation process is a fundamental undermining of the legitimacy of the site-selection exercise. The applicant requests that Scottish Ministers place significant weight on the site-selection process; however, this process has been compromised by inadequate opportunities for meaningful community engagement. The consultation coincided with the busiest months for island residents, who are occupied by continuous work throughout the visitor season, limiting their capacity to engage effectively. Meanwhile, the applicant has benefited from years of preparation

supported by substantial professional and financial resources, creating a clear imbalance between parties.

National policy and international principles underscore the importance of effective public participation in decisions of this scale. Specifically, GEN 18 of the National Marine Plan and the Aarhus Convention mandate that those affected must be given a realistic opportunity to contribute to decision-making. The conditions under which the island communities have been expected to respond fall short of this standard. The timing and volume of technical material—comprising thousands of pages—have further inhibited meaningful engagement, particularly as specialist advice has been least accessible during this period.

Given these circumstances, Scottish Ministers are urged to consider carefully the deficiencies in public participation when evaluating representations. The failure to provide adequate consultation opportunities for affected communities has tangible implications for the fairness and credibility of the decision-making process. Recognising these shortcomings is essential to uphold the principles of transparency and inclusivity that underpin effective planning.

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

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

1.1.24 Effects on Local Area

The applicant's mitigation measures fail to adequately address the significant direct effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby undermining the reliability of the environmental and heritage impact assessment. Islay and Colonsay are the closest islands to the proposed development, which lies immediately north-west of Islay and west of Colonsay within a 448 square kilometre area. However, the application predominantly considers Islay only as a potential project location, neglecting a place-based assessment of how its

Atlantic-facing communities would be affected in terms of setting, economy, and community life. For Colonsay and Oronsay, whose seaward outlook defines daily existence, the development array lies directly offshore. The North Colonsay and Western Cliffs Special Protection Area, located on Colonsay's coastline, is central to the applicant's derogation case and compensation plan, yet it simultaneously acknowledges that harm to the internationally protected seabird population there cannot be excluded. Furthermore, Oronsay Priory, a scheduled monument of national importance situated within this community, suffers from the same deficiencies in heritage assessment, particularly in relation to the treatment of its open maritime setting. These omissions collectively demonstrate that the applicant's evaluation underestimates the true extent of effects on these island communities and their heritage assets.

The applicant's assessment significantly underestimates the scale and significance of the visual, community, and heritage impacts on Iona, leading to an inaccurate evaluation of the environmental and social effects of the proposal. The Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity, with direct orientation towards the development site and extensive visibility. The predicted geographical extent of change is large, affecting an area approximately 21 kilometres away, with turbines extending across roughly 39 degrees of the horizon. This scale of visual impact is considerable, particularly when compared to familiar landmarks; for instance, Ben Hynish on Tiree, which is 141 metres high and visible from Iona at 33 kilometres, would be visually dominated by the largest turbines, which would exceed Ben Hynish's height by about 194 metres at a closer distance of roughly two-thirds that range.

The west coast of Iona is similarly characterised by high sensitivity and widespread visibility. The applicant acknowledges significant effects for residents and visitors across much of the island, including at Dùn Ì, Iona's highest point. However, despite the acknowledged sensitivity of the island's monastic landscape—encompassing the internationally important Abbey, Nunnery, and high crosses, whose significance is intimately connected to pilgrimage, arrival by sea, and movement through the landscape—the applicant's assessment falls short. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet no visualisation has been provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, a notable omission that undermines a full understanding of the visual effects on heritage assets.

Community concerns further reinforce the inadequacy of the assessment. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal. Despite this clear community response, the applicant's consultants did not assess habitability, which they themselves identified as a potential pathway of effect on the island's community. This represents a significant gap in the social impact evaluation.

In conclusion, the applicant's environmental and social impact assessment does not fully reflect the magnitude or importance of the effects on Iona's landscape, heritage, and community. The oversight of critical viewpoints, failure to assess habitability, and underestimation of visual scale collectively compromise the accuracy and reliability

of the evaluation. Consequently, the scale and significance of impacts on Iona must be reconsidered with greater rigour and comprehensiveness.

The applicant's assessment fails to fully recognise the practical consequences for Mull and the Ross of Mull coastal communities, particularly those reliant on tourism. Fionnphort, as the gateway to Iona and the embarkation point for visitors, is acknowledged to experience significant effects. However, beyond this, the communities whose livelihoods depend heavily on the flow of visitors and the integrity of the local seascape receive insufficient consideration, leaving a critical gap in understanding the development's economic and social impacts.

In terms of landscape and visual effects, the applicant concedes significant impacts on Core Paths and within the Central, South, and West Mull Local Landscape Areas. The Loch na Keal National Scenic Area, noted for its high sensitivity along 21 to 33 kilometres of coastline, is assessed only at a medium magnitude of effect. Similarly, the Ross of Mull South coastal area, despite its high sensitivity at 22 to 24 kilometres and the acceptance of significant effects at key locations such as Erraid, is downplayed by the attribution of only medium magnitude impacts. This approach underestimates the significance of changes to these designated landscapes, which are central to the character and attraction of the area.

The assessment's reliance on distance-based reasoning, particularly in the treatment of the Wilderness and Gribun Rocks coastal area where viewing distances exceed 30 kilometres, further diminishes the perceived scale of change. This overlooks the fact that Mull's west-facing tourism economy, including wildlife boat operations and accommodation providers, depends fundamentally on the unspoiled Atlantic seascape which this development would industrialise. Crucially, no place-based assessments have been conducted for these communities, resulting in an incomplete evaluation that neglects the true extent of visual, economic, and community impacts.

The applicant's assessment acknowledges the presence of several designated landscapes within the wider seaboard area, including the Loch na Keal National Scenic Area, which encompasses the islands of Ulva and Staffa, as well as the Jura and Scarba, Lunga and the Garvellachs National Scenic Areas. Ulva, a community-owned island situated within Loch na Keal, is highlighted as a small, re-establishing community whose regeneration relies heavily on the unspoilt seascape and natural setting. Notably, the applicant's assessment does not include any specific evaluation of the effects on Ulva, thereby omitting consideration of impacts on a vulnerable island community dependent on the very qualities at risk. Staffa, also within the Loch na Keal National Scenic Area and located approximately 35 kilometres from the proposed development, is recognised for its panoramic maritime qualities and status as one of Europe's most celebrated small islands. Despite this, the applicant concludes that the scale of change would be small and not significant, even though this lies beyond the 30-kilometre threshold NatureScot suggested for assessing impacts on National Scenic Area qualities.

The Jura National Scenic Area, characterised by its wild and undeveloped Atlantic outlook, is assessed by the applicant as having high sensitivity at a distance of approximately 28 to 32 kilometres from the development site. However, the

magnitude of impact is rated only as medium to low, primarily justified by distance, apparent scale, and retention of landforms. A similar approach is applied to the Scarba, Lunga and the Garvellachs National Scenic Area, situated 35 to 40 kilometres away, receiving the same moderate treatment. This approach underestimates the potential significance of effects on these designated landscapes by placing disproportionate weight on distance and visual scale without fully accounting for the intrinsic qualities that underpin their designation. Consequently, the assessment fails to adequately protect the natural and cultural characteristics of these important seaboard landscapes and their associated island communities.

The applicant's assessment concludes that the South Tiree coastal area, despite being approximately 35 kilometres away, experiences only a Low magnitude of change, even though it is acknowledged as having High sensitivity. This practical consequence is significant because it suggests that the visual and landscape impacts on Tiree's sensitive environment are minimal, which risks underestimating the true extent of change that the proposed development would cause. Such an understatement could lead to insufficient mitigation measures and a failure to fully protect the island's distinctive character.

Tiree's landscape is exceptionally low-lying and defined by the interplay of sea and sky, with its highest elevation, Ben Hynish, reaching only 141 metres. The introduction of turbines up to 335 metres tall would create vertical elements unprecedented in the island's open seascape, fundamentally altering the horizon that is central to its character. Given this context, assigning a Low magnitude of change to such a sensitive receptor is inconsistent with the physical reality and landscape experience, leading to an unreliable evaluation of effects that should be revisited to accurately reflect the scale of visual intrusion.

The applicant's assessment fails to address significant effects on mainland and island communities that have direct views of, and economic reliance upon, the seascape impacted by the proposed development. This omission undermines the comprehensiveness and reliability of the environmental appraisal. For instance, Gigha, a community-owned island emblematic of island regeneration following its purchase by residents, faces the development waters from the east. The finely balanced social and economic fabric of this community has not been examined in the assessment, despite its clear exposure to the development's influence. Similarly, Ardnamurchan Point, the westernmost point of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the receptors affected by the distance-based moderation criticised in this objection, yet they remain unassessed. Furthermore, the west coast of Kintyre comprises a chain of communities whose identity, outlook, and visitor economy are intrinsically linked to the open Atlantic seaboard views toward Islay, Jura, and adjacent waters. The Treshnish Isles and other smaller islands and mainland coasts with sightlines towards the development area share this position. By neglecting to evaluate the effects on these communities, the assessment fails to consider important social and economic receptors, thereby compromising its integrity and the planning process. It is therefore essential that the applicant revisits the assessment to fully incorporate the potential impacts on these mainland and island communities.

The environmental impact assessment systematically underestimates the significance of effects on sensitive receptors located beyond approximately 20 kilometres from the development site. This finding arises from a consistent pattern in the applicant's methodology, where the magnitude of change experienced by these receptors is moderated and their effects discounted. Such an approach inherently diminishes the recognised sensitivity and importance of distant communities.

Crucially, this distance-based moderation results in the omission of any place-based assessment for the communities affected beyond this threshold. As a consequence, the lived experiences and concerns of these populations remain unaddressed within the assessment framework. This absence undermines the comprehensiveness and integrity of the environmental evaluation, which ought to fully account for all significant effects regardless of geographic distance.

In conclusion, reliance on an arbitrary 20-kilometre cut-off to moderate effects cannot be justified where highly sensitive receptors exist beyond this range. A thorough and place-specific assessment is essential to ensure that all significant impacts are appropriately identified and mitigated. Without such rigor, the assessment fails to meet the necessary standards of environmental scrutiny and public accountability.

1.1.25 Personal Observations

In addition to the planning matters above, I am personally concerned because: The visual and environmental impact will be a catastrophe. The beauty and peace of the this precious area will be ruined.

Based on my own local knowledge, I also wish to highlight that: All of them

Finally, I would also ask the Scottish Ministers to consider: Please stop this development. The impact will be horrendous and will affect communities both on a daily basis, but also will deter tourism, which will kill off these communities who need tourism to not just thrive, but survive.

1.1.26 Summary

The proposal submitted by the applicant fails to demonstrate compliance with the relevant statutory and policy framework governing its determination. The assessment provided by the applicant acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along the coast. However, a detailed review of the applicant's documentation reveals that these impacts have been understated, and the mandated heritage assessment has not been conducted. Furthermore, the effects on the island communities that would be affected were identified but never subjected to proper evaluation. The ecological requirements have not been demonstrated as achievable, and it should be noted that only a portion of the project is currently before the Scottish Ministers for consideration.

In light of these shortcomings, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to deny the associated marine licence.

Should the Ministers choose not to refuse consent at this stage, I request that they require the submission of additional environmental information and enhanced visual representations. Moreover, I recommend that the applications be determined only following a public inquiry, thereby enabling a thorough examination of the issues raised in this objection. Regardless of the final decision, I further request that the Ministers provide explicit conclusions in their determination regarding the impacts on cultural heritage and the affected island communities.

Yours faithfully,

[Redacted]

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

Member of the public 504
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, which are the subject of application 00012385 seeking consent under section 36 of the Electricity Act 1989, alongside application 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. The applicant, MachairWind Limited (ScottishPower Renewables), proposes to develop an offshore wind farm with an installed capacity of approximately 2 GW. This development would consist of between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip, situated within a designated Windfarm Development Area spanning roughly 448 square kilometres. The site lies to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in proximity to the islands and coastal communities of the southern Hebrides.

It is requested that this letter be formally recognised as an objection, that my details be recorded accordingly, and that I receive notification of the final decision in relation to these applications.

The following sections detail the planning and environmental grounds underpinning this objection, framed within the statutory and policy context applicable to the determination of these proposals. It is important to emphasise that the onus lies with the applicant to provide robust and sufficient evidence to satisfy all relevant statutory tests. Objectors bear no legal obligation to disprove the proposals. Upon careful consideration of the evidence submitted, it is clear that the applicant has failed to meet this burden. Consequently, the applications should be refused consent.

1.1.27 Seascape, Landscape and Visual Effects

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

1.1.28 Cultural Landscape, Archaeology and Historic Environment

The practical consequence of relying on a landscape assessment that understates effects is that the heritage impact conclusions drawn from it become inherently unreliable. Where the landscape assessment fails to fully acknowledge the extent or significance of impacts, any subsequent heritage analysis that depends on that assessment will similarly minimize or overlook important consequences. This calls into question the overall robustness of the heritage conclusions presented.

Specifically, as noted in the evidence, the heritage conclusions are explicitly dependent upon the landscape assessment. Therefore, any understatement or omission within the landscape evaluation is inevitably carried forward, resulting in a cumulative understatement of effects on heritage assets. This interdependency means that deficiencies in the landscape assessment do not remain isolated but rather undermine the integrity of the entire heritage impact appraisal.

Given this dependency and the identified understatement of landscape effects, it is essential that the landscape assessment be revisited and revised to accurately reflect all significant impacts. Only then can the heritage conclusions be considered credible and reliable for planning purposes. Without such a reassessment, the current heritage impact conclusions lack the necessary evidential foundation and should not be accepted as robust.

1.1.29 Effects on Island Communities, Tourism and the Local Economy

The applicant's own consultants acknowledged that habitability constitutes a potentially significant pathway through which the proposal could impact island communities. Despite this, no assessment was undertaken to evaluate the habitability of the affected islands. Instead, the socio-economic assessment presented in Chapter 18 focuses primarily on regional-level analysis, detailing potential impacts on port communities while omitting an equivalent, place-based examination of the island communities directly facing the development. This approach leads to the conclusion that these island communities exhibit low sensitivity to tourism effects, a finding reached without the benefit of targeted, location-specific analysis.

Such a conclusion fails to recognise the distinctive nature of small island economies, which are not adequately represented by regional averages. These economies are typically concentrated in sectors that are highly vulnerable to changes in the environmental and social qualities that attract visitors. Far from mitigating sensitivity, reliance on increasing visitor numbers intensifies dependence on these at-risk qualities. Therefore, the assertion of low sensitivity to tourism impacts, unsupported by detailed place-based assessment, amounts to an unsubstantiated assumption rather than evidence. This fundamental flaw undermines the robustness of the socio-economic assessment and calls into question the adequacy of the methodology to understand or mitigate the proposal's effects on island communities.

1.1.30 Ecology, Biodiversity and Habitats Regulations

The practical consequence of the applicant's failure to meet the statutory tests is that the application cannot lawfully proceed without undermining the protection afforded to internationally important ecological features. This shortcoming directly impacts the decision-making process, as the legal framework requires unequivocal demonstration that such habitats and species will not be adversely affected. Without satisfying these tests, the application's approval would be inconsistent with statutory obligations.

The evidence submitted, including the applicant's own derogation documents, reveals a significant degree of uncertainty regarding the potential impacts on

protected habitats and species. This uncertainty stems from a lack of definitive demonstration that the statutory tests can be fulfilled. The tests are designed to safeguard internationally important ecological assets by ensuring that any development avoids, mitigates, or compensates for harm; the applicant has not provided sufficient assurance in this regard.

Consequently, the failure to demonstrate compliance with these legal requirements undermines the case for granting consent. It is essential that development proposals affecting internationally important habitats and species meet the statutory criteria fully and transparently. Given the evidence, it is clear that this application does not meet that standard and therefore should not be approved.

1.1.31 Effects on Local Area

The applicant’s assessment fails to consider significant effects on mainland and island communities that have direct visual and economic connections to the seascape in question. Notably, Gigha, a community-owned island emblematic of island regeneration, faces the development from the east, yet the potential impacts on its delicate community balance and economy remain unexplored. Similarly, Ardnamurchan Point—the most westerly tip of the British mainland—offers panoramic views along the Hebridean seaboard, attracting visitors whose experience depends on the unspoiled seaward panoramas. These receptors, critical to the local visitor economy, appear to be dismissed through a distance-based moderation approach. Furthermore, the west coast of Kintyre encompasses a series of communities whose identity and tourism are closely tied to the open Atlantic seaboard views towards Islay, Jura, and adjacent waters. The Treshnish Isles and other small islands and mainland coasts with sightlines to the development area share this vulnerability. The omission of these communities from thorough assessment undermines the comprehensiveness and reliability of the applicant’s environmental evaluation.

1.1.32 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the local communities and heritage of the coastal area. However, a thorough examination of the submitted documents reveals that the extent of these impacts has been understated. Notably, the necessary heritage assessment has not been conducted, and although the effects on the island communities were identified, they have never been properly assessed. Furthermore, the ecological criteria essential to the project have not been demonstrated as achievable. It is also important to highlight that the application before the Scottish Ministers encompasses only a portion of the overall project.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to decline the associated marine licence. Should the Ministers be inclined not to refuse outright, I request that they require additional environmental information and enhanced visual representations. Determination of the applications should follow a public inquiry,

thereby allowing a comprehensive examination of the issues raised in this objection. Regardless of the final decision, I ask that the Ministers provide explicit conclusions in their reasons concerning the impacts on cultural heritage and the affected island communities.

Yours faithfully,

[Redacted]

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

Member of the public 505
Dear Sir/Madam,

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

The development in question involves an offshore wind farm with an installed capacity of approximately 2 gigawatts. It comprises between 91 and 144 wind turbines, each reaching up to 335 metres to the blade tip. This array is proposed within a designated Windfarm Development Area spanning roughly 448 square kilometres of marine environment situated to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona. The site's proximity to the southern Hebridean islands and adjacent coastal communities raises significant considerations.

The grounds for objection are founded upon planning and environmental concerns, considered against the applicable statutory and policy frameworks governing these proposals. It remains incumbent upon the applicant to provide adequate and compelling evidence that all relevant statutory tests and policy requirements have been met. The role of objectors is not to establish the contrary but to highlight where the applicant's submissions fall short. On reviewing the evidence presented, it is clear that the applicant has failed to satisfy this evidential burden. Consequently, in accordance with the planning and licensing statutes, the applications ought to be refused consent.

1.1.33 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989, which require the applicant to have regard to the desirability of preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant is obliged to take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The Scottish Ministers, in determining this application, are similarly required to have regard to these statutory duties.

The evidence before the determining authority does not establish that these requirements have been adequately addressed. There are clear deficiencies and omissions in the application's consideration of these statutory duties, and no satisfactory demonstration that reasonable mitigation measures have been identified or proposed to address potential adverse effects on the protected interests. This lack of compliance with the statutory framework is a fundamental failing.

Given these unresolved uncertainties and the failure to meet the statutory obligations under Schedule 9 of the Electricity Act 1989, the application should be refused consent. Where compliance has not been demonstrated, and where evidence identifies such deficiencies and conflicts with the applicable legal and policy framework, these matters weigh decisively against granting consent.

The marine licence application fails to comply with the statutory requirements set out in Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland's National Marine Plan. Authorisation decisions must be taken in accordance with the National Marine Plan unless relevant considerations indicate otherwise. However, the application does not demonstrate compliance with key General Policies including GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and paragraph 4.81 regarding Sound Evidence, and GEN 21 and paragraph 4.85 addressing Cumulative Impacts. These policies are integral to the statutory assessment process, and failure to meet their requirements undermines the lawful basis for granting consent.

Moreover, the evidence identifies clear deficiencies and omissions in the application's demonstration of compliance with the applicable legal and policy framework. Where such shortcomings exist, they must weigh against the granting of consent. The absence of adequate evidence to satisfy the National Marine Plan's General Policies, combined with unresolved conflicts with statutory requirements, means the application cannot lawfully proceed. Consequently, the marine licence should be refused on the grounds that the proposal does not meet the necessary statutory and policy standards mandated by the Marine (Scotland) Act 2010 and the National Marine Plan.

The proposal fails to demonstrate compliance with the mitigation requirements set out in National Planning Framework 4, specifically in relation to Policies 3, 4, 7, and 11. These policies address biodiversity, natural places, historic assets, and energy, respectively, and are critical to ensuring that development does not adversely affect these key environmental and cultural resources. The application lacks sufficient evidence to show that the necessary measures to protect and enhance biodiversity and natural places have been adequately incorporated. Similarly, there is no clear demonstration that the historic assets and places impacted by the proposal have been properly considered or safeguarded in accordance with Policy 7. Furthermore, the energy strategy fails to meet the standards required by Policy 11, undermining the framework's objectives for sustainable energy use.

National Planning Framework 4 is a significant material consideration that must be applied alongside statutory duties and legislative requirements. The absence of demonstrated compliance, coupled with identified deficiencies and omissions in the submitted evidence, constitutes a direct conflict with the applicable legal and policy framework. As established in the framework, where such conflicts and failures exist, they weigh decisively against the granting of consent. Therefore, the proposal's failure to meet these essential policy requirements necessitates refusal in accordance with the statutory and policy context governing this application.

The application fails to provide the requisite Environmental Impact Assessment (EIA) and Habitats Regulations Assessment (HRA) as mandated by law, thereby precluding any lawful determination in its favour. Under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations, it is a statutory requirement that the likely significant environmental effects of the proposal be identified, assessed, and reported prior to any decision. This fundamental procedural obligation has not been met.

Furthermore, the Habitats Regulations impose a clear duty to assess the effects of the proposal on European protected sites in accordance with the applicable statutory tests. The absence of such an assessment constitutes a direct failure to comply with these legal requirements. The evidence confirms that compliance has not been demonstrated, and there are identifiable deficiencies and omissions in the environmental information submitted.

Given these material shortcomings and conflicts with the established legal and policy framework, the proposal cannot be considered compliant with statutory environmental safeguards. Consequently, these failures weigh decisively against the granting of consent.

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

The applicant has failed to provide robust, objective, and proportionate evidence to demonstrate compliance with every relevant statutory duty, planning policy, and environmental assessment requirement. This failure represents a fundamental shortcoming in meeting the evidential burden necessary for the determination of this application. Without such comprehensive demonstration, the proposal cannot be considered to have satisfied the legal and policy frameworks that govern planning consent.

Moreover, the evidence submitted reveals clear deficiencies and omissions in addressing the applicable legal and policy requirements. These unresolved matters constitute direct conflicts with the statutory and policy obligations that must be met before consent can be granted. The absence of adequate proof of compliance undermines the integrity of the decision-making process and weighs decisively against the approval of the proposal.

In conclusion, given the applicant’s failure to discharge the responsibility to demonstrate full compliance with all relevant legal and policy frameworks, and the

presence of identified evidential shortcomings, the proposal should be refused. The lack of satisfactory evidence to meet statutory and policy duties is a determinative factor that precludes the granting of planning consent in this case.

1.1.34 Conflict with National Planning Framework 4 and the Development Plan

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

In considering the proposal against the relevant policies within the National Planning Framework 4, it is apparent that the mitigation measures put forward do not adequately address the protections afforded to designated assets. Policy 11 must be read alongside Policies 4(c) and 4(d), which specifically safeguard National Scenic Areas and nationally important landscapes from significant adverse effects. Furthermore, Policies 7, including 7(h) concerning scheduled monuments and 7(c) and 7(d) relating to the setting of historic assets, as well as Policy 3 on biodiversity, establish a comprehensive framework for protection. The evidence shows that the proposed development would cause significant adverse effects to these nationally designated landscapes and seascapes, and the mitigation proposed falls short of preventing such harm.

Moreover, the submission has not demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, nor has it shown that the interests of island communities would be adequately safeguarded. Crucially, the ecological assessments fail to meet the necessary tests outlined in Policy 3, with no convincing evidence that biodiversity impacts can be effectively mitigated. Taken together, these shortcomings confirm that the proposal conflicts with the suite of NPF4 policies designed to protect nationally important landscapes, heritage assets, and biodiversity, and therefore cannot be supported.

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

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

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

1.1.35 Seascape, Landscape and Visual Effects

There is significant uncertainty regarding the reliability of the applicant's assessment methodology, particularly in relation to distance thresholds and their influence on the predicted effects. The methodology set out in Appendix 16.1 does not specify any distance beyond which major effects would cease to occur. However, an independently prepared Evidence Note, which draws solely on the applicant's Chapter 16 and related appendices, identifies a clear pattern across all three assessment streams. This pattern reveals that no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of its sensitivity or the extent of visibility.

Further examination of the applicant's own documents demonstrates the importance attached to distance in forming judgements. For example, in the assessment of a coastal area situated over 30 kilometres away, the scale of change is described as small explicitly due to the viewing distance involved. Moreover, the Landscape Character synthesis categorises magnitude of effect as High within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. This gradation inherently moderates the perceived magnitude of change as distance increases.

The consequence of this approach is that the protective tests required by the planning process are being applied to inputs that systematically understate potential impacts. By moderating magnitude at the very distances where the most sensitive designated landscapes are located, the assessment conclusions fail to provide a reliable account of the effects that the Scottish Ministers are being asked to consent to. This casts doubt on the adequacy of the appraisal and calls for a more robust and transparent evaluation framework before any determination is made.

While mitigation measures are often presented through visualisation materials to demonstrate their effectiveness, it is important to recognise the inherent limitations of such evidence. NatureScot's visualisation guidance, which has been adopted by the applicant, explicitly acknowledges that printed visualisations cannot fully replicate the scale perceived by a viewer in the field. This means that any assessment based on these materials must consider that the impressions formed may not accurately reflect real-world experience. Furthermore, wireline drawings included within the same panoramic projections share these limitations; they are technical renderings

embedded within the visualisation rather than independent tools that correct or enhance the photographic evidence. Therefore, reliance on these visual materials alone is insufficient to comprehensively assess visual impacts, and caution should be exercised in interpreting their significance within the planning evaluation.

While mitigation measures may reduce some visual impacts during daylight hours, they cannot address the fundamental change introduced by aviation and navigation lighting at night. The development would introduce such lighting to a sea horizon that is currently unlit, resulting in a permanent alteration of the night-time seascape character throughout its stated 35-year operational life. This lighting effect is inherently intrusive and unmitigable, as it is both continuous and unavoidable given safety requirements.

Furthermore, the temporal limitation of the operational life does not diminish the significance of the harm in planning policy terms. Granting consent for this development would effectively designate the seascape as appropriate for wind farm use, thereby setting a precedent that prioritises industrial activity over the existing character and tranquillity of the night-time maritime environment. This policy implication underscores the need for careful consideration of whether such a permanent alteration to the seascape is justified.

The applicant's assessment of the proposed development's effects on landscape and seascape interests fails to align consistently with its stated methodology, undermining the credibility of its conclusions regarding the scale of these impacts. While certain effects are acknowledged, the mitigation measures proposed do not sufficiently address the requirements set out in the relevant policies. This shortfall is particularly significant given the protections afforded to nationally important landscapes and seascapes, where robust and demonstrable mitigation is essential to meet policy objectives.

These deficiencies result in clear non-compliance with National Planning Framework 4 (NPF4) policies 4(c) and 4(d), 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan, all of which safeguard key landscape and seascape interests. The absence of a thorough demonstration that the proposal meets these policy requirements calls into question its suitability and merits refusal on the grounds of insufficient mitigation and policy non-conformity.

1.1.36 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment purports to follow Historic Environment Scotland's recognised methodology for evaluating effects on the setting of historic assets, a framework that necessitates a careful evaluation of how changes to setting influence the contribution that setting makes to an asset's cultural significance. This methodology, developed through consultation with Historic Environment Scotland, explicitly distinguishes between mere visual change and adverse impact, emphasising that visual alterations alone should not be equated directly with harm. Crucially, it requires an assessment of whether the integrity of the setting is adequately retained, ensuring that any conclusions drawn about heritage impacts rest on a rigorous evaluative process rather than descriptive observations.

However, a Methodological Audit prepared to support community objections, utilising only the applicant's Appendix 14.3, finds that although the operational assessment identifies relevant heritage attributes, it fails to demonstrate that the integrity of setting has been assessed in accordance with the applicant's own accepted methodology. The assessment's narrative focuses predominantly on visual factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation before concluding that the integrity of setting remains intact. This represents a critical omission, as the required evaluative step—linking these observations explicitly to the retention or loss of setting integrity—is absent in all the worked examples examined by the Audit. Consequently, the reliability of the applicant's conclusions about heritage impacts is fundamentally undermined.

The applicant's own baseline assessment acknowledges that the cultural significance of the affected heritage assets is deeply rooted in a range of experiential and landscape qualities. These include aspects such as pilgrimage, arrival by sea, and movement through a living cultural landscape, as well as the interrelationships between monuments, spirituality, and their surrounding landscape and seascape. Importantly, these qualities are experienced dynamically through movement rather than from fixed viewpoints. Despite this recognition, Historic Environment Scotland's consultation responses, as recorded within the application, have highlighted the need for additional viewpoints to ensure these broader experiential and cultural qualities are adequately represented. This suggests that the current assessment may not fully capture the holistic nature of the cultural landscape and its intangible attributes. Therefore, it is essential that the assessment methodology be expanded to incorporate these wider perspectives, to provide a more comprehensive understanding of heritage impacts in line with the applicant's own baseline findings and statutory consultees' advice.

The practical consequence of the shortcomings identified in the landscape assessment is that the subsequent heritage impact conclusions cannot be regarded as fully reliable. Since the heritage conclusions are directly dependent on the landscape assessment, any understatement of landscape effects inevitably results in a corresponding understatement within the heritage evaluation. This dependency means that the heritage impact findings are compromised to the extent that the landscape assessment fails to accurately capture the true magnitude of effects.

In this context, the evidence clearly indicates that where landscape effects have been understated as previously outlined, the heritage conclusions built upon these findings inherit the same deficiency. This linkage undermines the credibility of the heritage impact assessment and suggests that a more robust and comprehensive landscape analysis is essential to support sound heritage conclusions. Without addressing these deficiencies, the planning authority risks making decisions based on incomplete or misleading information regarding the potential heritage impacts.

The application fails to comply with essential policy requirements concerning the protection of heritage assets. Specifically, it engages National Planning Framework 4 (NPF4) Policy 7(h) relating to scheduled monuments, alongside Policies 7(c) and 7(d) which address the setting of such assets, as well as Policy GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Critically, the applicant has not demonstrated that the cultural significance of internationally and nationally important

heritage assets and their settings will be safeguarded. Furthermore, the Scottish Ministers have not been presented with the necessary assessment upon which such a conclusion would depend. Consequently, the proposal does not meet the statutory requirements for heritage protection and, therefore, cannot be regarded as acceptable in its current form.

1.1.37 Effects on Island Communities, Tourism and the Local Economy

Although mitigation measures are proposed, they fail to adequately address the fundamental threat posed by the development to the qualities that underpin the island communities' economies. These communities rely exceptionally heavily on visitors who are drawn specifically by the landscape, seascape, cultural heritage, tranquillity and remoteness—qualities identified in the applicant's own baseline assessments. Any alteration to these attributes directly undermines the economic foundations of these islands, which in turn jeopardises local services, population stability and the long-term viability of the communities themselves. Consequently, the proposal represents a significant risk to the essential economic and social sustainability of the island populations.

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

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

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

The proposal fails to comply with the necessary planning policies and statutory duties relating to island communities. Specifically, it does not meet the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions be founded on robust socio-economic evidence and adopt a precautionary approach when such evidence is insufficient. Furthermore, the

proposal falls short of the expectations of NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, both of which emphasise the importance of assessing and giving due weight to the interests of island communities through meaningful engagement throughout the planning process.

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

In conclusion, the statutory duties owed to island communities have not been discharged, and the proposal does not demonstrate compliance with the relevant planning policies. Given these deficiencies, the proposal cannot be considered acceptable in its current form. It is therefore respectfully requested that it be refused on the grounds of non-compliance with policy and statutory obligations regarding the protection of island communities.

1.1.38 Ecology, Biodiversity and Habitats Regulations

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

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

The applicant's submission includes both a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan specifically addressing the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are typically prepared in instances where adverse effects on the integrity of a protected site cannot be definitively ruled out. Their presence within the application therefore signifies a recognition by the applicant of potential harmful impacts on this designated area. Importantly, the submission of such documents indicates that the applicant acknowledges the possibility that Scottish Ministers may ultimately reach a different conclusion regarding the likelihood or extent of adverse effects than the applicant's own assessment suggests. In essence, while the applicant proposes measures intended to mitigate and compensate for any potential harm, the existence of these documents highlights an underlying uncertainty about whether such adverse effects can be fully avoided. Consequently, the application must be considered in light of this acknowledgment, with careful scrutiny given to the

adequacy of the proposed compensation measures should derogation be deemed necessary.

Mitigation, compensation proposals, and future monitoring, while important components of environmental management, do not in themselves satisfy the stringent legal requirements under the Habitats Regulations for granting consent to developments affecting protected habitats. The Regulations mandate that consent may only be lawfully granted where the competent authority has ascertained, beyond reasonable scientific doubt, that the proposal will not adversely affect the integrity of the protected site unless the strict derogation tests are met. This places the burden of proof firmly on the applicant to demonstrate compliance with these high evidential standards. This framework is reinforced by relevant provisions within GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. Any consent granted without meeting these rigorous tests would be incompatible with the established statutory and policy requirements governing protected habitats and species.

The applicant's submission falls short of demonstrating compliance with the statutory tests designed to safeguard internationally important habitats and species. An examination of the applicant's own derogation documents reveals a significant degree of uncertainty regarding the effectiveness of proposed mitigation measures. Consequently, the evidence submitted fails to provide the necessary assurance that these legal requirements can be met, thereby undermining the justification for granting planning consent.

1.1.39 Cumulative and In-Combination Effects

The current assessment process for the project fails to provide a comprehensive evaluation of its environmental and operational impacts, as only a portion of the development—the wind farm itself—is before the Scottish Ministers. Crucially, key components such as the export cable corridor and onshore transmission works, which are essential for the wind farm's operation, are deferred to separate future applications. This fragmented approach precludes a full understanding of the cumulative effects, as the necessary infrastructure enabling the project's function is excluded from the initial consent. Consequently, significant impacts are deferred to subsequent consenting stages, limiting the ability of decision-makers to consider the project's totality at once.

This method of piecemeal assessment is inconsistent with established legal principles, notably those upheld in Raeshaw Farms, which emphasise that a project must be evaluated in its entirety rather than divided into smaller segments to minimise apparent individual effects. By salami-slicing the development into separate parts, the assessment undermines the procedural requirement for holistic scrutiny and risks overlooking cumulative impacts that could influence the overall acceptability of the proposal. Therefore, the current approach is procedurally and legally flawed, and it is imperative that the full scope of the project, including all integral elements, is assessed together to ensure a robust and lawful decision-making process.

The practical consequence of relying on flawed baseline assessments is that the cumulative impact assessment fails to provide a reliable account of the true combined effects of the proposed development alongside other existing, consented, and foreseeable projects. This undermines the ability of decision-makers to fully understand the scale and significance of the overall impact on the environment and local communities.

This unreliability stems from the cumulative assessments depending directly on conclusions drawn in the Environmental Impact Assessment (EIA), particularly those relating to landscape, heritage, and socio-economic factors. When these underlying assessments understate effects, as demonstrated elsewhere, the cumulative assessment necessarily begins from a diminished baseline. Consequently, the aggregated effects presented do not reflect the actual extent of harm or change that would result from the cumulative development scenario.

It follows that the cumulative impact assessment cannot be regarded as a sound basis for planning decisions. Without an accurate baseline, the combined effects of this proposal and other developments are consistently underestimated, risking inadequate mitigation and management measures. A thorough reassessment is essential to ensure that the cumulative impacts are fully and fairly evaluated in line with statutory requirements.

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

This omission is significant as it undermines the integrity of the decision-making process. It is therefore essential that the treatment of any deferred works be explicitly addressed in the determination. Without such clarification, the potential environmental consequences may remain inadequately evaluated, which is contrary to the requirements of the relevant policy framework and statutory duties. Consequently, I respectfully request that these matters be given explicit and comprehensive consideration before any approval is granted.

1.1.40 Public Engagement, Site Selection and Environmental Information

The consultation process associated with the site-selection and planning application stages has demonstrably failed to meet the requisite standards for effective public participation. The applicant requests that Scottish Ministers attribute significant weight to the site-selection process; however, the deficiencies in public involvement at both the plan and site-selection phases have persisted into the application stage. Notably, the application documentation comprises many thousands of pages of technical material, presenting a substantial challenge for meaningful engagement. Moreover, the consultation period coincided with the busiest months for island communities, a time when residents are continuously occupied with the visitor season and access to specialist advice is at its lowest. This timing disparity is

particularly significant given that the applicant has had years, along with substantial professional and financial resources, to prepare its case, contrasting sharply with the limited capacity of affected communities to respond effectively.

National Marine Plan policy GEN 18, alongside the principles of effective public participation enshrined in the Aarhus Convention, explicitly require that those affected by decisions of this magnitude have a realistic and fair opportunity to engage. The conditions under which the local communities were expected to participate have fallen short of this standard, undermining the legitimacy and robustness of the consultation process. It is therefore essential that Ministers give careful and critical consideration to these shortcomings when evaluating the representations submitted, recognising that inadequate public participation has materially impacted the legitimacy of the site-selection and application processes.

There remains significant uncertainty regarding the adequacy of the Environmental Impact Assessment submitted with this application. While it is acknowledged that the assessment is extensive, the key question is whether it is sufficient to inform the Scottish Ministers' decision. The evidence demonstrates that, across several critical topics, the assessment either fails to fully investigate identified pathways to significant effects or relies on methodologies that undermine its conclusions. For example, the landscape assessment presents outcomes based on a distance pattern not supported by its own methodology; the heritage assessment does not substantiate the application of its stated integrity test; and the socio-economic assessment lacks any place-based analysis relevant to the islands affected. This calls into question the robustness and reliability of the environmental information provided.

Furthermore, the application depends in part on future assessments, post-consent plans, ongoing monitoring, and additional approvals to address outstanding issues. However, such reliance does not satisfy the requirements of the EIA Regulations, which mandate that likely significant effects must be fully understood prior to determination. The Scottish Ministers are required to make their decision based on the evidence before them at the time of application, not on assumptions that unresolved matters will be satisfactorily dealt with later. In this context, the applicant has not demonstrated that the environmental information submitted is adequate to meet this fundamental standard. Consequently, the application should not be approved on the basis of the current EIA evidence.

1.1.41 Effects on Local Area

The applicant's assessment significantly underestimates the direct and substantial effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby undermining the reliability of the environmental and heritage impact evaluation. Islay and Colonsay are the closest inhabited islands to the proposed development area, which covers 448 square kilometres immediately north-west of Islay and west of Colonsay. Despite this proximity, the application predominantly views Islay only as a potential project location rather than as a distinct island community subject to significant impact. Consequently, there is no place-based assessment of how the development would affect Islay's Atlantic-facing communities, their setting, economy, or community life.

For Colonsay and Oronsay, the situation is more acute as their seaward outlook directly faces the development array. The North Colonsay and Western Cliffs Special Protection Area, which constitutes Colonsay's coastline, is central to the applicant's derogation case and compensation plan. This indicates the strongest recognition within the application that harm to the internationally protected seabird population on these cliffs cannot be discounted. Furthermore, Oronsay Priory, a scheduled monument of national importance located within this community, suffers from the same deficiencies identified elsewhere in the heritage assessment, particularly concerning the evaluation of its open maritime setting.

In summary, the failure to adequately assess the effects on these island communities and their heritage assets results in a flawed and incomplete environmental and heritage impact appraisal, raising serious concerns about the overall reliability and robustness of the applicant's evaluation.

The applicant's assessment significantly underestimates the scale and significance of visual and community impacts on Iona, leading to an incomplete understanding of the environmental and social consequences. The Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity, with direct orientation towards the proposed development, extensive visibility, and a large geographical extent of change. The turbines would be visible from approximately 21 kilometres away, spanning around 39 degrees of the horizon, thereby affecting the ferry crossing between Fionnphort and Iona. Similarly, the West Coast of Iona is acknowledged as highly sensitive with widespread visibility, and the applicant concedes that significant effects would be experienced by residents and visitors across much of the island, including at Dùn Ì, its highest point. Despite this recognition, the assessment omits a comprehensive evaluation of habitability impacts on the local community, a pathway identified by the applicant's own consultants, even though a household consultation revealed that 92 per cent of respondents on Iona object to the proposal.

Moreover, the proposal's impact on Iona's internationally important monastic landscape is inadequately addressed. The applicant's baseline recognises the significance of pilgrimage, arrival by sea, and movement through the landscape as critical to the heritage value of sites such as the Abbey, the Nunnery, and the high crosses. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet no visualisation has been provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, a key vantage point. To contextualise the scale of visual impact, the largest turbines would exceed the height of Ben Hynish on Tiree—a familiar landmark standing at 141 metres and visible from Iona at approximately 33 kilometres—by around 194 metres, despite being viewed from roughly two-thirds of that distance. This comparison further emphasises that the applicant's assessment fails to fully capture the extent and significance of the visual and heritage effects on Iona, thereby compromising the accuracy of the overall environmental and social impact evaluation.

While the applicant acknowledges significant effects on certain locations such as Erraid, Core Paths of the Ross of Mull, and Fionnphort—the latter being the gateway to Iona and a key point for visitor embarkation—the mitigation measures proposed do not fully address the broader and more profound impacts on Mull and Ross of

Mull's coastal communities and landscapes. The Ross of Mull South coastal area, assessed as having High sensitivity at distances of approximately 22 to 24 kilometres and attributed only Medium magnitude of impact, exemplifies this insufficient recognition of harm. Similarly, although the Loch na Keal National Scenic Area is identified as of High sensitivity across a range of 21 to 33 kilometres, the applicant restricts the attributed magnitude to Medium, a conclusion that appears inconsistent with the area's significance.

The applicant's reliance on distance to downplay effects is further illustrated by the assessment of the Wilderness and Gribun Rocks coastal area, where impacts are judged small due to viewing distances exceeding 30 kilometres. This distance-based approach underestimates the visual and experiential intrusion on sensitive landscapes. Crucially, Mull's west-facing tourism economy, including wildlife boat operations and accommodation in western townships, depends on the unspoiled Atlantic seascape that the proposed development would industrialise. None of these communities has been provided with a place-based assessment, leaving a significant gap in understanding the economic and social consequences.

In summary, the applicant's assessment inadequately addresses the significant visual, economic, and community impacts on Mull and Ross of Mull. The reliance on distance to mitigate perceived effects and the absence of detailed, location-specific analysis fail to reflect the true magnitude of harm to designated landscapes and tourism-dependent communities.

The applicant's assessment underestimates the practical consequences for important designated landscapes and vulnerable island communities, notably by omitting any consideration of Ulva. This island, situated within the Loch na Keal National Scenic Area, is a small, community-owned settlement at the outset of regeneration. Its recovery is closely tied to the preservation of its natural setting and unspoilt seascape, yet the applicant has made no assessment of effects on Ulva's unique qualities, thereby overlooking critical factors that support the community's viability and cultural identity.

Similarly, the treatment of other designated landscapes appears insufficiently rigorous. Staffa, another island within the Loch na Keal National Scenic Area and renowned across Europe, lies approximately 35 kilometres from the development area—beyond the 30 kilometre limit suggested by NatureScot for assessing effects on National Scenic Area qualities. Despite the applicant's recognition of the panoramic maritime qualities of Staffa, it concludes that the scale of change would be small and the effect not significant. The Jura National Scenic Area, assessed at about 28 to 32 kilometres distance and of high sensitivity, is attributed only a medium to low magnitude of effect, justified by distance and retained landforms, even though its designation fundamentally depends on its wild, undeveloped Atlantic character. The Scarba, Lunga and the Garvellachs National Scenic Area, located some 35 to 40 kilometres away, receives comparable treatment. Collectively, these assessments appear to downplay the potential impacts on the natural and cultural qualities that underpin these designated landscapes and island communities.

The applicant's assessment designates the South Tiree coastal area as having High sensitivity at a distance of approximately 35 kilometres, yet concludes a Low

magnitude of change from the proposed development. This evaluation appears inconsistent when considering Tiree's distinctive physical and visual characteristics. The island is exceptionally low-lying, with its highest elevation, Ben Hynish, reaching only 141 metres. Its landscape character is fundamentally defined by the dominance of sea and sky, presenting an open oceanic horizon that is integral to its sense of place. Introducing turbines up to 335 metres high would create vertical elements entirely unprecedented in the existing seascape. Given the prominence and scale of such structures against Tiree's flat and exposed environment, the Low magnitude classification significantly understates the potential visual and experiential impacts. This underestimation calls into question the reliability of the applicant's overall evaluation of effects on this sensitive and distinctive landscape.

The applicant's assessment has not addressed significant effects on several mainland and island communities that have direct views of the proposed development and whose local economies depend on the seascape in question. For example, Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by residents, faces the development site from the east. Despite its finely balanced community and economy, the potential impacts on Gigha have not been examined. Similarly, Ardnamurchan Point, the westernmost point of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas represent precisely the receptors for which the applicant's distance-based moderation approach is applied, raising concerns that the visual and economic effects here have been underestimated. Furthermore, the west coast of Kintyre encompasses a series of communities whose outlook, character and visitor economy are intrinsically linked to the open Atlantic seaboard facing Islay, Jura and the surrounding waters. The Treshnish Isles and other small islands and mainland coasts with views towards the development area similarly share this position and have not been adequately considered. Collectively, these omissions compromise the comprehensiveness of the applicant's assessment by failing to fully evaluate the potential impacts on communities that are both visually and economically connected to the seascape in question.

The applicant's environmental impact assessment systematically applies a distance-based approach that moderates and discounts effects beyond approximately 20 kilometres, leading to a consistent underestimation of significant impacts on sensitive receptors. This methodology results in a failure to undertake any place-based assessment for communities located beyond this threshold, despite their exposure to noteworthy changes. Taken together, these observations establish a clear proposition: the approach adopted inherently diminishes the recognition of effects on distant yet highly sensitive receptors, thereby undermining the integrity and comprehensiveness of the assessment. Consequently, the environmental impact assessment cannot be regarded as robust or reliable in its current form.

1.1.42 Personal Observations

In addition to the planning matters above, I am personally concerned because: My father in law was born on the island and his family have been farming for generations. My children are so blessed to be able to go and visit their grandparents, aunties and uncles and cousins there. The direct and knock on effects would be

massive - to the natural beauty and to the natural landscape and wildlife. Totally devastating. I would challenge these people if they would want this on their Spanish community??

Based on my own local knowledge, I also wish to highlight that: All these little islands have wildlife - we see dolphins, basking sharks, puffins - and that is a massive draw for tourism to the area. Not just Iona. The beaches are stunning

Finally, I would also ask the Scottish Ministers to consider: Scottish ministers are not thinking of our economy. They have already been wreckless with our oil reserves and now jobs are being lost in oil and gas and platforms closed and we will soon have to pay huge tariffs to import oil into our country. Please don’t destroy another industry and our beauty

1.1.43 Further Comments

Iona is a beautiful place. Thousands of people visit every year, thousands of people visit Jura, Islay for the whisky festivals. Please don’t put all this at risk

1.1.44 Summary

The proposal for the MachairWind Offshore Wind Farm fails to meet the statutory and policy requirements applicable to its determination. The applicant’s own evaluation acknowledges significant impacts on nationally designated landscapes as well as on the coastal communities and their heritage. Moreover, published analyses of the applicant’s documents reveal that the magnitude of these impacts has been underestimated. Crucially, the necessary heritage assessment has not been conducted. The identified effects on the impacted island communities remain unassessed, and the ecological criteria required by law have not been demonstrated as achievable. Additionally, the Scottish Ministers are only being asked to consider a portion of the overall project.

In light of these deficiencies, it is respectfully urged that the Scottish Ministers refuse the consent sought for the MachairWind Offshore Wind Farm and decline the associated marine licence. Should the Ministers consider granting consent, it is further requested that additional environmental information and enhanced visual representations be provided. Furthermore, the applications ought to be determined only after the holding of a public inquiry, allowing for a thorough examination of the concerns raised in this objection.

Regardless of the outcome, it is also requested that the Ministers explicitly address and document their conclusions regarding the effects on cultural heritage and the island communities affected by the proposal within their decision rationale.

Yours faithfully,

[Redacted]

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

Member of the public 506
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, which are currently under consideration through application numbers 00012385 for consent pursuant to section 36 of the Electricity Act 1989, and 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. These applications, lodged by MachairWind Limited (ScottishPower Renewables), concern the establishment of an offshore wind farm with an anticipated capacity of approximately 2 gigawatts. The development envisages between 91 and 144 turbines, each reaching heights up to 335 metres to blade tip, situated within a designated Windfarm Development Area spanning roughly 448 square kilometres of marine environment to the north-west of Islay and west of Colonsay. This site lies approximately 21 kilometres from the island of Iona and is proximate to the islands and coastal communities of the southern Hebrides.

This objection is lodged with the request to be formally registered as an objector and for notification of the final determination on these applications. The following sections articulate the grounds for objection, focusing on the planning and environmental considerations framed by the relevant statutory and policy context governing the decision-making process. It is imperative to note that the onus lies squarely with the applicant to substantiate, through compelling and adequate evidence, that all applicable tests and criteria are met. Objectors bear no responsibility to establish contrary proof. In this instance, the evidence presented by the applicant fails to satisfy the requisite standards, and accordingly, consent ought to be withheld.

1.1.45 Legislative and Policy Framework

The applicant’s submission 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, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant must take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The evidence provided does not sufficiently address these requirements, leaving significant uncertainty as to whether these statutory duties have been properly considered or fulfilled.

In addition, the Scottish Ministers, as the determining authority, are mandated to have regard to the same statutory duties in their decision-making process. The absence of demonstrated compliance by the applicant, coupled with identified deficiencies and omissions in the evidence, constitutes a clear conflict with the applicable legal and policy framework. Such failures weigh decisively against the granting of consent for the proposal, as the statutory obligations under Schedule 9 have not been met to the requisite standard.

The proposal fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be properly considered and given due weight in the decision-making process. This

statutory obligation is not met, as the application lacks any substantive evidence that these interests have been adequately identified, assessed, or integrated into the planning rationale.

The Islands (Scotland) Act 2018 explicitly requires decision-makers to ensure that island communities' unique circumstances and needs are factored into planning decisions. In this case, the absence of any clear assessment or acknowledgment of the potential impacts on island communities constitutes a significant procedural and substantive deficiency. Without such consideration, the proposal conflicts with the applicable legal and policy framework.

Where compliance with the Act has not been demonstrated, or where evidence reveals omissions or conflicts with the statutory requirements, these shortcomings must weigh decisively against the granting of consent. The current proposal's failure to address the statutory duty to island communities represents a fundamental flaw that undermines the legitimacy of the decision-making process and justifies refusal.

1.1.46 Seascape, Landscape and Visual Effects

The applicant's assessment methodology lacks a defined distance threshold beyond which major effects are considered to cease, yet evidence indicates a clear pattern: no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of its inherent sensitivity or the extent of visibility. This implicit distance-based moderation is corroborated by the applicant's own documents, which acknowledge that at viewing distances exceeding 30 kilometres, the scale of change is judged as small, and that High magnitude effects are confined to within about 20 kilometres, Medium effects between approximately 20 and 30 kilometres, and Low effects beyond 30 kilometres for certain landscape types. Consequently, the inputs to the protective assessments are systematically understated at precisely the distances where the most sensitive designated landscapes are located, undermining the reliability of the conclusions presented to the Scottish Ministers for their consent decision.

The proposal, as currently presented, fails to comply with key planning policies designed to safeguard nationally important landscape and seascape interests, resulting in significant practical consequences for the area's environmental integrity. This non-compliance undermines the purpose of these policies, which seek to manage and mitigate adverse effects on valued natural settings. Without adherence to these requirements, the proposal risks causing unacceptable harm to the character and quality of the landscape and seascape, contrary to the intentions of the planning framework.

The applicant's assessment has not satisfactorily demonstrated that its conclusions regarding the scale of the identified effects align with the methodology it employed. This inconsistency calls into question the reliability of the evaluation and the robustness of any mitigation measures proposed. As a result, there is insufficient evidence to confirm that the project respects the protections afforded by the National Planning Framework 4 (NPF4) Policies 4(c), 4(d), 11(d), and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively aim to

ensure that development proposals do not compromise the integrity of nationally significant landscapes and seascapes.

Given these shortcomings, the proposal does not meet the established policy requirements intended to preserve the environmental and visual qualities of the area. To proceed without resolving these issues would be inconsistent with the planning framework's objectives and could set a concerning precedent for future developments in sensitive locations. Therefore, it is necessary for the proposal to be reconsidered and revised to demonstrate full compliance with the relevant policies before any approval can be justified.

1.1.47 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of heritage impacts fails to comply with the required methodology, thereby undermining the reliability of its conclusions regarding the integrity of setting. Although the applicant adopts Historic Environment Scotland's recognised methodology, which mandates an evaluation of whether changes to setting affect the contribution setting makes to cultural significance and whether the integrity of setting is maintained, this crucial evaluative step is absent. Instead, the assessment focuses on describing visual change—considering factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—but does not demonstrate how these observations translate into an assessment of setting integrity as required. A Methodological Audit, based solely on the applicant's Appendix 14.3, confirms that while heritage attributes are identified, the assessment does not evidence the necessary evaluative process, casting doubt on its conclusion that the integrity of setting is adequately retained.

The practical consequence of the applicant's current heritage assessment is that it risks underrepresenting the full extent of cultural impacts arising from the proposed development. This is because the baseline acknowledges that the affected heritage assets derive their significance not only from static features but from experiential qualities such as pilgrimage routes, arrival by sea, and movement through a living cultural landscape. The relationships between monuments, the sense of spirituality, and the connection to the surrounding landscape and seascape are integral to understanding the heritage value, and these qualities are experienced dynamically rather than from fixed viewpoints.

The applicant's methodology, however, appears to rely predominantly on conventional fixed viewpoints, which may fail to capture this broader cultural landscape and the sequential experience of the heritage assets. This limitation was highlighted by Historic Environment Scotland in their consultation responses, which are recorded within the application documentation. They specifically requested additional viewpoints to ensure that the wider experiential qualities and the interconnectedness of the heritage assets are properly represented in the assessment process.

In light of this, it is essential that the heritage impact assessment is expanded to incorporate these broader cultural and experiential dimensions. Without this, the assessment cannot fully inform decision-makers of the potential harm to the cultural significance that derives from movement and relationships within the landscape,

thereby compromising the ability to appropriately mitigate or avoid adverse effects. A more comprehensive approach would better safeguard the holistic heritage values identified in the baseline and ensure the planning process respects the full character of the affected assets.

1.1.48 Effects on Island Communities, Tourism and the Local Economy

The assessment establishes that the island communities affected by the proposed development rely exceptionally heavily on visitors for their economic and social well-being. The visitor numbers are drawn by intrinsic qualities identified in the applicant's own baseline studies, notably the landscape, seascape, cultural heritage, tranquillity and remoteness of the area. These attributes are not incidental but form the fundamental attractions upon which the local economy depends.

Any alteration to these defining characteristics would therefore have a direct and profound impact on the economic foundations of these island communities. This, in turn, would threaten the viability of essential services, the retention of local populations, and ultimately the long-term sustainability of these communities. The proposal, by risking degradation of these visitor-attracting qualities, jeopardises the continued economic and social viability of the islands themselves.

The applicant's own consultants acknowledged that habitability could represent a significant pathway through which the proposed development might impact island communities. Despite this recognition, no specific assessment of the habitability of the islands likely to be affected was undertaken. Instead, the socio-economic assessment presented in Chapter 18 focuses on regional-level analysis, providing detailed consideration of potential port communities but neglecting a comparable, place-based examination of the island communities facing the development. Notwithstanding this omission, the assessment asserts that these island communities exhibit low sensitivity to tourism-related effects, a conclusion reached without the necessary granular analysis.

This approach fundamentally misconstrues the nature of small island economies, which are not adequately represented by regional averages. Such economies tend to be concentrated in sectors that are highly vulnerable to changes in the attributes attracting visitors. Moreover, dependence on increasing visitor numbers serves not to mitigate sensitivity but rather to intensify reliance on the very qualities that may be threatened by the proposal. Consequently, the conclusion that island communities possess low sensitivity to tourism impacts is not supported by robust evidence but rests on an unsubstantiated assumption. This flaw undermines the reliability of the socio-economic assessment and calls into question its capacity to fully understand or mitigate potential adverse effects on island communities.

The proposal fails to meet essential planning and statutory requirements for the assessment and protection of island communities, resulting in a significant risk that their interests will be inadequately considered and potentially harmed. Without a robust and comprehensive evaluation of socio-economic impacts on these communities, the decision-making process lacks a sound evidential basis, undermining the precautionary principles mandated where evidence is insufficient.

This failure directly conflicts with the practical necessity of safeguarding the sustainability and wellbeing of island populations.

The applicant explicitly acknowledged that island communities warrant particular scrutiny; however, it did not undertake the necessary assessments to fully understand or mitigate the potential effects of the proposal on these communities. Consequently, it has not demonstrated that the development is compatible with the maintenance of sustainable island communities. This omission represents a serious shortfall in addressing the requirements set out in the National Marine Plan, specifically GEN 19 and paragraph 4.81, as well as the relevant provisions of NPF4 Policy 11(c).

Moreover, the statutory duties enshrined in the Islands (Scotland) Act 2018 have not been fulfilled, as there is no evidence of meaningful engagement with island communities from the inception of the proposal through to its conclusion. This lack of engagement and failure to weigh their interests appropriately is contrary to established legal and policy frameworks designed to ensure that island communities are not disproportionately impacted by development proposals. On this basis, the proposal cannot be considered compliant with the necessary planning and statutory standards and should therefore be refused.

1.1.49 Ecology, Biodiversity and Habitats Regulations

The development area and its surrounding waters are of considerable ecological importance, containing Priority Marine Features and Annex I habitats within the site itself. This environment also supports a range of protected species, including seabirds, marine mammals and the basking shark, all of which are sensitive to disturbance.

The proposed development would introduce extensive construction, operational and decommissioning activities on a very large scale, persisting for decades. Such prolonged and intensive activity poses a significant risk of adverse environmental effects on these important marine features and protected species, warranting careful and thorough consideration.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are characteristically prepared when an adverse effect on the integrity of a protected site cannot be definitively ruled out. Notably, the inclusion of these materials constitutes a significant element of the application, as it implicitly acknowledges the possibility of adverse impacts. Furthermore, the applicant’s own position suggests that Scottish Ministers may ultimately reach a different conclusion regarding the presence or extent of any adverse effects. While these submissions demonstrate the applicant’s recognition of potential impacts and an intent to mitigate them, this does not in itself confirm that all concerns have been fully addressed or resolved.

The legal framework governing developments affecting protected habitats is unequivocal in its requirements. Under the Habitats Regulations, consent for such

developments may only be granted where the competent authority has ascertained that the proposal will not adversely affect the integrity of the protected site, unless the strict derogation tests are met. Importantly, consent may lawfully be granted only where no reasonable scientific doubt remains regarding the absence of adverse effects. The responsibility to demonstrate this rests squarely with the applicant, who must provide clear and robust evidence to satisfy the statutory requirements. Mitigation, compensation measures, and future monitoring, while relevant, do not in themselves suffice to meet these stringent tests.

This legal obligation is further reinforced by policy provisions within the National Marine Plan and NPF4. Specifically, policies GEN 9 and GEN 13 of the National Marine Plan, alongside Policies 3, 4(b), 4(e), and 4(f) of NPF4, collectively establish a comprehensive policy framework that complements and supports the Habitats Regulations. These policies underscore the need for rigorous assessment and a high evidential standard when considering developments potentially impacting protected habitats and species, thereby ensuring ecological integrity is maintained.

Given this context, it is essential that any planning decision adheres strictly to these legal and policy requirements. The applicant must convincingly demonstrate beyond reasonable scientific doubt that the proposed development will not adversely affect the protected site's integrity. Without such evidence, consent cannot be lawfully granted. This approach safeguards the protected habitats and species, aligning with both statutory obligations and national planning policies.

The applicant's submitted evidence, notably their own derogation documents, reveals a significant shortfall in demonstrating compliance with the statutory tests designed to protect internationally important habitats and species. The degree of certainty provided is insufficient to satisfy these legal requirements, as acknowledged within the applicant's documentation itself. This failure directly undermines the fundamental protections afforded to such ecological features under the relevant statutory framework.

Given the applicant's inability to meet these critical legal standards, the application cannot be considered compliant with the statutory safeguards intended to preserve internationally important ecological assets. Consequently, the case for granting consent is fundamentally weakened, as the necessary assurances for environmental protection remain unsubstantiated. It is therefore appropriate to conclude that consent should not be granted in the absence of clear demonstration that these statutory tests have been satisfied.

1.1.50 Public Engagement, Site Selection and Environmental Information

The consultation period for this application, encompassing many thousands of pages of technical material, has been scheduled during the busiest months for island communities, coinciding with the continuous work demands of the visitor season. This timing has severely constrained the availability of specialist advice and the capacity of local residents to engage effectively, while the applicant has had years and substantial professional and financial resources to prepare its case. Such an imbalance has materially impaired meaningful public participation in both the plan and site-selection stages, an impact that persists into the current application phase.

The National Marine Plan's policy GEN 18 and the principles of effective public participation enshrined in the Aarhus Convention establish that those affected must have a realistic opportunity to influence decisions of this magnitude. The conditions under which the affected communities have been compelled to respond fall short of these essential standards. In light of these deficiencies, it is imperative that the Scottish Ministers carefully consider the legitimacy of the site-selection process and the representations made by local stakeholders when determining the weight to accord to public participation in this matter.

There remains considerable uncertainty regarding the sufficiency of the Environmental Impact Assessment submitted with this application. While the assessment is extensive in scope, its adequacy is questionable, as it identifies potential pathways to significant effects but fails to investigate them thoroughly. For example, the landscape assessment employs a methodology that does not align with the outcomes presented, notably applying a distance pattern not supported by its own framework. Similarly, the heritage assessment lacks demonstration of its own integrity test's application, and the socio-economic assessment omits a place-based analysis of the islands affected. These methodological shortcomings undermine the reliability of the conclusions drawn.

Moreover, the reliance on future assessment, post-consent plans, monitoring, and additional approvals does not satisfy the requirements of the Environmental Impact Assessment Regulations, which stipulate that likely significant effects must be understood before determination. The Scottish Ministers are compelled to decide based on the evidence currently available, rather than on the expectation that unresolved issues will be addressed satisfactorily at a later stage. The applicant has not demonstrated that the environmental information provided is adequate for informed decision-making, and as such, the application should not be approved in its present form.

1.1.51 Effects on Local Area

The applicant's assessment fails to adequately consider the direct and significant effects on the communities of Islay, Colonsay, and Oronsay, leading to an unreliable evaluation of environmental and heritage impacts. Although the development area lies immediately north-west of Islay and west of Colonsay, the application treats Islay primarily as a potential project location rather than recognising it as an affected island community. This approach overlooks the Atlantic-facing communities that border the nearest edge of the 448 square kilometre development area and neglects any place-based analysis of how the development would affect their setting, local economy, or community life.

For Colonsay and Oronsay, the situation is similarly concerning. The daily lives of these communities are defined by their seaward outlook, which faces the development area directly. Moreover, the North Colonsay and Western Cliffs Special Protection Area, located along Colonsay's own coastline, is central to the applicant's derogation case and compensation plan. This area's inclusion highlights the acknowledged risk of harm to the internationally protected seabird population, which the application admits cannot be ruled out. Such potential ecological damage further underscores the insufficiency of the assessment.

The heritage implications are equally significant. Oronsay Priory, a scheduled monument of national importance, lies within this community's area and is intimately connected to its open maritime setting. The previously identified shortcomings in the heritage assessment apply fully to the treatment of this monument's setting. Taken together, these deficiencies demonstrate that the applicant's evaluation underestimates the effects on local communities, economy, and heritage, thereby undermining the credibility of the overall environmental and heritage impact assessment.

The practical consequence of the applicant's assessment is that it underestimates the scale and significance of the impacts on Iona's visual environment, community, and heritage assets, thereby compromising the accuracy of the overall environmental and social impact evaluation. The Coastal Character assessment identifies the Sound of Iona as having high sensitivity, with extensive visibility of the proposed development across a large geographical area of approximately 21 kilometres. The turbines would extend across roughly 39 degrees of the horizon, directly affecting the ferry crossing between Fionnphort and Iona. The West Coast of Iona is similarly highly sensitive, with widespread visibility of the turbines and acknowledged significant effects for residents and visitors, including at Dùn Ì, the island's highest point. Such extensive visual influence is further emphasised when comparing the turbines to a familiar landmark: Ben Hynish on Tiree, which stands at 141 metres and is visible from Iona at 33 kilometres; the proposed turbines would exceed this height by approximately 194 metres, at around two-thirds of that distance, indicating a much more dominant visual presence than has been conveyed.

In addition to visual effects, the applicant's assessment fails to adequately account for impacts on Iona's internationally important monastic landscape, including the Abbey, the Nunnery, and the high crosses, whose significance is intrinsically linked to pilgrimage, arrival by sea, and movement through the surrounding landscape. Despite Historic Environment Scotland's request for additional viewpoints—including from the ferry crossing itself—no visualisation has been provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, a location critical to understanding the heritage context. Moreover, a household consultation on Iona revealed that 92 per cent of respondents object to the proposal, highlighting widespread local concern. Crucially, the applicant's own consultants identified habitability as a potential pathway of effect on this community, yet no assessment of this impact has been undertaken. Taken together, these omissions and underestimations call into question the reliability of the applicant's environmental and social impact conclusions with respect to Iona.

The applicant's assessment of the proposed development significantly underestimates the practical consequences for the coastal communities and landscapes of Mull and the Ross of Mull, particularly in relation to their tourism economies and designated scenic areas. For example, Fionnphort, which serves as the gateway to Iona and the primary embarkation point for visitors, is recognised by the applicant as experiencing significant effects. This community is directly dependent on visitor flows, yet no comprehensive, place-based assessment has been provided to address the impact on its social and economic wellbeing. Similarly, the Core Paths of the Ross of Mull and areas such as Erraid are acknowledged to be

significantly affected, yet these impacts are not fully accounted for in terms of their implications for local residents and visitors alike.

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

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

The applicant's assessment of the potential impacts on the wider seaboard designated landscapes and island communities appears to underestimate the significance of effects and omits critical considerations relating to vulnerable communities. While some mitigation measures are acknowledged, they do not fully address the specific sensitivities of these areas. For instance, Ulva, situated within the Loch na Keal National Scenic Area, is a community-owned island in the early stages of regeneration. Its recovery depends heavily on the preservation of its unspoilt seascape and setting, yet the applicant has failed to conduct any assessment of the effects on this small, re-establishing community.

Similarly, Staffa, also within the Loch na Keal National Scenic Area and recognised as one of the most celebrated small islands in Europe, lies approximately 35 kilometres from the development site. This distance exceeds the 30-kilometre range within which NatureScot requested that the qualities of National Scenic Areas be assessed. Despite this, the applicant concludes that the scale of change on Staffa would be small and the effect not significant, even though their own assessment acknowledges the island's panoramic maritime qualities. This inconsistency raises concerns about the adequacy of the evaluation.

Further designated landscapes such as the Jura National Scenic Area, assessed at 28 to 32 kilometres distance, are attributed only medium to low magnitude effects, primarily due to distance and retained landforms. However, Jura's designation relies on its wild and undeveloped Atlantic outlook, which may be more vulnerable to

change than the assessment suggests. The Scarba, Lunga, and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres away, receive a similar treatment, which may similarly understate the potential impacts. Overall, the applicant's approach does not fully recognise the importance of these seascapes and island communities, thereby undermining the protection of their natural and cultural qualities.

The applicant's assessment assigns a Low magnitude of change to the South Tiree coastal area despite recognising it as a receptor of High sensitivity at a distance of approximately 35 kilometres. This characterization is inconsistent with the exceptional sensitivity of Tiree's landscape, which is notably defined by its low-lying topography and expansive seascape. When compared to other locations where vertical structures have been introduced, the assessment's mitigation considerations appear insufficient to justify such a modest magnitude of change in this context.

Tiree's distinctive landscape character is fundamentally shaped by the dominance of sea and sky, with its highest elevation at Ben Hynish reaching only 141 metres. The introduction of turbines up to 335 metres in height represents vertical elements unprecedented within this open oceanic horizon. This scale of intervention would significantly alter the visual and experiential qualities of the island's seascape. Accordingly, the conclusion of a Low magnitude of change for such a sensitive and exposed receptor markedly understates the effects and results in an unreliable evaluation of impacts on Tiree's landscape character.

The applicant's assessment notably omits consideration of significant effects on mainland and island communities that have direct visual and economic connections to the seascape in question. Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by residents, faces the development waters from the east. Despite its finely balanced community and economy, the potential impacts on Gigha have not been examined. Similarly, Ardnamurchan Point, the most westerly point of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas represent precisely the type of receptors that are subject to undue distance-based moderation within the applicant's assessment, thereby undervaluing their sensitivity. Additionally, the west coast of Kintyre comprises a chain of communities whose outlook, character, and visitor economy are intrinsically linked to the open Atlantic seaboard facing Islay, Jura, and the surrounding waters. The Treshnish Isles and other small islands and mainland coasts with views towards the development area share this same reliance and exposure. The failure to address the effects on these communities compromises the comprehensiveness and robustness of the applicant's environmental and socio-economic evaluation, raising concerns over the completeness of the submitted evidence.

The applicant's environmental impact assessment systematically applies a distance-based approach that results in the moderation and discounting of significant effects on highly sensitive receptors located beyond approximately 20 kilometres. This methodology effectively diminishes the recognised magnitude of change experienced by these receptors, thereby understating the true extent of impact. Such an approach fails to account adequately for the lived experience of communities in

these areas, whose exposure to effects is neither fully acknowledged nor assessed on a place-specific basis.

Taken together, the evidence demonstrates that beyond the 20-kilometre threshold, the applicant's assessment consistently reduces the perceived severity of effects, creating a pattern of neglect towards the cumulative and contextual impacts on distant but sensitive locations. This systematic moderation undermines the integrity and completeness of the environmental impact assessment, as it does not provide a thorough evaluation of all potentially affected receptors. Without place-based assessments tailored to the circumstances of each community, the assessment falls short of its duty to comprehensively understand and mitigate environmental harm.

In conclusion, the reliance on a rigid distance criterion to discount effects beyond 20 kilometres compromises the robustness and fairness of the environmental impact assessment. To uphold the standards expected in planning and environmental evaluation, it is essential that significant effects on sensitive receptors, regardless of their distance, receive full and explicit consideration. Only through such rigorous and inclusive assessment can the decision-making process ensure that all affected communities are justly represented and environmental harms appropriately addressed.

1.1.52 Personal Observations

In addition to the planning matters above, I am personally concerned because: Wildlife and landscape, traffic to install

Based on my own local knowledge, I also wish to highlight that: Yes all isles

Finally, I would also ask the Scottish Ministers to consider: Our beautiful country

1.1.53 Summary

The proposal for the MachairWind Offshore Wind Farm fails to meet the statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges substantial impacts on nationally designated landscapes as well as on the heritage and communities along this coastal region. Further scrutiny of the applicant's published documents reveals that these impacts have been understated, with a necessary heritage assessment notably absent. Moreover, while the effects on the island communities affected by the development were identified, no formal assessment of these impacts has been undertaken. Ecological criteria essential to the project's approval have not been demonstrated as achievable, and it must be noted that only a portion of the entire project is currently subject to consideration by the Scottish Ministers.

In light of these shortcomings, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to deny the corresponding marine licence. Should the Ministers be inclined to grant consent, I request that they mandate the submission of additional environmental information and enhanced visual representations. Furthermore, I recommend that the determination of the

applications be deferred until after a public inquiry, thereby allowing for a thorough examination of the concerns raised in this objection.

Irrespective of the final decision, I also ask that the Scottish Ministers explicitly address and document their conclusions regarding the development's impact on cultural heritage and the affected island communities within their reasons for decision.

Yours faithfully,

[Redacted]

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

Member of the public 507
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, as set out in application 00012385 seeking consent under section 36 of the Electricity Act 1989, and application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications, tabled by MachairWind Limited (ScottishPower Renewables), must include my details as an objector, and I request to be informed of the ultimate decision regarding these proposals.

The project under consideration encompasses an offshore wind farm with a generating capacity around 2 gigawatts, envisaging between 91 and 144 turbines. Each turbine may reach a maximum height of 335 metres to blade tip. The development is proposed within a designated Windfarm Development Area spanning roughly 448 square kilometres of marine space located north-west of Islay and west of Colonsay, situated approximately 21 kilometres from Iona and in proximity to the southern Hebridean islands and their adjacent coastal communities.

My objection is grounded firmly in both planning and environmental considerations, assessed against the relevant statutory and policy frameworks governing such applications. It is important to emphasise that the applicant bears the onus of proof to demonstrate, with adequate and compelling evidence, that all requisite tests and criteria are met. Objectors are not obliged to establish contrary evidence. Upon careful examination, the applicant has failed to meet this evidential threshold. Consequently, the applications should be refused consent.

1.1.54 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989. This Schedule explicitly requires the applicant to have regard to the desirability of preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant must take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The Scottish Ministers, in determining the application, are similarly required to have regard to these statutory duties.

The evidence before the determining authority does not establish that these requirements have been adequately addressed. There are clear deficiencies and omissions in the application’s consideration of these statutory duties, and no satisfactory demonstration that reasonable mitigation measures have been identified or proposed. Given these unresolved uncertainties and failures, the application conflicts with the applicable legal and policy framework. Consequently, these matters weigh decisively against the granting of consent.

The marine licence application must be refused as it fails to demonstrate compliance with the statutory requirements of the Marine (Scotland) Act 2010 and the relevant policies of Scotland’s National Marine Plan. Under Part 4 of the Marine (Scotland) Act 2010, authorisation decisions are legally required to accord with the National

Marine Plan unless other relevant considerations apply. In this case, no such considerations have been identified to override the Plan's provisions.

The application does not satisfy the General Policies integral to the statutory assessment process. Specifically, there is no evidence that the proposal complies with GEN 4 (Co-existence), which requires that marine activities are managed to avoid unacceptable conflicts. The application also fails to address the requirements of GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment, leaving potential impacts on heritage assets insufficiently assessed. Similarly, the criteria set out in GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas have not been met, as the application lacks adequate evaluation of visual and landscape effects.

Furthermore, the application does not demonstrate conformity with GEN 9 (Natural Heritage), raising concerns about potential harm to protected species and habitats. The engagement obligations under GEN 13 and GEN 18 have not been fulfilled, undermining the transparency and inclusiveness expected in marine licensing decisions. The evidence supporting the application is deficient in meeting the standards of GEN 19 and paragraph 4.81 (Sound Evidence), resulting in an inadequate evidential basis for decision-making. Lastly, the application neglects the requirements of GEN 21 and paragraph 4.85 regarding Cumulative Impacts, failing to consider the combined effects of this proposal with other existing or planned activities.

Given these multiple deficiencies, omissions, and conflicts with the applicable legal and policy framework, the application does not meet the statutory test for granting consent. As established in the Marine (Scotland) Act 2010 and reinforced by the National Marine Plan policies, such failures weigh decisively against authorisation. Therefore, the marine licence application should be refused.

The proposal fails to provide the required comprehensive environmental impact assessment and habitats regulations assessment as mandated by law. Under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations, it is a statutory requirement that the likely significant environmental effects of the development be fully identified, assessed, and reported prior to any determination. Furthermore, the Habitats Regulations impose a clear duty to assess the effects of the proposal on European protected sites in strict accordance with the applicable statutory tests.

In this case, compliance with these legal obligations has not been demonstrated. The submitted evidence reveals deficiencies and omissions in the environmental impact assessment and habitats regulations assessment, resulting in a failure to meet the necessary statutory standards. Such shortcomings constitute a direct conflict with the established legal and policy framework governing environmental protection and habitat conservation.

Given these unresolved deficiencies and the absence of adequate assessment, the proposal does not satisfy the mandatory requirements of the relevant environmental legislation. Consequently, these failures weigh decisively against the granting of consent for the development.

The proposal fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities be properly considered and given due weight in the decision-making process. The submitted evidence does not show that these statutory obligations have been met. This omission constitutes a clear deficiency and procedural failure in the application. As established by the Act and confirmed in the supporting evidence, where such compliance is not demonstrated, or where deficiencies and omissions exist, these factors must weigh against the granting of consent. Therefore, the proposal should be refused on the basis that it does not adequately consider or address the interests of island communities as required by the Islands (Scotland) Act 2018.

The applicant has failed to dispel fundamental uncertainties regarding compliance with the full spectrum of statutory duties, planning policies, and environmental assessment requirements. The evidential submissions do not constitute robust, objective, and proportionate proof that every relevant legal and policy obligation has been met. This absence of comprehensive demonstration leaves critical questions unresolved about whether the proposal aligns with the mandatory frameworks governing the development. Such uncertainty undermines the confidence necessary for lawful decision-making and precludes any finding that the proposal satisfies the requisite legal standards.

Moreover, the evidence presented reveals clear deficiencies and omissions in addressing applicable statutory and policy criteria. These shortcomings amount to a failure to discharge the applicant’s burden of proof, as established by the governing principles that place responsibility squarely on the applicant to demonstrate compliance. In accordance with established planning law and policy, where compliance is not demonstrated or where conflicts with the legal and policy framework are evident, these factors must weigh decisively against the grant of consent. Given the unresolved evidential gaps and the absence of conclusive proof of conformity, the proposal cannot be considered compliant and must therefore be refused.

1.1.55 Conflict with National Planning Framework 4 and the Development Plan

NPF4 Policy 11 endorses renewable energy development; however, such support is conditional upon compliance with the policy’s impact criteria. Specifically, Policy 11(c) requires consideration of impacts on communities, while Policies 11(d) and 11(e) address the effects on landscape, seascape, and other receptors. The proposal under consideration fails to satisfy these requirements, thereby undermining the policy’s intended support framework.

As detailed in subsequent analyses, the proposal would result in significant adverse effects on nationally designated landscapes and seascapes. There is insufficient evidence to demonstrate protection of the cultural significance of scheduled monuments and their settings. Furthermore, the proposal does not adequately safeguard island communities, nor does it convincingly meet the necessary ecological tests. Collectively, these shortcomings amount to a conflict with the impact criteria set out in NPF4 Policy 11, calling into question the proposal’s compliance and justification under the policy.

The proposal must be assessed in the context of several interrelated policies within NPF4 that collectively seek to safeguard nationally important landscapes, heritage assets, and biodiversity. Policy 11 functions alongside Policy 4(c) and 4(d), which specifically protect National Scenic Areas and nationally important landscapes from significant adverse effects on their designated qualities. Furthermore, Policy 7 addresses the protection of scheduled monuments, particularly through Policy 7(h), and includes provisions concerning the settings of historic assets under Policies 7(c) and 7(d). Policy 3 complements these protections by establishing requirements for the conservation and enhancement of biodiversity.

In light of the evidence presented, the proposal conflicts with these critical policies. It would result in significant adverse effects on nationally designated landscapes and seascapes, undermining the very qualities for which these areas are protected. Moreover, the submission has not satisfactorily demonstrated that the cultural significance of scheduled monuments and their settings would be preserved. There is also a failure to show that island communities, which often rely on the integrity of their natural and historic environments, would be adequately safeguarded by the development. This lack of demonstration raises substantial concerns regarding compliance with the policies aimed at heritage and community protection.

Finally, the ecological requirements set out under Policy 3 have not been evidenced as being capable of fulfillment based on the materials submitted. Without convincing evidence that the ecological tests can be met, the proposal remains contrary to the biodiversity objectives enshrined in NPF4. Taken together, these shortcomings indicate that the proposal does not comply with the suite of policies designed to protect designated assets at the national level, and as such, the proposal should be reconsidered in light of these significant policy conflicts.

The proposal would result in adverse effects upon the landscape, heritage, and community interests safeguarded by the terrestrial development plan, including the Argyll and Bute Local Development Plan 2. These impacts demonstrate a clear conflict with the policies designed to protect these valued local attributes. Consequently, the proposal fails to accord with the relevant development plan framework and, when considered alongside National Planning Framework 4 in its entirety, this inconsistency remains unaddressed by the applicant. On this basis, the proposal should be refused as it is fundamentally at odds with the established planning policies intended to preserve the terrestrial environment.

1.1.56 Seascape, Landscape and Visual Effects

There is considerable uncertainty regarding the reliability of the applicant’s assessment methodology, particularly in relation to distance thresholds and their influence on predicted effects. Notably, the applicant’s written methodology, as set out in Appendix 16.1, does not specify any distance beyond which major effects are considered to cease. However, an independently prepared Evidence Note, which draws exclusively on the applicant’s Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of receptor sensitivity or visibility extent. This suggests that distance plays a determinative role in the judgements made. Further,

the applicant's own documents confirm this reliance on distance, with assessments of coastal areas over 30 kilometres away describing the scale of change as small due to viewing distance. The Landscape Character synthesis within these documents delineates impacts of High magnitude within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. The effect of this approach is to apply protective tests to inputs that are systematically moderated at distances where some of the most sensitive designated landscapes are situated. Consequently, the conclusions presented do not reliably represent the true effects that the Scottish Ministers are being asked to consider.

While mitigation measures are often informed by visual assessments, it is important to recognise the inherent limitations of the visualisation materials employed. The applicant's adherence to NatureScot's visualisation guidance ensures a standardised approach; however, this guidance explicitly acknowledges that printed visualisations cannot fully replicate the scale or immersive experience perceived by a viewer in the field. Consequently, reliance on these materials may understate or distort the actual visual impact of a development.

Furthermore, the wireline drawings included alongside photographic panoramas are not independent tools that correct or enhance the photographic evidence; rather, they are technical renderings subject to the same perceptual constraints as the photographs they accompany. This means that both forms of visualisation share inherent limitations and should be interpreted cautiously when assessing the true visual effects. Given these constraints, decision-makers should consider the potential discrepancies between visualisation materials and real-world perception when evaluating the visual impact of the proposal.

While mitigation measures may reduce some visual impacts during daylight hours, they cannot address the fundamental change introduced by aviation and navigation lighting at night. The development would introduce such lighting to a sea horizon that is currently unlit, resulting in a permanent alteration of the night-time seascape character throughout its stated 35-year operational life. This lighting effect is inherently intrusive and unmitigable, as it is both continuous and unavoidable given safety requirements.

Furthermore, the temporal limitation of the operational life does not diminish the significance of the harm in planning policy terms. Granting consent for this development would effectively designate the seascape as appropriate for wind farm use, thereby setting a precedent that prioritises industrial activity over the existing character and tranquillity of the night-time maritime environment. This policy implication underscores the need for careful consideration of whether such a permanent alteration to the seascape is justified.

The applicant acknowledges that the proposed development's effects engage several policies, specifically NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), GEN 7, and paragraph 4.28 of the National Marine Plan. However, the applicant has failed to demonstrate that its conclusions regarding the scale of these accepted effects align with its own assessment methodology. Moreover, there is a lack of evidence that the proposal complies with the policies designed to protect nationally important

landscapes and seascapes. This deficiency undermines confidence in the applicant's assessment and indicates non-compliance with the relevant planning policies safeguarding landscape and seascape interests.

1.1.57 Cultural Landscape, Archaeology and Historic Environment

The applicant's baseline assessment acknowledges that the cultural significance of the affected heritage assets extends beyond isolated physical features, encompassing a complex array of experiential qualities. These include the significance of pilgrimage routes, the historical arrival by sea, and the dynamic experience of movement through a living cultural landscape. The relationships between monuments, the spiritual associations they hold, and their integration within the surrounding landscape and seascape are central to the heritage value. Crucially, these elements are experienced not from fixed viewpoints but through continuous movement, highlighting the importance of understanding the heritage assets within their broader cultural and spatial context rather than as static or isolated features.

Historic Environment Scotland's consultation responses, as recorded within the application, reinforce this perspective by requesting additional viewpoints to ensure that these wider experiential and cultural qualities are fully represented. This indicates a recognition that the applicant's assessment, while comprehensive in certain respects, may not have adequately captured the full extent of the cultural landscape's significance. The omission of these wider viewpoints risks an incomplete understanding of how the heritage assets are perceived and valued in situ, potentially underrepresenting impacts on the cultural and spiritual dimensions integral to their heritage importance. In light of this, it is essential that any heritage impact assessment sufficiently encompasses these broader qualities to enable a fully informed planning decision.

1.1.58 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development rely to an exceptional degree on visitors, who are attracted specifically by the qualities identified in the applicant's own baselines: landscape, seascape, cultural heritage, tranquillity, and remoteness. These attributes form the foundation of the visitor experience and underpin the local economy, making them integral to the viability of these communities. Any alteration to these defining characteristics would therefore have a direct and significant impact on the economic base that sustains these islands.

Such an impact would extend beyond the immediate economic consequences to affect essential local services, population stability, and the overall sustainability of the communities. The interdependence of the economy and social fabric means that changes diminishing the qualities which draw visitors threaten not only financial prosperity but also the continuing viability of these island settlements. It follows that the proposal, by jeopardising the very qualities that attract visitors, poses a fundamental risk to the long-term economic and social sustainability of the island communities.

The applicant's own consultants acknowledged that habitability could represent a significant pathway through which the proposed development might impact island

communities. Despite this recognition, no specific assessment of the habitability of the islands likely to be affected was undertaken. Instead, the socio-economic assessment presented in Chapter 18 focuses on regional-level analysis, providing detailed consideration of potential port communities but neglecting a comparable, place-based examination of the island communities facing the development. Notwithstanding this omission, the assessment asserts that these island communities exhibit low sensitivity to tourism-related effects, a conclusion reached without the necessary granular analysis.

This approach fundamentally misconstrues the nature of small island economies, which are not adequately represented by regional averages. Such economies tend to be concentrated in sectors that are highly vulnerable to changes in the attributes attracting visitors. Moreover, dependence on increasing visitor numbers serves not to mitigate sensitivity but rather to intensify reliance on the very qualities that may be threatened by the proposal. Consequently, the conclusion that island communities possess low sensitivity to tourism impacts is not supported by robust evidence but rests on an unsubstantiated assumption. This flaw undermines the reliability of the socio-economic assessment and calls into question its capacity to fully understand or mitigate potential adverse effects on island communities.

The proposal fails to meet essential planning and statutory standards concerning the protection and assessment of island communities, resulting in a significant shortfall in compliance that undermines the decision-making process. National Marine Plan policy GEN 19 and paragraph 4.81 explicitly require that decisions affecting marine and island environments be founded on robust socio-economic evidence, adopting a precautionary approach where such evidence is incomplete or uncertain. Furthermore, NPF4 Policy 11(c) alongside the Islands (Scotland) Act 2018 impose a clear statutory duty to assess and appropriately weigh the interests of island communities, ensuring meaningful engagement from the earliest stages through to the conclusion of the planning process.

In this case, the applicant has acknowledged the necessity of particular scrutiny for island communities but has failed to conduct the requisite assessment to understand the proposal’s potential effects on them. There is a notable absence of evidence demonstrating compatibility with the sustainability of these communities, nor is there any indication that the statutory duties owed to island populations have been satisfactorily fulfilled. This omission contravenes both policy and legislative requirements, leaving the interests of island communities insufficiently considered and inadequately protected.

In conclusion, the proposal does not comply with the relevant planning policies or statutory obligations relating to island communities. The lack of a thorough assessment and meaningful engagement means that the proposal cannot be regarded as compatible with the principles of sustainable development for island communities, nor can it be approved without rectifying these fundamental deficiencies.

1.1.59 Ecology, Biodiversity and Habitats Regulations

The proposed development, involving extensive construction, operation, and eventual decommissioning over several decades, would have a substantial presence within an ecologically sensitive marine environment. This environment includes Priority Marine Features and Annex I habitats located directly within the development area, indicating a high level of ecological importance. The scale and duration of the activities pose a significant risk of adverse environmental effects.

Surrounding the development site, the waters support a diverse range of protected species, including seabirds, marine mammals, and basking sharks. These species rely on the area for critical life processes, and disruption could lead to detrimental impacts on their populations and the wider ecosystem. The introduction of large-scale industrial activity threatens the integrity of these habitats and the species they support.

Given the ecological sensitivity and the presence of priority conservation features, any proposal must carefully consider the potential for significant environmental harm. Mitigation measures alone may be insufficient to address the scale of impact anticipated, and the precautionary principle should guide decision-making to prevent irreversible damage to this valuable marine environment.

The practical consequence of the applicant's submission is that there is an acknowledged risk of adverse effects on a protected site, specifically the North Colonsay and Western Cliffs Special Protection Area, which supports a significant guillemot population. By providing a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan, the applicant signals an awareness that the project could impact the integrity of this designated area. This recognition is crucial, as it frames the application within the context of potential environmental harm that requires careful consideration.

These documents are not standard procedural submissions; they are specifically prepared for circumstances where adverse effects cannot be ruled out. Their presence in the application package demonstrates that the applicant is seeking to address these impacts through derogation provisions, which are legal mechanisms allowing certain activities that might otherwise be prohibited due to their environmental consequences. The compensation plan, targeted at the guillemot population, reflects an effort to mitigate potential ecological damage, underscoring the applicant's intention to manage and reduce harm to protected species.

Nevertheless, it is important to note that the applicant's own approach acknowledges a degree of uncertainty, as the Scottish Ministers may ultimately reach a different conclusion regarding the likelihood or significance of adverse effects. This uncertainty reinforces the need for a rigorous and cautious assessment process. The submission of these documents, therefore, constitutes a significant aspect of the application and warrants thorough scrutiny to ensure that the integrity of the protected site is safeguarded in accordance with relevant policies and statutory obligations.

Consent for developments affecting protected habitats and species can only be granted where it is conclusively demonstrated that there will be no adverse effect on the integrity of the protected site, unless the strict derogation tests under the Habitats

Regulations are satisfied. The competent authority must be certain that no reasonable scientific doubt remains regarding the proposal's impacts. This high evidential standard places the burden of proof firmly on the applicant. Importantly, mitigation measures, compensation proposals, and future monitoring arrangements alone do not suffice to meet the statutory requirements. This legal framework is reinforced by the Habitats Regulations and is further engaged through relevant policy provisions, including GEN 9 and GEN 13 of the National Marine Plan, as well as NPF4 Policies 3, 4(b), 4(e), and 4(f). In summary, planning consent in these circumstances demands robust, unequivocal evidence that statutory tests are fully satisfied before permission may lawfully be granted.

The practical consequence of the applicant's failure to demonstrate compliance with statutory tests is that the application falls short of the legal safeguards designed to protect internationally important ecological features. Without clear evidence that these tests can be satisfied, proceeding with consent risks significant and potentially irreversible harm to protected habitats and species.

The submitted evidence, including the applicant's own derogation documents, reveals a troubling lack of certainty regarding the impacts on these internationally significant ecological assets. This absence of demonstrable compliance with statutory requirements undermines confidence in the applicant's ability to mitigate or avoid harm, a prerequisite for lawful consent under the relevant environmental protections.

Given this fundamental shortcoming, it is not appropriate to grant planning permission. The statutory framework exists precisely to ensure that developments do not compromise vital ecological interests, and the failure to meet these tests justifies refusal in order to uphold statutory obligations and conserve internationally important habitats and species.

1.1.60 Cumulative and In-Combination Effects

The practical consequence of the current assessment approach is that it fails to provide a comprehensive evaluation of the project's overall impacts, as only part of the project is presently before the Scottish Ministers. Crucially, the export cable corridor and the onshore transmission works—both essential for the wind farm's operation—are excluded and deferred to subsequent applications. This fragmentation means that the cumulative effects of the entire project are never assessed together, but instead are considered piecemeal through later consenting processes after the principal decision has been made. Such an approach directly contravenes the established legal principle, affirmed by the courts in Raeshaw Farms, which requires a project to be assessed in its entirety rather than being artificially divided into smaller components whose individual impacts may appear less significant. Consequently, the current assessment methodology is legally and procedurally flawed, undermining the integrity of the environmental evaluation and the decision-making process.

The cumulative impact assessment relies directly on the findings presented in the Environmental Impact Assessment, which itself contains understated effects within the landscape, heritage, and socio-economic evaluations. As a result, the baseline

from which cumulative effects are measured is inherently reduced, leading to an underestimation of the true combined impact of the proposed development alongside existing, consented, and foreseeable projects. This flawed approach undermines the reliability of the cumulative assessment, as it fails to capture the full extent of potential adverse effects when considered collectively.

The applicant's submission fails to demonstrate compliance with key planning policies and regulatory requirements relating to project splitting and the assessment of cumulative effects. Specifically, the evidence engages GEN 21 and paragraph 4.85 of the National Marine Plan, alongside NPF4 Policy 11(e), as well as the Environmental Impact Assessment Regulations, all of which mandate comprehensive evaluation of cumulative and in-combination effects. The applicant has not reliably identified or assessed these effects for the proposal in its entirety, leaving a significant gap in the environmental appraisal.

Furthermore, the treatment of deferred works remains unaddressed, raising concerns about the completeness and transparency of the decision-making process. It is therefore requested that the decision expressly considers these deferred elements to ensure full regulatory compliance and informed planning outcomes. Without such explicit consideration, the proposal cannot be deemed to meet the necessary policy and environmental standards.

1.1.61 Public Engagement, Site Selection and Environmental Information

The applicant urges Scottish Ministers to accord significant weight to the site-selection process, thereby making the quality of public participation within that process a matter of direct relevance. However, there have been notable deficiencies in public engagement not only during the plan and site-selection stages but persisting into the current application phase. The application itself comprises several thousand pages of highly technical documentation. Compounding this complexity, the consultation period has coincided with the busiest months of the year for island communities, a time when local residents are heavily engaged in continuous work throughout the visitor season. This period also represents when access to specialist advice is at its lowest, placing an additional burden on those seeking to engage meaningfully. In contrast, the applicant has had years to prepare, backed by substantial professional and financial resources, highlighting a significant imbalance in the ability to participate effectively.

The National Marine Plan's policy GEN 18, alongside the principles of effective public participation enshrined in the Aarhus Convention, mandates that those affected by decisions of this magnitude must be afforded a realistic opportunity to engage. Unfortunately, the conditions under which the affected communities have had to respond fall well short of these established standards. This deficiency undermines the legitimacy of the consultation process and, by extension, the robustness of the site-selection exercise that the applicant wishes to emphasise. It is therefore imperative that Ministers take these shortcomings into careful consideration when evaluating the representations submitted, recognising the serious implications for the fairness and inclusivity of the decision-making process.

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

Moreover, the application relies in several instances on future assessments, post-consent plans, monitoring, and additional approvals to address outstanding matters. Such reliance is inconsistent with the requirements of the EIA Regulations, which mandate that likely significant effects be understood prior to determination. The Scottish Ministers are obliged to decide on the basis of the evidence submitted, without presuming that unresolved issues will be satisfactorily addressed subsequently. The applicant has not demonstrated that the environmental information provided is adequate to enable an informed decision, rendering the EIA insufficient for the purpose of this application.

1.1.62 Effects on Local Area

The applicant's assessment recognises Islay and Colonsay as the closest islands to the proposed development area, which lies immediately north-west of Islay and west of Colonsay. However, the assessment predominantly considers Islay in terms of its potential role as a direct project location rather than as an affected island community in its own right. This approach overlooks the proximity of the development's Atlantic-facing edge to Islay's communities and neglects any place-based evaluation of the effects on their setting, economy, or community life within the 448 square kilometre development zone. Such an omission significantly undermines the reliability of the environmental and heritage impact evaluation, given the integral relationship between these communities and their maritime environment.

Colonsay and Oronsay are similarly impacted, with their daily life defined by a seaward outlook facing the development array directly. The North Colonsay and Western Cliffs Special Protection Area, located along Colonsay's coastline, is the focus of the applicant's derogation case and compensation plan, implicitly acknowledging that harm to the internationally protected seabird population cannot be excluded. Furthermore, Oronsay Priory, a scheduled monument of national importance situated within this community, is subject to the same deficiencies identified in the heritage assessment, particularly regarding the treatment of its open maritime setting. These gaps further call into question the thoroughness and accuracy of the applicant's evaluation of direct and significant effects on the heritage and environment of these islands.

The practical consequence of the applicant's assessment is a substantial underestimation of the visual and social impacts on Iona, which affects the reliability of the environmental and social impact evaluation. The Coastal Character assessment clearly identifies the Sound of Iona as having high sensitivity, with direct

orientation towards the proposed development and extensive visibility. The turbines would be visible across a large geographical area, approximately 21 kilometres away, spanning about 39 degrees of the horizon. This significant visual intrusion extends to the West Coast of Iona, also recognised as highly sensitive with widespread visibility. The applicant concedes that residents and visitors throughout much of the island, including those at Dùn Ì—its highest point—would experience significant effects. Notably, the scale of the turbines is considerable when compared to familiar landmarks; for instance, the tallest turbines would exceed Ben Hynish on Tiree, a 141-metre high landmark seen from Iona at 33 kilometres, by around 194 metres despite being visible at only two-thirds of that distance.

Furthermore, the assessment fails to adequately account for Iona's internationally important monastic heritage, which is intrinsically linked to pilgrimage, arrival by sea, and landscape movement. Historic Environment Scotland's request for additional visualisations, including viewpoints from the ferry crossing and elevated ground such as Càrn Cùl ri Èirinn above St Columba's Bay, has not been met, leaving a critical gap in understanding the heritage impact. Community perspectives further highlight this shortfall: a household consultation revealed that 92 per cent of respondents on Iona oppose the proposal. Despite this, the applicant's own consultants identified habitability as a potential pathway for impact on the community, yet no assessment of this has been undertaken. Taken together, these omissions and understatements compromise the accuracy of the overall impact evaluation and raise serious concerns about the adequacy of the applicant's approach.

The applicant's assessment of visual and community impacts on Mull and Ross of Mull coastal areas notably underestimates the significance of effects despite recognising some high sensitivities. While mitigation measures are acknowledged, they rely heavily on distance-based reasoning that inadequately addresses the experiential and economic consequences for local communities. For instance, the Ross of Mull South coastal area is identified as having High sensitivity at 22 to 24 kilometres and is attributed only Medium magnitude impacts, yet significant effects are accepted at Erraid and on the Core Paths of the Ross. Fionnphort, a key gateway to Iona and the primary embarkation point for visitors, is acknowledged to be significantly affected, yet no place-based assessment has been undertaken for this community most directly tied to visitor flows. Similarly, across Mull, significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Area are accepted, and the Loch na Keal National Scenic Area, despite being of High sensitivity throughout at distances of approximately 21 to 33 kilometres, is assigned no more than Medium magnitude impacts. This approach is further exemplified in the treatment of the Wilderness and Gribun Rocks coastal area, where the applicant's conclusion of a small scale of change due solely to viewing distances over 30 kilometres illustrates a reliance on quantitative distance rather than qualitative experience. Crucially, Mull's west-facing tourism economy—including wildlife boat operations and accommodation providers—depends on the largely unindustrialised Atlantic seascape that the development would fundamentally alter, yet none of these vital communities has received a tailored, place-based impact assessment. This collective inadequacy in addressing the significant visual, economic, and community impacts on Mull and Ross of Mull's designated landscapes and tourism-dependent populations represents a fundamental shortcoming in the applicant's assessment.

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

The applicant's assessment recognises the South Tiree coastal area as having High sensitivity at a distance of approximately 35 kilometres, yet attributes only a Low magnitude of change to the effects of the proposed development. This evaluation appears inconsistent given the acknowledged sensitivity of the receptor and its considerable distance from the site.

Tiree's landscape is uniquely characterised by its exceptionally low-lying topography, with its highest point, Ben Hynish, reaching merely 141 metres. The island's defining features are the expansive sea and sky, presenting an open oceanic horizon. The introduction of turbines up to 335 metres in height would create vertical elements unprecedented in Tiree's seascape. Consequently, the applicant's conclusion of a Low magnitude of change in such an exposed and sensitive environment significantly understates the true extent of the impact, rendering the overall evaluation unreliable.

The applicant's assessment fails to consider significant effects on mainland and island communities that have direct views of the development and rely on the seascape economically, thereby undermining the comprehensiveness of the evaluation. Gigha, a community-owned island notable for its successful regeneration, faces the development waters from the east; yet, no examination has been made of the potential impacts on its delicate community balance and economy. Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the receptors affected by the applicant's distance-based moderation approach, which diminishes their acknowledged importance. Furthermore, the west coast of Kintyre comprises a series of communities whose character, outlook, and visitor economy are intrinsically linked to the open Atlantic seaboard, including views toward Islay, Jura, and surrounding

waters. The Treshnish Isles and other small islands and mainland coasts with sightlines toward the development area are similarly positioned, yet none have been adequately assessed. This omission raises concerns about the thoroughness of the environmental and socio-economic evaluation presented.

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

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

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

1.1.63 Personal Observations

In addition to the planning matters above, I am personally concerned because: Will significantly impact the tourism in the local area and negatively effect the local businesses in the area. It will also make a huge difference to the scenic views from the shoreline and make what is a beautiful scenic town come across industrialised and Thars not what people live there and come there for.

Based on my own local knowledge, I also wish to highlight that: Close proximity to various islands in the area and look awful from the shore as they are so close and incredibly tall

Finally, I would also ask the Scottish Ministers to consider: Is there a critical need for this wind farm or is it an excessive project that merely aims to monetize abd profit off the sea with disregard for the local community surrounding the area

1.1.64 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the relevant statutory and policy requirements governing its determination. The applicant's own documentation acknowledges significant impacts upon nationally designated landscapes, as well as on the cultural heritage and communities along this coastal region. Independent reviews of the submitted materials reveal that these impacts

have been understated, with a comprehensive heritage assessment notably absent. Moreover, while effects on the island communities impacted by the development were identified, no formal assessment of these impacts has been undertaken. The ecological criteria necessary for approval have not been demonstrated to be achievable. Additionally, it should be noted that only a portion of the project is currently subject to consideration by the Scottish Ministers.

In light of these shortcomings, it is respectfully urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm and decline to grant the associated marine licence. Should the Ministers decide against refusal, it is requested that they require the submission of further environmental information alongside enhanced visual representations. Furthermore, it is recommended that the applications be determined only following a public inquiry, thereby allowing thorough examination of the concerns raised within this objection. Regardless of the final decision, it is also requested that the Ministers provide explicit conclusions in their decision statement concerning the effects on cultural heritage and the affected island communities.

Yours faithfully,

[Redacted]

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

Member of the public 508
Dear Sir/Madam,

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

In accordance with the statutory and policy context governing the determination of these applications, I request that this communication be recorded as a formal objection, that I be registered accordingly, and that I receive notification of the final decision. It is fundamental to note that the onus rests firmly on the applicant to satisfy all relevant planning and environmental tests with robust and comprehensive evidence. Objectors bear no obligation to establish contrary proof. Having carefully considered the evidence submitted, I find that the applicant has failed to discharge this burden. Consequently, and for the reasons elaborated below, the applications should be refused consent.

1.1.65 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989. This Schedule explicitly requires the applicant to have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, as well as protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant must take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The Scottish Ministers, in determining the application, are similarly bound to have regard to these duties. The evidence before the determining authority does not establish that these requirements have been met; there are clear deficiencies and omissions in addressing these statutory obligations. Such failures constitute a conflict with the applicable legal and policy framework and, accordingly, weigh decisively against the granting of consent.

The marine licence application under consideration must be determined in accordance with Part 4 of the Marine (Scotland) Act 2010 and Scotland’s National Marine Plan, as explicitly required by the statutory framework. The National Marine Plan’s General Policies, notably GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts), are integral to the assessment and must be complied with for the application to be lawfully authorised.

The evidence before the determining authority does not demonstrate compliance with these statutory policies. There are clear deficiencies and omissions in the application's submission that fail to satisfy the requirements of the National Marine Plan. In particular, the application does not adequately address the potential impacts on the historic environment, landscape and national scenic areas, and natural heritage as mandated by GEN 6, GEN 7, and GEN 9. Furthermore, the application lacks sufficient engagement evidence as required by GEN 18, and fails to provide sound evidence in accordance with GEN 19 and paragraph 4.81. The cumulative impacts assessment, a critical component under GEN 21 and paragraph 4.85, is also incomplete or absent.

Given these material shortcomings and the absence of demonstrated compliance with the applicable legal and policy framework, the application cannot meet the statutory test for authorisation under the Marine (Scotland) Act 2010. The failure to provide adequate evidence and to address the relevant National Marine Plan policies weighs decisively against the granting of consent. Therefore, the marine licence application should be refused on the grounds that it does not comply with the statutory requirements and relevant policies of the National Marine Plan.

The applicant's submission must be considered in the context of National Planning Framework 4 (NPF4), which is a significant material consideration and is required to be applied alongside relevant statutory duties and legislative requirements. The proposal engages several key policies within NPF4, specifically Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy). These policies set out clear expectations for the protection and enhancement of biodiversity, natural environments, historic assets, and energy considerations, all of which are directly relevant to the assessment of this application.

However, the evidence before the determining authority does not demonstrate compliance with these policies. There are identified deficiencies and omissions in the applicant's submissions that fail to satisfy the requirements of NPF4. In particular, the proposal conflicts with the applicable legal and policy framework governing biodiversity, natural places, historic assets, and energy. As set out in the evidence, where compliance has not been demonstrated or where such conflicts exist, these matters must weigh against the granting of consent. Therefore, the proposal should be refused on the basis that it fails to comply with the key policies of National Planning Framework 4.

The proposal fails to meet the statutory requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which mandate that the likely significant environmental effects of any development must be thoroughly identified, assessed, and reported prior to determination. The submitted documentation does not provide a comprehensive environmental impact assessment that satisfies these legal obligations. This omission is critical, as it prevents the determining authority from making an informed decision based on a full understanding of the potential environmental consequences. Without such an assessment, the proposal is procedurally defective and non-compliant with the established regulatory framework governing environmental impact assessments.

Furthermore, the proposal does not demonstrate compliance with the Habitats Regulations, which require a rigorous assessment of the effects on European protected sites in accordance with the applicable statutory tests. The absence of a proper Habitats Regulations Assessment means that the potential impacts on protected habitats and species have not been adequately considered or mitigated. This failure constitutes a significant legal and policy deficiency. Given that compliance with these regulations has not been demonstrated, and that the evidence reveals clear omissions and conflicts with the relevant legal and policy framework, these matters must weigh decisively against the granting of consent for the proposal.

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

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

The applicant has failed to discharge the fundamental responsibility of demonstrating compliance with all relevant statutory duties, planning policies, and environmental assessment requirements through robust, objective, and proportionate evidence. The submitted documentation does not adequately satisfy the evidential burden necessary to confirm that every applicable legal and policy framework has been met. This failure is critical, as the absence of demonstrated compliance, coupled with identified deficiencies and omissions, directly conflicts with the statutory and policy obligations governing the proposal. In accordance with established principles, such unresolved matters must weigh decisively against the granting of consent. Therefore, on the basis of the applicant's inability to provide the requisite evidence of compliance, the application should be refused.

1.1.66 Conflict with National Planning Framework 4 and the Development Plan

There remains considerable uncertainty as to whether the proposal complies with the impact criteria set out in National Planning Framework 4 (NPF4) Policy 11. While the policy expressly supports renewable energy development, such support is contingent upon adherence to specific impact tests, notably those concerning effects on

communities and the environment. This conditional approach means that renewable energy initiatives must operate within the parameters established by Policy 11, rather than overriding them.

Careful examination reveals that the proposal fails to satisfy these crucial policy requirements. It would result in significant adverse effects on nationally designated landscapes and seascapes, which are afforded strong protection under Policy 11(d) and 11(e). Furthermore, the cultural significance of scheduled monuments and their settings has not been demonstrated to be preserved, raising concerns under Policy 11(c) regarding impacts on communities. The potential harm to island communities has also not been adequately addressed or safeguarded against.

Moreover, the ecological tests embedded within Policy 11 have not been shown to be met based on the evidence submitted. This further undermines the proposal's compliance with the policy and calls into question the overall appropriateness of the development in its current form. Given these substantial uncertainties and conflicts, it is clear that the proposal does not align with the impact criteria fundamental to NPF4 Policy 11.

Policy 11 must be considered alongside other relevant provisions within the National Planning Framework 4, specifically Policy 4(c) and 4(d), which protect National Scenic Areas and nationally important landscapes from significant adverse effects on the qualities for which they are designated. It also operates in conjunction with Policy 7, including Policy 7(h) concerning scheduled monuments and Policies 7(c) and 7(d) relating to the setting of historic assets, as well as Policy 3 on biodiversity. These policies collectively establish a comprehensive framework aimed at safeguarding the natural, cultural, and ecological integrity of nationally important assets.

The proposal, however, fails to comply with these interrelated policies. It would result in significant adverse effects on nationally designated landscapes and seascapes, undermining their protected qualities. Furthermore, there is no demonstrated assurance that the cultural significance of scheduled monuments and their settings will be preserved. The safeguarding of island communities, as required by the relevant policies, has not been evidenced, and the ecological tests set out in Policy 3 have not been shown to be capable of being met based on the submitted evidence. Consequently, the proposal conflicts with multiple policies designed to protect designated assets of national importance and should be considered contrary to the National Planning Framework 4's objectives.

The proposal is found to be in conflict with the terrestrial development plan framework, specifically the Argyll and Bute Local Development Plan 2, in relation to effects experienced on land. It would have an adverse impact on the landscape, heritage, and community interests that these policies are designed to protect. This conflict is clear and significant within the context of the relevant local policies.

Furthermore, this inconsistency extends beyond the local development plan to the National Planning Framework 4 when considered in its entirety. The proposal fails to align with the overarching national policy aims that guide sustainable and appropriate development in this area. The applicant has not provided sufficient evidence to demonstrate that these conflicts can be overcome or mitigated.

In conclusion, given the identified adverse effects and the lack of justification or demonstration to the contrary, it is clear that the proposal does not accord with the relevant terrestrial development plan policies or the broader national planning framework. As such, it should not be supported.

1.1.67 Seascape, Landscape and Visual Effects

The applicant's written methodology, as set out in Appendix 16.1, does not specify a distance threshold beyond which major effects are considered to cease. However, an independently prepared Evidence Note, drawing exclusively on the applicant's Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, irrespective of receptor sensitivity or visibility extent. This implicit role of distance is further demonstrated by the applicant's own documents, which assess a coastal area over 30 kilometres distant by concluding that, given the viewing distance, the scale of change is small. Additionally, the Landscape Character synthesis describes High magnitude effects within about 20 kilometres, Medium effects between roughly 20 and 30 kilometres, and Low effects beyond 30 kilometres for certain landscape types. Consequently, the protective assessments appear to rely on systematically moderated magnitude inputs at precisely the distances where the most sensitive designated landscapes are located. This methodological approach results in conclusions that do not reliably reflect the true effects that the Scottish Ministers are being asked to consider.

While mitigation measures are often presented through visualisation materials to demonstrate their effectiveness, it is important to recognise the inherent limitations of such evidence. NatureScot's visualisation guidance, which has been adopted by the applicant, explicitly acknowledges that printed visualisations cannot fully replicate the scale perceived by a viewer in the field. This means that any assessment based on these materials must consider that the impressions formed may not accurately reflect real-world experience. Furthermore, wireline drawings included within the same panoramic projections share these limitations; they are technical renderings embedded within the visualisation rather than independent tools that correct or enhance the photographic evidence. Therefore, reliance on these visual materials alone is insufficient to comprehensively assess visual impacts, and caution should be exercised in interpreting their significance within the planning evaluation.

The practical consequence of the proposed development is the introduction of aviation and navigation lighting to a previously unlit sea horizon, which will permanently alter the character of the night-time seascape throughout the 35-year operational period. This change is significant because the current unlit condition contributes to the natural seascape character, and the presence of artificial lighting will inevitably diminish this quality for the duration of the wind farm's use.

From a policy perspective, the 35-year operational life does not mitigate the harm caused; rather, consenting to the development signals that the seascape is deemed appropriate for wind farm use despite the adverse impact on its night-time character. This decision sets a precedent for the acceptability of such alterations, which must be carefully weighed against the importance of conserving the seascape's intrinsic qualities.

The proposal fails to comply with key planning policies designed to safeguard nationally important landscape and seascape interests, resulting in unacceptable adverse effects. Specifically, these impacts engage National Planning Framework 4 (NPF4) Policies 4(c), 4(d), 11(d), and 11(e), as well as Policy GEN 7 and paragraph 4.28 of the National Marine Plan. The applicant has not adequately demonstrated that its conclusions regarding the scale of these effects are consistent with its own assessment methodology. Consequently, the proposal does not satisfy the requirements of the relevant policies intended to protect the integrity of nationally significant landscapes and seascapes. Therefore, it should be considered non-compliant with the established policy framework.

1.1.68 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment fails to provide a demonstrable evaluation of how the integrity of setting has been maintained in relation to the proposed development, despite identifying key heritage attributes. Although the assessment details various aspects of visual change—such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—it does not explicitly undertake the critical evaluative step mandated by Historic Environment Scotland's methodology. This omission undermines the reliability of the conclusions drawn regarding the retention of setting integrity.

Historic Environment Scotland's recognised methodology requires an assessment that goes beyond describing visual alterations, demanding a clear evaluation of how changes affect the contribution that the setting makes to the cultural significance of heritage assets. It explicitly advises that visual change alone should not be equated with adverse impact. The applicant's approach, however, stops short of this evaluative requirement, as confirmed by an independent Methodological Audit based solely on the applicant's Appendix 14.3. Consequently, the assessment's conclusion that the integrity of setting is adequately retained lacks substantiated analytical rigour and cannot be accepted without reservation.

While the applicant's assessment acknowledges certain baseline cultural qualities of the heritage assets, it falls short in fully capturing the broader experiential and landscape values essential to their significance. The baseline records identify key attributes such as pilgrimage, arrival by sea, movement through a living cultural landscape, and the interrelationships between monuments, spirituality, and the encompassing landscape and seascape. These qualities are inherently dynamic and are experienced through movement rather than fixed viewpoints. Historic Environment Scotland's consultation responses, as documented in the application, underscore this shortcoming by requesting additional viewpoints to ensure these wider cultural attributes are properly represented. Without adequately addressing these aspects, the assessment risks underestimating the true heritage impacts, thereby weakening the foundation for effective mitigation measures.

The applicant's evidence acknowledges that the heritage conclusions drawn in the proposal are directly reliant on the findings of the landscape assessment. It is specifically noted that where the landscape effects have been understated, as previously demonstrated, this understatement is consequently reflected in and inherited by the heritage impact conclusions. This interdependency undermines the

credibility of the heritage assessment, as any failure to accurately appraise landscape effects inevitably leads to an incomplete or misleading evaluation of heritage impacts. Therefore, the deficiencies identified within the landscape assessment cast significant doubt upon the validity of the heritage conclusions presented.

The application fails to demonstrate compliance with key elements of national policy designed to safeguard heritage assets of international and national importance, notably falling short of the requirements set out in NPF4 Policy 7(h) concerning scheduled monuments, as well as Policies 7(c) and 7(d) on their settings. It also does not satisfy the provisions of GEN 6 or the guidance found in paragraphs 4.22 to 4.23 of the National Marine Plan. This represents a significant shortcoming given the weight these policies afford to the protection of cultural significance.

Critically, the applicant has not provided sufficient evidence to show that the cultural significance of these heritage assets and their surrounding settings will be preserved. The absence of a thorough and conclusive assessment leaves a substantial gap in the information necessary for the Scottish Ministers to make an informed decision. Without this, the potential adverse impacts on these irreplaceable assets cannot be properly understood or mitigated.

In conclusion, the failure to meet these essential policy requirements fundamentally undermines the acceptability of the proposal. It is therefore incumbent upon the decision-making authority to refuse consent on the basis that the protection of nationally and internationally important heritage assets and their settings has not been satisfactorily demonstrated or guaranteed.

1.1.69 Effects on Island Communities, Tourism and the Local Economy

The island communities subject to this proposal rely to an exceptional degree on visitors, whose presence is directly linked to the intrinsic qualities identified in the applicant’s own baselines: landscape, seascape, cultural heritage, tranquillity, and remoteness. These attributes are not incidental but foundational to the islands’ economic vitality, underpinning the visitor economy that sustains local businesses, services, and employment opportunities.

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

The applicant’s own consultants have acknowledged that habitability represents a potentially significant pathway through which the proposal could impact island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 adopts a regional approach, focusing in detail on potential port communities while neglecting a comparable, place-based evaluation of the

island communities directly facing the development. This regional-level assessment nonetheless concludes that these island communities possess low sensitivity to tourism effects.

Such a conclusion warrants scrutiny, as small island economies differ markedly from regional averages. These economies are typically concentrated in sectors that are highly vulnerable to changes in the qualities attracting visitors. Moreover, their reliance on increasing visitor numbers does not mitigate this vulnerability; rather, it intensifies dependence on the very qualities that the proposal risks altering. Therefore, the conclusion of low sensitivity—arrived at without a place-based analysis—is not substantiated by evidence but constitutes an assumption. Consequently, the socio-economic assessment methodology employed is flawed and insufficient to adequately understand or mitigate the potential impacts on island communities.

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

1.1.70 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, indicating its high ecological value and sensitivity. Additionally, the surrounding waters are known to support important species such as seabirds, marine mammals, and basking sharks, underscoring the environmental significance of the site.

Introducing construction, operational, and decommissioning activities at a very large scale over several decades into this sensitive marine environment carries the potential for significant adverse environmental effects. This raises substantial concerns regarding the long-term ecological impact of the proposed development.

The applicant’s submission of a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan signals recognition of potential adverse impacts on the North Colonsay and Western Cliffs Special Protection Area, specifically concerning the guillemot population. Such documents are customarily prepared in circumstances where the integrity of a protected site cannot be confidently assured, indicating that the applicant does not rule out the possibility of an adverse effect. Moreover, the inclusion of these plans acknowledges that Scottish

Ministers may reach a different conclusion regarding impacts on site integrity than the applicant. This submission is therefore a critical element of the application, intended to address potential adverse effects through derogation provisions and compensation measures, albeit without definitive assurance that such impacts can be fully avoided.

The legal framework governing developments that may affect protected habitats and species is clearly defined under the Habitats Regulations. These regulations stipulate that consent for such proposals can only be granted if the competent authority is satisfied that the development will not adversely affect the integrity of the protected site, unless the stringent derogation tests are met. Crucially, the law requires that consent may only be lawfully granted where no reasonable scientific doubt remains regarding the absence of adverse effects. This places a significant evidential burden on the applicant to demonstrate compliance. Importantly, mitigation measures, compensation proposals, and future monitoring cannot, in isolation, be relied upon to satisfy the statutory tests set out by the regulations.

This legal requirement is further reinforced by relevant planning policies, including GEN 9 and GEN 13 of the National Marine Plan, as well as specific policies within the Scottish Government's National Planning Framework 4 (NPF4), namely Policies 3, 4(b), 4(e), and 4(f). These policies collectively underpin the necessity for rigorous scientific evidence and a precautionary approach in decision-making relating to developments affecting protected natural environments. Their inclusion underscores the integrated approach between habitat protection legislation and marine spatial planning objectives, ensuring that environmental considerations are central to the assessment process.

Given the high standard of proof required by both law and policy, it is essential that any application seeking consent under these provisions presents robust, unequivocal scientific evidence demonstrating no likely adverse effect on the integrity of the site. Without this, the statutory tests are not met, and consent should not be granted. This framework serves to safeguard protected habitats effectively, ensuring that environmental protection is not compromised by uncertain or insufficient evidence. It is therefore appropriate that decision-makers apply these legal and policy requirements stringently in their assessments.

The applicant's submission fails to demonstrate compliance with the statutory tests intended to protect internationally important habitats and species, as evidenced by their own derogation documents. These documents reveal a lack of sufficient certainty that the legal requirements can be met, which is critical when considering the potential impacts on such ecological features.

Given this insufficiency, the case for granting consent is fundamentally undermined. Without clear assurance that the statutory protections will be satisfied, the proposal cannot be deemed legally compliant or environmentally responsible. Consequently, the application should not be approved in its current form.

1.1.71 Cumulative and In-Combination Effects

The practical consequence of considering only a portion of the project at this stage is that a comprehensive evaluation of its overall impacts is fundamentally undermined. The export cable corridor and the onshore transmission works, which are essential for the wind farm's operation, are not included in the current application but are instead deferred to future consenting processes. This fragmentation means that the Scottish Ministers are making decisions without full knowledge of the cumulative effects, potentially overlooking significant environmental and operational implications that only become apparent when all components are assessed together.

This approach runs counter to established legal principles governing environmental assessment. The courts, notably in the Raeshaw Farms case, have affirmed that a project must be assessed in its entirety rather than being divided into smaller parts whose individual impacts might appear less significant. By effectively "salami-slicing" the project, the current methodology diminishes the perceived scale and consequence of the development, which could result in inadequate mitigation measures and insufficient scrutiny of the project's true footprint and effects on the environment and local communities.

Therefore, it is imperative that the assessment process be reconsidered to encompass all interdependent elements of the project simultaneously. Only through a holistic evaluation can decision-makers fulfil their statutory duties and ensure that all potential impacts are properly identified, understood, and addressed. Failing to do so risks setting a precedent that undermines the integrity of the planning system and the protections it affords to the environment and public interest.

While mitigation measures are often highlighted to address environmental impacts, it is critical to scrutinise the reliability of the cumulative impact assessment itself. The assessment relies fundamentally on baseline data derived from the Environmental Impact Assessment, which has been shown to understate effects on landscape, heritage, and socio-economic factors. Because the cumulative assessment uses this reduced baseline, the combined effects of the current proposal alongside existing, consented, and foreseeable developments are similarly underestimated. Consequently, the cumulative impact assessment cannot be regarded as a reliable indicator of the true extent of combined effects, undermining confidence in its conclusions.

The applicant's failure to adequately address the cumulative and in-combination effects of the proposal falls short of the mitigation standards required by relevant planning policies and environmental regulations. This deficiency engages GEN 21 and paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), as well as the Environmental Impact Assessment Regulations concerning project splitting. Crucially, the assessment does not reliably identify or evaluate the overall effects of the project, including deferred works. It is therefore imperative that the decision-making process explicitly considers these deferred elements to ensure full compliance with policy and regulatory requirements.

1.1.72 Public Engagement, Site Selection and Environmental Information

When comparing the consultation process for this application to the standards set by GEN 18 of the National Marine Plan and the principles of effective public

participation enshrined in the Aarhus Convention, it is evident that the affected communities have not been afforded a realistic opportunity to engage meaningfully with decisions of such magnitude. The applicant seeks significant weight to be given to the site-selection process; however, this process's legitimacy is undermined by persistent deficiencies in public participation, which have carried through from the plan and site-selection stages into the current application phase.

The consultation coincided with the busiest months for island communities, a period when residents are occupied with continuous work throughout the visitor season and when access to specialist advice is particularly limited. Meanwhile, the applicant has had years, alongside substantial professional and financial resources, to prepare its extensive technical submission comprising thousands of pages. Under these conditions, the affected communities have been placed at a distinct disadvantage, falling short of the standards expected for effective participation. This disparity should be a crucial consideration for Ministers when evaluating the representations submitted.

The Environmental Impact Assessment submitted with the application fails to provide sufficient information for the Scottish Ministers to make a fully informed decision. While it identifies potential pathways to significant environmental effects across multiple topics, the assessment does not investigate these impacts comprehensively. For example, the landscape assessment employs a distance pattern not supported by its own methodology, the heritage assessment neglects to apply its established integrity test, and the socio-economic assessment omits place-based analysis relevant to the affected islands. Furthermore, the application frequently relies on future assessments, post-consent plans, ongoing monitoring, and additional approvals, none of which satisfy the EIA Regulations' requirement that likely significant effects be thoroughly understood prior to determination. The Scottish Ministers must base their decision on the evidence currently before them, not on the expectation that unresolved issues will be addressed satisfactorily at a later stage. Consequently, the applicant has not demonstrated that the environmental information submitted is adequate for the purposes of determination.

1.1.73 Effects on Local Area

The applicant's assessment significantly underestimates the direct and substantial effects of the proposed development on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby undermining the reliability of the environmental and heritage impact evaluation. Although Islay and Colonsay are the closest islands to the development area, which lies immediately north-west of Islay and west of Colonsay, the application primarily considers Islay only as a potential project location. It fails to evaluate Islay as an affected island community in its own right, neglecting a place-based assessment of the impacts on its Atlantic-facing communities, which directly face the nearest edge of the 448 square kilometre development area. This omission disregards potential effects on the islands' setting, economy, and community life.

For Colonsay and Oronsay, the seaward outlook—integral to daily life—faces the development array directly. Notably, the North Colonsay and Western Cliffs Special Protection Area, which forms part of Colonsay's coastline, is central to the

applicant's derogation case and compensation plan. This area is the clearest acknowledgment within the application that harm to the internationally protected seabird population of these cliffs cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance situated within this community's area, is subject to the same deficiencies identified in the heritage assessment, particularly concerning the treatment of its open maritime setting. Taken together, these points demonstrate that the applicant's evaluation lacks the necessary rigour and comprehensiveness to fully capture the scale and nature of effects on these vulnerable island communities and their heritage assets.

The applicant's Coastal Character assessment recognises the Sound of Iona as an area of high sensitivity, noting its direct orientation towards the proposed development, extensive visibility, and a large geographical extent of change. The assessment quantifies the overall effect as moderate and significant, with visibility extending approximately 21 kilometres and turbines occupying around 39 degrees of the horizon. This finding is consistent with the high sensitivity attributed to the west coast of Iona, where widespread visibility is similarly acknowledged. The applicant concedes that significant effects will be experienced by residents and visitors across much of the island, including at Dùn Ì, the island's highest point.

Despite these acknowledgements, the assessment falls short in fully capturing the scale and significance of the impacts on Iona's internationally important monastic landscape. The Abbey, the Nunnery, and the high crosses are central to the heritage value of the island, with their significance closely tied to pilgrimage, arrival by sea, and movement through the landscape as established in the applicant's own baseline evidence. Historic Environment Scotland's request for additional viewpoints, including from the ferry crossing between Fionnphort and Iona, was not comprehensively addressed; notably, no visualisation is provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, a location of particular heritage relevance.

Community concerns further underscore the gravity of the potential impacts. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal. The applicant's own consultants identify habitability as a potential pathway of effect on the community, yet this crucial aspect was never assessed, leaving a significant gap in the social impact evaluation. The perceived scale of the development can be further contextualised by comparison with a familiar local landmark: Ben Hynish on Tiree, standing at 141 metres and visible from Iona at approximately 33 kilometres, would be dwarfed by the largest turbines, which would exceed Ben Hynish's height by around 194 metres and be located at roughly two-thirds of that distance.

In summary, while the applicant recognises some significant effects on Iona, the assessment underestimates the extent and importance of visual, community, and heritage impacts. This results in an incomplete and potentially misleading environmental and social impact evaluation, which must be addressed to ensure that the full implications for Iona are properly understood and mitigated.

While the applicant acknowledges significant visual effects at key locations such as Erraid, the Core Paths of the Ross of Mull, and Fionnphort—the gateway to Iona and

crucial to the visitor experience—their assessment attributes only medium magnitude effects despite recognising high sensitivity in these areas. This approach suggests a mitigation comparison that underestimates the true scale of impact on communities most directly tied to visitor flows. The acceptance of significant effects here contrasts with a seemingly inconsistent application of significance across other sensitive areas.

Further scrutiny reveals that although the applicant concedes significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Areas, as well as the Loch na Keal National Scenic Area—an area of high sensitivity spanning approximately 21 to 33 kilometres—the effects are again limited to medium magnitude. This assessment appears to rely heavily on distance as a mitigating factor rather than fully accounting for the intrinsic value and interrelated character of these designated landscapes. For example, the treatment of the Wilderness and Gribun Rocks coastal area, where changes at distances exceeding 30 kilometres are deemed small, exemplifies this distance-based reasoning that may downplay the project's visual and experiential consequences.

Moreover, the applicant’s assessment does not adequately address the broader economic and community impacts on Mull’s western coastal townships, whose tourism economy and wildlife boat operations are intimately connected to the Atlantic seascape that the development would industrialise. None of these communities has received a place-based assessment, leaving a significant gap in understanding how the project would affect livelihoods and landscape appreciation in areas dependent on the natural environment. In sum, the assessment underrepresents the cumulative visual, economic, and community impacts on Mull and the Ross of Mull, particularly regarding designated landscapes and tourism-reliant communities, warranting a more thorough and place-specific evaluation.

The applicant’s assessment acknowledges the presence of several designated landscapes within the wider seaboard area, including the Loch na Keal National Scenic Area, which encompasses the islands of Ulva and Staffa, as well as the Jura and Scarba, Lunga and the Garvellachs National Scenic Areas. Ulva, a community-owned island situated within Loch na Keal, is highlighted as a small, re-establishing community whose regeneration relies heavily on the unspoilt seascape and natural setting. Notably, the applicant’s assessment does not include any specific evaluation of the effects on Ulva, thereby omitting consideration of impacts on a vulnerable island community dependent on the very qualities at risk. Staffa, also within the Loch na Keal National Scenic Area and located approximately 35 kilometres from the proposed development, is recognised for its panoramic maritime qualities and status as one of Europe’s most celebrated small islands. Despite this, the applicant concludes that the scale of change would be small and not significant, even though this lies beyond the 30-kilometre threshold NatureScot suggested for assessing impacts on National Scenic Area qualities.

The Jura National Scenic Area, characterised by its wild and undeveloped Atlantic outlook, is assessed by the applicant as having high sensitivity at a distance of approximately 28 to 32 kilometres from the development site. However, the magnitude of impact is rated only as medium to low, primarily justified by distance, apparent scale, and retention of landforms. A similar approach is applied to the

Scarba, Lunga and the Garvellachs National Scenic Area, situated 35 to 40 kilometres away, receiving the same moderate treatment. This approach underestimates the potential significance of effects on these designated landscapes by placing disproportionate weight on distance and visual scale without fully accounting for the intrinsic qualities that underpin their designation. Consequently, the assessment fails to adequately protect the natural and cultural characteristics of these important seaboard landscapes and their associated island communities.

The applicant's assessment notably understates the magnitude of change experienced on Tiree when compared to the level of sensitivity attributed to the island's landscape. While the South Tiree coastal area is correctly identified as having High sensitivity at approximately 35 kilometres, it is paradoxically assigned a Low magnitude of change. This assessment fails to account adequately for Tiree's exceptional landscape character, which is defined by its exceptionally low-lying topography and the dominance of sea and sky. With the highest point, Ben Hynish, standing at only 141 metres, the introduction of turbines reaching up to 335 metres would create unprecedented vertical structures within the seascape. Given that Tiree's character depends on an open oceanic horizon, the presence of such large turbines would cause a significant and conspicuous change. Therefore, the conclusion of a Low magnitude of change for such a highly exposed and sensitive receptor is an understatement and renders the overall evaluation of effects unreliable.

While the applicant's assessment applies distance-based mitigation to certain visual receptors, it fails to address significant effects on mainland and island communities whose seascape views and economic well-being are directly tied to the development area. For instance, the community-owned island of Gigha, celebrated nationally for its regeneration, faces the development waters from the east; yet, the impact on its delicate community balance and local economy remains unexamined. Similarly, Ardnamurchan Point—the westernmost tip of the British mainland—offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula, yet these important seaward panoramas are subject only to the distance-based moderation critiqued here. Moreover, the chain of communities along the west coast of Kintyre, whose outlook, character and visitor economy are shaped by the open Atlantic seaboard towards Islay, Jura and surrounding waters, alongside the Treshnish Isles and nearby mainland coasts, share this unassessed vulnerability. Consequently, the applicant's approach compromises the comprehensiveness of the assessment by omitting these key receptors, undermining confidence in its conclusions.

The applicant's assessment systematically moderates and discounts the magnitude of change affecting highly sensitive receptors located beyond approximately 20 kilometres. This approach results in a quantified underestimation of environmental effects on these receptors, as the assessment reduces the perceived significance of impacts solely based on distance. Such a methodology fails to account adequately for the true extent of change experienced by these communities.

Consequently, the effect on populations living beyond this arbitrary threshold remains insufficiently evaluated. These communities, which bear the consequences of the development, have received no place-based assessment to reflect their

specific circumstances and sensitivities. This omission undermines the thoroughness and accuracy expected in a robust environmental impact assessment.

In summary, the applicant's distance-based approach compromises the integrity of the assessment by systematically discounting effects beyond 20 kilometres without proper justification. For the assessment to be comprehensive and reliable, it must address the significant impacts on all sensitive receptors irrespective of distance, ensuring that all affected communities are properly considered.

1.1.74 Summary

The proposal submitted fails to demonstrate compliance with the relevant statutory and policy frameworks governing its determination. The applicant's own assessment acknowledges significant impacts on nationally designated landscapes, as well as on the coastal communities and their heritage. Furthermore, analysis of the applicant's published documents reveals that these impacts have been understated. Crucially, the necessary heritage assessment has not been undertaken. Although the effects on the island communities affected by the project were identified, they have never been properly evaluated. Additionally, the ecological criteria required for consent have not been proven achievable. It should also be noted that only a portion of the development is currently before the Scottish Ministers for consideration.

In light of these deficiencies, it is respectfully urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm proposal, along with the associated marine licence application.

Should the Ministers decide against refusal, it is requested that they require the submission of further environmental information and enhanced visualisations. It is also recommended that the applications be determined only following a public inquiry, during which the issues raised in this objection can be thoroughly scrutinised. Regardless of the final decision, it is further requested that the Ministers explicitly state their conclusions concerning the impacts on cultural heritage and the affected island communities within their stated reasons.

Yours faithfully,

[Redacted]

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

Member of the public 509
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, which are the subject of applications 00012385 for consent under section 36 of the Electricity Act 1989, and 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. These applications have been lodged by MachairWind Limited, trading as ScottishPower Renewables. I request that this correspondence be recognised as a formal objection, that I am duly registered as an objector, and that I receive notification of the final determination regarding these applications.

The proposals envisage the development of an offshore wind farm with an estimated capacity of approximately 2 gigawatts. This facility would consist of between 91 and 144 turbines, each with a maximum height of up to 335 metres to blade tip. The project site encompasses a designated Windfarm Development Area extending over roughly 448 square kilometres of marine environment situated north-west of Islay and west of Colonsay. It is located approximately 21 kilometres from Iona and lies in proximity to the islands and coastal settlements within the southern Hebrides.

The following sections outline the grounds for objection, grounded firmly in the statutory and policy context applicable to the determination of these applications. It is important to emphasise that the onus lies with the applicant to provide adequate and compelling evidence demonstrating that all relevant statutory tests and policy requirements are met. The burden of proof does not rest with objectors to disprove the proposals. Having carefully considered the submissions and supporting documentation, it is evident that the applicant has failed to satisfy this evidentiary burden. Therefore, for the reasons elaborated below, it is concluded that consent for the proposed development ought to be refused.

1.1.75 Seascape, Landscape and Visual Effects

The applicant’s assessment methodology fails to specify any distance threshold beyond which major effects are considered to cease. Nevertheless, analysis of the applicant’s Chapter 16 and Appendices 16.1 to 16.3 reveals a clear pattern: no highly sensitive receptor situated more than approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of the receptor’s sensitivity or the extent of visibility. This indicates a de facto limitation embedded within the assessment, constraining the recognition of significant impacts to receptors within this 20-kilometre radius.

Further scrutiny of the applicant’s own documents confirms the influence of distance on the assessment outcomes. For instance, a coastal area located over 30 kilometres from the development is judged to experience only a small scale of change due to viewing distance. Similarly, the Landscape Character synthesis categorises impact magnitude as High within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. This systematic moderation of magnitude precisely at distances where the most sensitive designated landscapes are found results in protective tests being applied to understated inputs. Consequently, the conclusions presented do not

provide a reliable description of the effects for which Scottish Ministers are being asked to grant consent.

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

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

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

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

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

The proposal fails to comply with the requirements of key planning policies designed to safeguard landscape and seascape interests. Specifically, the effects identified engage NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. Despite recognising these effects, the applicant has not demonstrated that its conclusions regarding their scale are consistent with its own assessment methodology. Furthermore, no evidence has been provided to show compliance with the policies protecting nationally important landscapes and seascapes. On this basis, it is clear that the proposal does not meet the necessary policy standards and should not be supported.

1.1.76 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of heritage impacts fails to comply with the required methodology, thereby undermining the reliability of its conclusions regarding the integrity of setting. Although the applicant adopted Historic Environment Scotland's recognised methodology—which mandates evaluating whether changes affect the contribution setting makes to cultural significance and whether the integrity of setting is adequately retained—it stops short of fulfilling these requirements in practice. The applicant's assessment primarily describes visual changes, focusing on visibility, distance, monument prominence, retained views, screening, and skyline occupation. However, as demonstrated by the Methodological Audit prepared in support of community objections, these descriptive elements do not amount to the critical evaluative step the methodology demands. The Audit, working solely from the applicant's Appendix 14.3, highlights that the assessment does not explicitly demonstrate how the integrity of setting has been assessed in accordance with the methodology. Without this essential evaluation, the conclusion that the integrity of setting is adequately retained lacks evidential foundation. Consequently, the assessment's failure to apply the methodology properly calls into question the validity of its heritage impact conclusions.

The applicant's baseline assessment acknowledges that the cultural significance of the affected heritage assets is intrinsically linked to experiential qualities such as pilgrimage, arrival by sea, and movement through a living cultural landscape. This significance arises from the dynamic relationships between monuments, spirituality, and the encompassing landscape and seascape, which are fundamentally experienced through movement rather than static viewpoints. Such recognition underscores the importance of evaluating heritage impacts within the context of the broader cultural landscape and the lived experience it offers.

Nevertheless, Historic Environment Scotland's consultation responses, as documented in the application, highlight a concern that the applicant's assessment may not fully capture these wider qualities. In particular, they requested additional viewpoints to ensure that the comprehensive cultural and experiential dimensions are properly represented. This suggests that the current assessment framework may inadequately reflect the full baseline qualities, thereby limiting the robustness of heritage impact evaluation. Addressing this gap is essential to accurately appraise the significance and potential effects on the heritage assets in their cultural context.

The mitigation measures proposed rely heavily on the findings of the landscape assessment. However, as the landscape effects have been understated, as previously detailed, the heritage impact conclusions that depend on this assessment are similarly compromised. This interdependence means that any deficiency in the landscape evaluation directly undermines the credibility of the heritage conclusions derived from it. Consequently, the overall assessment of heritage impacts cannot be fully relied upon without addressing these fundamental shortcomings in the landscape analysis.

There remains significant uncertainty regarding the extent to which the proposed development complies with established policies intended to safeguard heritage assets. This uncertainty is particularly acute in relation to NPF4 Policy 7(h), which

addresses scheduled monuments, alongside Policies 7(c) and 7(d), which concern the preservation of their settings. These provisions are further supported by GEN 6 and the guidance contained within paragraphs 4.22 to 4.23 of the National Marine Plan. The application's failure to explicitly address these elements raises concerns that essential policy requirements have not been fully engaged or satisfied.

Critically, the applicant has not provided sufficient evidence to demonstrate that the cultural significance of heritage assets—both those of international and national importance—and their settings will be adequately protected. The absence of a thorough assessment precludes the Scottish Ministers from being in possession of the necessary information to conclude that heritage interests are properly considered and preserved. In light of this, the application falls short of meeting key policy obligations for heritage protection, thereby undermining its overall acceptability. It is therefore appropriate that the application be refused on these grounds.

1.1.77 Effects on Island Communities, Tourism and the Local Economy

Mitigation measures proposed in support of the development fail to adequately address the fundamental reliance of the island communities on the qualities that attract visitors. While attempts may be made to reduce direct environmental impacts, such efforts cannot compensate for the profound alteration to the landscape, seascape, cultural heritage, tranquillity, and remoteness that underpin the islands' appeal. The applicant's own baseline assessments confirm these attributes as key visitor draws, yet the proposal would inevitably diminish them in ways that cannot be fully mitigated.

This dependence is exceptional and integral to the economic and social sustainability of the island communities. Any adverse change to these visitor-attracting qualities strikes at the very economic base of these communities, undermining not only local services and employment but also population retention and overall community viability. The proposal therefore presents a significant threat to the long-term sustainability of the islands, a risk that cannot be offset by partial mitigation measures.

The applicant's own consultants acknowledge that habitability represents a potentially significant pathway through which the proposed development could impact island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 is conducted at a regional scale, focusing in detail on port communities but omitting a comparable place-based analysis for the island communities directly facing the development. This assessment nonetheless concludes that these island communities exhibit low sensitivity to tourism effects.

This approach is problematic because small island economies are not accurately represented by regional averages. Such economies are typically concentrated in sectors that are highly vulnerable to changes in the attributes attracting visitors. Furthermore, reliance on increasing visitor numbers does not diminish this sensitivity; rather, it intensifies the dependence on the very qualities that may be compromised by the development. Consequently, the conclusion of low sensitivity, derived without specific place-based analysis, lacks evidential support and amounts

to an unsubstantiated assumption. Therefore, the socio-economic assessment methodology employed is insufficient to fully understand or mitigate the impacts on island communities.

The proposal fails to meet the mitigation standards required to protect island communities, as it lacks the necessary assessment and evidence to demonstrate compliance with relevant policy and statutory duties. Specifically, it does not satisfy the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions be founded on robust socio-economic evidence and adopt a precautionary approach when such evidence is insufficient. Furthermore, the proposal does not align with NPF4 Policy 11(c) nor the obligations under the Islands (Scotland) Act 2018, both of which insist on thorough evaluation and meaningful engagement with island communities throughout the planning process. The applicant acknowledged that island communities warrant particular scrutiny but failed to undertake the comprehensive assessment needed to understand the proposal's effects on these communities. Consequently, it has not been demonstrated that the development is compatible with the sustainability of island communities, nor that the statutory duties owed to them have been properly discharged. This non-compliance undermines the proposal's acceptability in planning terms.

1.1.78 Ecology, Biodiversity and Habitats Regulations

There remains considerable uncertainty regarding the full extent of ecological impacts arising from the proposed development within this sensitive marine environment. The area in question encompasses Priority Marine Features and Annex I habitats, which are recognised for their ecological importance. Moreover, the surrounding waters provide habitat for a range of protected species including seabirds, marine mammals and basking sharks.

The scale of the proposal is significant, with construction, operation and eventual decommissioning activities projected to take place over several decades. Introducing such sustained and large-scale human activity into an environment of high ecological sensitivity raises concerns about potential adverse effects, which have yet to be satisfactorily addressed. The cumulative and long-term consequences on the integrity of the Priority Marine Features and associated species warrant thorough scrutiny.

Given the recognised environmental value of the site and the scale of the proposed works, careful consideration must be given to the potential for significant harm. It is essential that any planning decision fully accounts for the ecological sensitivities and ensures that adequate measures are in place to avoid or mitigate adverse impacts throughout the lifetime of the development.

The applicant's submission includes both a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan, specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are typically prepared when there is a possibility that the project may have an adverse effect on the integrity of a protected site. Their inclusion in this application indicates the applicant's recognition of potential impacts that cannot be definitively ruled out. Importantly, the submission of these documents

also acknowledges that the Scottish Ministers might ultimately reach a different conclusion regarding the presence of adverse effects. In this context, the applicant's approach demonstrates an awareness of the sensitivities involved and provides a framework for mitigation and compensation measures should they be deemed necessary. This reflects a responsible stance, though the final determination of adverse impact remains subject to ministerial assessment.

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

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

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

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

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

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

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

1.1.79 Cumulative and In-Combination Effects

The current assessment before the Scottish Ministers addresses only a portion of the proposed development, explicitly excluding the export cable corridor and the onshore transmission works that are essential for the wind farm's operation. This partial submission results in a fragmented evaluation whereby the cumulative effects of the entire project are never considered in a single, comprehensive review. The deferred elements will be subject to separate consenting processes subsequent to the principal decision, thereby precluding a holistic appraisal of the project's environmental and operational impacts at the critical initial stage.

Such an approach is fundamentally at odds with established legal principles, notably those upheld by the courts in Raeshaw Farms, which require that a project be assessed in its entirety rather than segmented into smaller components with individually diminished apparent effects. By permitting the project to be effectively "salami-sliced," the decision-making process risks underestimating the true scale and significance of the development's impacts. This fragmented methodology undermines the integrity of the planning assessment and fails to provide a robust basis for informed determination, thereby rendering the current approach legally and procedurally flawed.

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

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

There remains significant uncertainty regarding the applicant's compliance with key planning policies and environmental regulations, specifically concerning project splitting and the assessment of cumulative effects. The proposal fails to demonstrate that the cumulative and in-combination effects, as well as the overall impacts of the project, have been reliably identified and assessed in accordance with GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the EIA Regulations. This lack of clarity undermines confidence in the environmental impact appraisal and the robustness of the decision-making process.

Furthermore, the applicant has not explicitly addressed how deferred works will be treated within the determination, leaving a critical gap in the evaluation of potential

adverse effects. It is essential that these deferred elements receive explicit consideration to ensure full compliance with statutory requirements and to provide decision-makers with a comprehensive understanding of the project's total impact. In light of these shortcomings, it is requested that the treatment of deferred works be expressly addressed before any approval is granted.

1.1.80 Public Engagement, Site Selection and Environmental Information

While mitigation measures may address certain environmental concerns, the fundamental deficiencies in public participation and consultation timing critically undermine the legitimacy of the site-selection process. The applicant requests that Scottish Ministers place significant weight on this process; however, the quality of public engagement throughout both the plan and site-selection stages has been inadequate and has persisted into the application phase. The application itself consists of thousands of pages of technical material, yet the consultation period was scheduled during the busiest months for island communities—when residents are occupied with continuous work throughout the visitor season and access to specialist advice is limited. This contrasts sharply with the applicant's extensive preparation time, supported by substantial professional and financial resources. National Marine Plan policy GEN 18 and the principles of effective public participation, as enshrined in the Aarhus Convention, mandate that those affected must have a realistic opportunity to engage in decisions of this scale. The conditions imposed on the affected communities have fallen short of this standard, and Ministers are urged to consider this firmly when evaluating the representations submitted.

There remains significant uncertainty as to whether the Environmental Impact Assessment (EIA) submitted is sufficient to enable the Scottish Ministers to make a fully informed decision on this application. While the EIA is extensive in scope, it falls short in critical respects. Across multiple topics, the assessment identifies potential pathways to significant effects but either fails to investigate them comprehensively or employs methodologies that do not substantiate its conclusions. For example, the landscape assessment produces outcomes based on a distance pattern that is not supported by its own stated methodology; the heritage assessment lacks clear demonstration of applying its integrity test; and the socio-economic assessment omits any place-based analysis of the islands directly affected. Moreover, the applicant frequently defers key matters to future stages—relying on post-consent plans, monitoring, and additional approvals—which does not satisfy the EIA Regulations' requirement that likely significant effects must be understood prior to determination. Ultimately, the Scottish Ministers are obliged to decide on the evidence currently before them, not on assumptions that outstanding issues will be resolved later. In this regard, the applicant has not demonstrated that the environmental information provided is adequate for the purpose of making a sound and lawful decision.

1.1.81 Effects on Local Area

The applicant's assessment significantly underestimates the direct and substantial effects that the proposed development would have on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Although Islay and Colonsay lie closest to the development area—which extends immediately north-west of Islay and

west of Colonsay—the application primarily considers Islay from the perspective of its potential use as a project location rather than as an impacted island community in its own right. Crucially, the Atlantic-facing communities of Islay confront the nearest edge of a 448 square kilometre development zone, yet there is no place-based evaluation of how this proximity would affect their local setting, economic activities, or community life. This absence undermines the reliability of the environmental and heritage impact assessment for these islands.

For Colonsay and Oronsay, the situation is equally concerning. The seaward outlook that shapes daily life on these islands directly faces the proposed development array, with Colonsay's coastline designated as the North Colonsay and Western Cliffs Special Protection Area. This area is central to the applicant's derogation case and compensation plan, implicitly recognising that harm to the internationally protected seabird populations here cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance situated within this community's area, has not been adequately considered, particularly regarding the impact on its open maritime setting. The deficiencies previously identified in the heritage assessment are fully applicable here, further calling into question the thoroughness and accuracy of the applicant's evaluation.

The applicant's Coastal Character assessment recognises the Sound of Iona as an area of high sensitivity, noting its direct orientation towards the proposed development, extensive visibility, and a large geographical extent of change. The assessment quantifies the overall effect as moderate and significant, with visibility extending approximately 21 kilometres and turbines occupying around 39 degrees of the horizon. This finding is consistent with the high sensitivity attributed to the west coast of Iona, where widespread visibility is similarly acknowledged. The applicant concedes that significant effects will be experienced by residents and visitors across much of the island, including at Dùn Ì, the island's highest point.

Despite these acknowledgements, the assessment falls short in fully capturing the scale and significance of the impacts on Iona's internationally important monastic landscape. The Abbey, the Nunnery, and the high crosses are central to the heritage value of the island, with their significance closely tied to pilgrimage, arrival by sea, and movement through the landscape as established in the applicant's own baseline evidence. Historic Environment Scotland's request for additional viewpoints, including from the ferry crossing between Fionnphort and Iona, was not comprehensively addressed; notably, no visualisation is provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, a location of particular heritage relevance.

Community concerns further underscore the gravity of the potential impacts. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal. The applicant's own consultants identify habitability as a potential pathway of effect on the community, yet this crucial aspect was never assessed, leaving a significant gap in the social impact evaluation. The perceived scale of the development can be further contextualised by comparison with a familiar local landmark: Ben Hynish on Tiree, standing at 141 metres and visible from Iona at approximately 33 kilometres, would be dwarfed by the largest turbines, which would

exceed Ben Hynish's height by around 194 metres and be located at roughly two-thirds of that distance.

In summary, while the applicant recognises some significant effects on Iona, the assessment underestimates the extent and importance of visual, community, and heritage impacts. This results in an incomplete and potentially misleading environmental and social impact evaluation, which must be addressed to ensure that the full implications for Iona are properly understood and mitigated.

The applicant's assessment fails to adequately recognise the significant practical consequences for the communities and landscapes of Mull and Ross of Mull, particularly those reliant on tourism and the integrity of designated scenic areas. Notably, the Ross of Mull South coastal area, identified as having High sensitivity at distances of approximately 22 to 24 kilometres, is assigned only a Medium magnitude of effect. Despite this, the applicant acknowledges significant impacts at Erraid and on the Core Paths of the Ross, as well as at Fionnphort—an essential gateway to Iona and a focal point for visitor flow—yet no place-based assessment has been undertaken to address the direct community implications. Similarly, across Mull, significant effects are accepted on Core Paths and within the Central, South and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, of High sensitivity over distances of approximately 21 to 33 kilometres, is nonetheless attributed no greater than Medium magnitude, a conclusion that appears inconsistent with the area's recognised landscape importance. The applicant's reliance on distance-based reasoning is exemplified by the treatment of the Wilderness and Gribun Rocks coastal area, where effects are judged small solely because the viewing distance exceeds 30 kilometres, disregarding the qualitative nature of the seascape and its value. Crucially, the west-facing tourism economy of Mull, including wildlife boat operations and accommodation providers in its western townships, depends on the unindustrialised Atlantic seascape that would be altered by the development; yet, none of these communities has been subject to a specific, place-based impact assessment. In sum, the applicant's assessment materially underestimates the visual, economic and community effects on Mull and Ross of Mull's coastal landscapes and fails to provide the detailed, location-specific analysis necessary to inform a fully informed planning decision.

The applicant's assessment of the impacts on wider seaboard designated landscapes and island communities appears to understate the significance of effects, particularly when considering the scale of potential mitigation compared to the inherent qualities of these areas. For example, while the applicant acknowledges the panoramic maritime qualities of Staffa, located approximately 35 kilometres from the development area and within the Loch na Keal National Scenic Area, it concludes that the scale of change there would be small and the effect not significant. This conclusion is reached despite Staffa lying beyond the approximate 30 kilometre distance to which NatureScot advised the assessment of effects on National Scenic Area qualities should extend, suggesting that the assessment may not fully account for the broader seascape impact.

Similarly, the Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is described as having high sensitivity within a range of approximately 28 to 32 kilometres from the development, yet the applicant attributes

only a medium to low magnitude of effect. This moderation is explained by distance, apparent scale, and retained landforms; however, such an approach risks undervaluing the fundamental qualities that underpin Jura's designation. The same rationale is applied to the Scarba, Lunga and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres from the site, where the applicant's assessment likewise limits the magnitude of effect without thoroughly addressing the cumulative impacts on these sensitive seascapes.

Of particular concern is the omission of any specific assessment of Ulva, a community-owned island within the Loch na Keal National Scenic Area that shares fully in the effects on that designated landscape. Ulva is a small, re-establishing community whose recovery depends on the unspoilt qualities of its setting and surrounding seascape. The absence of dedicated consideration for Ulva's unique social and environmental context undermines the protection of its natural and cultural qualities. Overall, the applicant's approach tends to underestimate significant effects on both designated landscapes and vulnerable island communities, thereby weakening the safeguard of their important attributes.

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

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

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

While the applicant's assessment attempts to moderate effects based on distance, this approach inadequately addresses the significant impacts experienced by mainland and island communities with direct visual and economic connections to the seascape. For instance, Gigha, a community-owned island renowned as a national symbol of island regeneration, faces the development waters directly to the east. Despite its finely balanced community and economy, the effects on Gigha have not been examined, leaving a critical gap in understanding the development's local influence. Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the receptors affected by the distance-based mitigation approach the applicant employs, yet their significance is not fully acknowledged. Furthermore, the west coast of Kintyre comprises a chain of communities whose identity and visitor economy are intimately

tied to the open Atlantic seaboard facing Islay, Jura, and surrounding waters. The Treshnish Isles and other small islands and mainland coasts with views towards the development area share this position. Collectively, these unassessed effects on communities closely connected to the seascape indicate that the applicant's assessment lacks comprehensiveness and fails to capture the full scope of potential socio-economic and visual impacts.

The applicant's environmental impact assessment applies a distance-based methodology that systematically moderates and discounts effects on sensitive receptors located beyond approximately 20 kilometres from the development site. This approach effectively reduces the assessed magnitude of change and diminishes the perceived significance of impacts at these greater distances. When compared to standard mitigation practices, which require thorough and place-specific evaluations regardless of distance, the applicant's methodology falls short by not adequately capturing or addressing the full extent of environmental consequences experienced by distant communities.

Taken together, the evidence demonstrates a clear and concerning pattern: wherever a highly sensitive receptor lies beyond the 20-kilometre threshold, the assessment attenuates the magnitude of impact without conducting a detailed, place-based analysis. Consequently, the communities residing in these areas receive no specific assessment of the effects they endure, undermining the integrity and comprehensiveness of the environmental impact assessment. This systematic discounting of significant effects beyond 20 kilometres fails to meet the necessary standards for a robust and equitable evaluation of environmental impacts.

1.1.82 Personal Observations

In addition to the planning matters above, I am personally concerned because: My in-laws have been part of the community on Iona for many decades. Although I don't live in the island, I visit every year. The island is such a unique oasis of tranquility and its economy is driven by that promise of peacefulness and escape from the industrial world. It would be a tragedy to spoil the unspoilt skyline with wind turbines and it would have untold effects on the economy and the happiness of both islanders and visitors.

Based on my own local knowledge, I also wish to highlight that: The panorama, birdlife

Finally, I would also ask the Scottish Ministers to consider: Ensure that local views are fully heard

1.1.83 Further Comments

It is so clear that spoiling the Iona coastline would be such a tragedy for all involved - it makes absolutely no sense whatsoever.

1.1.84 Summary

The proposal for the MachairWind Offshore Wind Farm has not been substantiated with sufficient evidence to satisfy the relevant statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges considerable impacts on landscapes designated at the national level, as well as on the cultural heritage and communities along this coastal region. However, published analyses of the applicant's documentation reveal that these impacts have been significantly underestimated, and crucially, the mandatory heritage assessment has not been completed. Furthermore, while the effects on the island communities involved were identified, they have not been subject to any formal assessment. The ecological criteria required by legislation remain unproven as achievable, and it should be noted that only a portion of the overall project has been submitted for consideration by the Scottish Ministers.

In light of these deficiencies, it is respectfully submitted that the Scottish Ministers should refuse consent for the MachairWind Offshore Wind Farm proposal, as well as decline the associated marine licence application.

Should the Ministers consider an alternative course and not refuse consent outright, it is requested that they require the submission of additional environmental information and enhanced visual representations. The determination of the applications should be deferred until after a public inquiry is conducted, allowing for a comprehensive examination of the issues raised in this objection. Regardless of the final decision, it is further requested that the Ministers explicitly address and set out their conclusions regarding the impacts on cultural heritage and on the affected island communities in their stated reasons.

Yours faithfully,

[Redacted]

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

Member of the public 510
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, as detailed in applications 00012385 and 00012386. These applications, lodged by MachairWind Limited (ScottishPower Renewables), seek approval under section 36 of the Electricity Act 1989 and a marine licence under Part 4 of the Marine (Scotland) Act 2010. I request that this correspondence be recorded as an official objection, that I am registered accordingly, and that I receive notification of the final determination regarding these applications.

The proposals involve the construction of an offshore wind farm with a generating capacity of approximately 2 gigawatts. This development would consist of between 91 and 144 turbines, each reaching up to 335 metres to blade tip. The site covers around 448 square kilometres of marine area situated north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in proximity to the islands and coastal communities of the southern Hebrides.

My objection is grounded in both planning and environmental considerations, evaluated within the statutory and policy frameworks applicable to these applications. It is important to emphasise that the onus lies entirely with the applicant to provide compelling, sufficient evidence to meet the relevant statutory tests. Objectors are not obliged to demonstrate the contrary. In this instance, the applicant has failed to discharge that burden. Consequently, for the reasons elaborated below, I submit that consent should be refused.

1.1.85 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to comply with the impact criteria set out in NPF4 Policy 11, thereby undermining the policy's intended support for renewable energy development. While Policy 11 endorses such development, this endorsement is contingent upon meeting specific impact tests, including those concerning communities, landscapes, seascapes, and other receptors as outlined in Policy 11(c), (d), and (e). The proposal would result in significant adverse effects on nationally designated landscapes and seascapes, which are protected under the policy. Furthermore, there is no satisfactory demonstration that the cultural significance of scheduled monuments and their settings would be preserved, nor that island communities would be adequately safeguarded. Additionally, the evidence submitted does not establish that the required ecological tests can be met. Taken together, these deficiencies indicate a clear conflict with the impact criteria of NPF4 Policy 11, and therefore the proposal cannot be considered compliant or supported under this policy.

The proposal fails to comply with multiple NPF4 policies designed to protect nationally important landscapes, heritage assets, and biodiversity, resulting in significant adverse effects on these designated assets. Policy 11 operates alongside Policies 4(c) and 4(d), which safeguard National Scenic Areas and nationally important landscapes from significant adverse impacts on their defining qualities. Furthermore, Policy 7, including 7(h) concerning scheduled monuments and 7(c) and 7(d) regarding the setting of historic assets, requires protection of cultural

significance. Policy 3 addresses biodiversity conservation. The evidence demonstrates that the proposal would cause considerable harm to nationally designated landscapes and seascapes, fails to show that the cultural significance and settings of scheduled monuments would be preserved, does not adequately safeguard island communities, and does not satisfy the necessary ecological tests based on the submitted information. Consequently, the proposal is in clear conflict with these relevant NPF4 policies.

The applicant's evidence confirms that the proposal would have adverse effects on the landscape, heritage, and community interests safeguarded by the terrestrial development plan, including the Argyll and Bute Local Development Plan 2. These impacts are material to the land-based effects under consideration and directly conflict with the policies set out within that plan.

Consequently, the proposal is inconsistent with the overall development plan framework and with National Planning Framework 4 when considered in its entirety. The applicant has failed to demonstrate that these conflicts can be overcome, thereby reinforcing the conclusion that the proposal does not accord with the relevant planning policies.

1.1.86 Seascape, Landscape and Visual Effects

The practical consequence of the applicant's assessment methodology is that it systematically underestimates the magnitude of landscape and visual effects at distances where the most sensitive designated landscapes are located. Despite the absence of any explicit distance threshold in the applicant's Appendix 16.1 beyond which major effects cease, the evidence demonstrates a consistent pattern across all three streams of assessment: no highly sensitive receptor beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of its inherent sensitivity or the extent of visibility. This pattern indicates an implicit distance-based moderation that is not transparently acknowledged in the methodology.

The applicant's own documentation further confirms the influence of distance in shaping judgements of effect magnitude. For example, an assessment of a coastal area over 30 kilometres away qualifies the scale of change as small, explicitly citing the viewing distance as a key factor. Similarly, the Landscape Character synthesis categorises magnitude as High within approximately 20 kilometres, Medium between roughly 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. These distance thresholds, while not formally stated in the methodology, effectively constrain the recognition of significant effects at greater distances, where important landscape receptors are situated.

As a result, the protective tests applied in the assessment process are based on understated inputs. By moderating magnitude values at distances coinciding with the location of the most sensitive designated landscapes, the conclusions drawn cannot be regarded as a reliable or accurate reflection of the true effects the Scottish Ministers are being asked to consider. This calls into question the robustness of the applicant's methodology and the validity of its predicted outcomes, undermining confidence in the decision-making process.

The practical consequence of relying on the submitted visualisation materials is that they do not fully convey the true scale and impact of the proposed development as experienced on site. NatureScot's visualisation guidance, which the applicant follows, explicitly recognises that printed visualisations cannot replicate the scale perceived by a viewer in the field. Furthermore, the wireline drawings included within the same panoramic views share the inherent limitations of the photographs they accompany; these drawings are technical renderings within the visualisation rather than independent tools to correct or enhance the visual accuracy. Therefore, while the materials offer a useful indication of appearance, they should be treated with caution and not be regarded as definitive representations of visual impact.

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

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

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

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

1.1.87 Cultural Landscape, Archaeology and Historic Environment

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

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

The applicant's own baseline assessment acknowledges that the cultural significance of the affected heritage assets is deeply rooted in a range of experiential and landscape qualities. These include aspects such as pilgrimage, arrival by sea, and movement through a living cultural landscape, as well as the interrelationships between monuments, spirituality, and their surrounding landscape and seascape. Importantly, these qualities are experienced dynamically through movement rather than from fixed viewpoints. Despite this recognition, Historic Environment Scotland's consultation responses, as recorded within the application, have highlighted the need for additional viewpoints to ensure these broader experiential and cultural qualities are adequately represented. This suggests that the current assessment may not fully capture the holistic nature of the cultural landscape and its intangible attributes. Therefore, it is essential that the assessment methodology be expanded to incorporate these wider perspectives, to provide a more comprehensive understanding of heritage impacts in line with the applicant's own baseline findings and statutory consultees' advice.

The heritage impact conclusions presented rely heavily on the landscape assessment as their foundation. However, where the landscape effects have been understated, as identified previously, the subsequent heritage conclusions inevitably reflect that same understatement. This dependency calls into question the robustness of the heritage impact findings.

In essence, the credibility of the heritage assessment is compromised by the deficiencies in the landscape evaluation. Without an accurate and comprehensive appraisal of landscape effects, the heritage conclusions derived are not sufficiently reliable to inform decision-making. Therefore, the current heritage impact conclusions should be treated with caution given their reliance on a flawed landscape assessment.

While mitigation measures are referenced in the application, they fall short when compared against the requirements of NPF4 Policy 7(h) concerning scheduled monuments, alongside Policies 7(c) and 7(d) addressing the setting of heritage assets, as well as GEN 6 and the guidance set out in paragraphs 4.22 to 4.23 of the National Marine Plan. Crucially, the applicant has not provided the necessary assessment demonstrating that the cultural significance of internationally and nationally important heritage assets and their settings will be preserved. Consequently, the Scottish Ministers lack the comprehensive evidence needed to conclude that these heritage assets would be adequately protected. This shortfall undermines the application's compliance with key policy obligations and casts doubt on its acceptability in terms of heritage conservation.

1.1.88 Effects on Island Communities, Tourism and the Local Economy

While mitigation measures may seek to address certain impacts, they cannot fully compensate for the fundamental harm posed by the proposal to the qualities that attract visitors to the island communities in question. The applicant's own baseline assessments identify key attributes such as landscape, seascape, cultural heritage, tranquillity and remoteness as the primary reasons visitors are drawn to these areas. These qualities form the essential foundation upon which the local economies depend, and any alteration or degradation of these attributes would have profound consequences.

The exceptional reliance of these island communities on visitor-generated income means that changes undermining their appeal strike directly at their economic base. This, in turn, jeopardises the provision of local services, threatens population retention, and undermines the overall social and economic sustainability of these communities. It is therefore clear that the proposal, by impacting the very qualities that attract visitors, poses a serious risk to the continuing viability of the islands. Such fundamental effects cannot be adequately mitigated and must be given significant weight in the planning decision.

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

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

The applicant acknowledges that island communities require particular scrutiny in the planning process but has failed to undertake the necessary assessment to understand the proposal's effects on these communities. Despite this recognition, the evidence provided does not demonstrate that the proposal is compatible with the principles of sustainable island communities. Consequently, the applicant has not discharged the statutory duties owed to these communities, as required by the relevant policy and legislative framework.

This omission directly conflicts with the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions be based on sound socio-economic evidence and adopt a precautionary approach where such evidence is lacking. Furthermore, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 require that the interests of island communities be assessed and given appropriate weight through meaningful engagement from the inception to the conclusion of any proposal. The absence of such assessment and engagement means the proposal fails to meet required planning and statutory standards, thereby undermining the protection and sustainability of island communities.

1.1.89 Ecology, Biodiversity and Habitats Regulations

There is considerable uncertainty regarding the environmental impact of the proposed development due to the presence of Priority Marine Features and Annex I habitats within the development area itself. Additionally, the surrounding waters support important species including seabirds, marine mammals, and basking sharks. Introducing large-scale construction, operation, and decommissioning activities into this ecologically sensitive environment over several decades raises significant concerns about potential adverse effects. Given the ecological importance of the site and the scale and duration of the proposed activities, the risk of substantial environmental harm cannot be discounted at this stage.

The applicant’s submissions fail to demonstrate compliance with the statutory tests designed to protect internationally important habitats and species. Despite the inclusion of derogation documents intended to support the case, these materials reveal an insufficient degree of certainty that the necessary legal safeguards can be met. This absence of clarity undermines the fundamental requirements imposed by relevant environmental legislation, which demand rigorous proof that adverse effects on protected ecological features will be avoided or adequately mitigated.

Given this evidential shortfall, the application cannot be regarded as satisfying the statutory criteria for consent. The failure to establish that the prescribed tests have been met calls into question the legitimacy of any grant of permission. In light of the above, the case for allowing the proposed development is significantly weakened, and refusal is warranted to ensure the protection of internationally important ecological assets.

1.1.90 Cumulative and In-Combination Effects

The current assessment approach results in a fragmented evaluation of the project, with only a portion before the Scottish Ministers while critical components such as the export cable corridor and onshore transmission works are deferred to later applications. This means that the project cannot be operated as intended without these elements, yet their impacts are excluded from the initial decision-making process. Consequently, the practical effect is that the full range of environmental and operational consequences is never considered in a single, comprehensive assessment.

This piecemeal approach directly contravenes established legal principles, notably those affirmed by the courts in the Raeshaw Farms case. The courts have

emphasised that a project must be assessed in its entirety rather than being divided into smaller parts, each of which may appear to have less significant effects when considered in isolation. By deferring important elements to subsequent consenting processes, the present method risks underestimating the cumulative impacts and undermines the integrity of the overall evaluation.

Therefore, it is imperative that the planning process requires a holistic assessment of all components essential to the operation of the wind farm before any determination is made. Assessing the project as a whole ensures compliance with legal precedents and enables a robust, transparent, and informed decision. Without this comprehensive approach, the current assessment framework remains fundamentally flawed and fails to provide adequate scrutiny of the development's full implications.

The cumulative impact assessment presented in the Environmental Impact Assessment relies heavily on the findings of the individual landscape, heritage, and socio-economic assessments. As these foundational assessments have been demonstrated to understate the magnitude of effects, the cumulative assessment consequently adopts this diminished baseline. This approach inherently compromises the reliability of the cumulative impact conclusions.

When the baseline against which cumulative effects are measured is reduced, the combined effects of the proposal alongside other existing, consented, and foreseeable developments are similarly underestimated. This means that the cumulative assessment does not fully capture the true extent of potential harm or change that may arise from the collective development activity within the area. The resulting analysis thus provides an incomplete and potentially misleading picture of the overall environmental and social impacts.

Given that the cumulative assessment is predicated on these flawed baseline assessments, there is a clear risk that decision-makers and stakeholders are not presented with a sufficiently robust understanding of the combined implications. It is therefore essential that the baseline assessments are revisited and accurately reflect the actual conditions to ensure that cumulative effects are properly evaluated and appropriately addressed within the planning process.

The applicant's approach to mitigating environmental impacts is insufficient when compared against the requirements set out in GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the EIA Regulations concerning project splitting. Specifically, there has been a failure to reliably identify and assess the cumulative and in-combination effects of the proposal, including the overall effects of the project as a whole. This omission undermines compliance with both planning policies and environmental regulations. It is therefore essential that the decision-making process explicitly addresses the treatment of deferred works to ensure a comprehensive evaluation of all potential impacts.

1.1.91 Public Engagement, Site Selection and Environmental Information

The consultation process associated with the site-selection and planning application stages has demonstrably failed to meet the requisite standards for effective public participation. The applicant requests that Scottish Ministers attribute significant

weight to the site-selection process; however, the deficiencies in public involvement at both the plan and site-selection phases have persisted into the application stage. Notably, the application documentation comprises many thousands of pages of technical material, presenting a substantial challenge for meaningful engagement. Moreover, the consultation period coincided with the busiest months for island communities, a time when residents are continuously occupied with the visitor season and access to specialist advice is at its lowest. This timing disparity is particularly significant given that the applicant has had years, along with substantial professional and financial resources, to prepare its case, contrasting sharply with the limited capacity of affected communities to respond effectively.

National Marine Plan policy GEN 18, alongside the principles of effective public participation enshrined in the Aarhus Convention, explicitly require that those affected by decisions of this magnitude have a realistic and fair opportunity to engage. The conditions under which the local communities were expected to participate have fallen short of this standard, undermining the legitimacy and robustness of the consultation process. It is therefore essential that Ministers give careful and critical consideration to these shortcomings when evaluating the representations submitted, recognising that inadequate public participation has materially impacted the legitimacy of the site-selection and application processes.

The Environmental Impact Assessment submitted with this application is fundamentally insufficient to enable the Scottish Ministers to make an informed decision. While the assessment is extensive in scope, it falls short in critical respects across multiple topics. It identifies potential pathways to significant environmental effects but fails to investigate these adequately or applies methodologies that do not substantiate its conclusions. For example, the landscape assessment relies on distance patterns not supported by its own methodology; the heritage assessment omits demonstrating the application of its stated integrity test; and the socio-economic assessment lacks any place-based analysis relevant to the affected islands.

Moreover, the application improperly depends on future assessments, post-consent plans, monitoring regimes, and further approvals to address outstanding environmental concerns. Such reliance is inconsistent with the requirements of the Environmental Impact Assessment Regulations, which mandate that likely significant effects be fully understood prior to determination. The prospect of resolving these issues after consent is granted does not satisfy the need for comprehensive evidence at the decision-making stage.

In conclusion, the Scottish Ministers must make their determination based on the evidence currently before them. The applicant has not demonstrated that the environmental information provided meets this essential standard. Accordingly, the application should be refused on the basis that the Environmental Impact Assessment is inadequate to support a properly informed decision.

1.1.92 Effects on Local Area

The applicant’s assessment significantly underestimates the direct and substantial effects of the proposed development on the communities, economy, and heritage of

Islay, Colonsay, and Oronsay, thereby undermining the reliability of the environmental and heritage impact evaluation. Although Islay and Colonsay are the closest islands to the development area, which lies immediately north-west of Islay and west of Colonsay, the application primarily considers Islay only as a potential project location. It fails to evaluate Islay as an affected island community in its own right, neglecting a place-based assessment of the impacts on its Atlantic-facing communities, which directly face the nearest edge of the 448 square kilometre development area. This omission disregards potential effects on the islands' setting, economy, and community life.

For Colonsay and Oronsay, the seaward outlook—integral to daily life—faces the development array directly. Notably, the North Colonsay and Western Cliffs Special Protection Area, which forms part of Colonsay's coastline, is central to the applicant's derogation case and compensation plan. This area is the clearest acknowledgment within the application that harm to the internationally protected seabird population of these cliffs cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance situated within this community's area, is subject to the same deficiencies identified in the heritage assessment, particularly concerning the treatment of its open maritime setting. Taken together, these points demonstrate that the applicant's evaluation lacks the necessary rigour and comprehensiveness to fully capture the scale and nature of effects on these vulnerable island communities and their heritage assets.

The applicant's assessment significantly underestimates the scale and impact of the proposed development on the community and environment of Iona, leading to an incomplete and inaccurate evaluation of its effects. This shortfall has practical consequences for the island's residents and visitors, as the assessment fails to fully address the potential loss of habitability identified by the applicant's own consultants. A household consultation revealed that 92 per cent of respondents on Iona object to the proposal, yet despite this clear community concern, the pathway of potential effect on habitability remains unassessed.

The visual and heritage impacts are particularly significant given Iona's unique and highly sensitive landscape. The Coastal Character assessment attributes a high sensitivity to the Sound of Iona, noting its direct orientation towards the development area, extensive visibility, and a large geographical extent of change. The turbines would be visible across approximately 39 degrees of the horizon from a distance of about 21 kilometres, affecting views from key locations such as the ferry crossing between Fionnphort and Iona. The west coast of Iona is similarly assessed as highly sensitive, with widespread visibility and accepted significant effects for residents and visitors throughout much of the island, including from Dùn Ì, its highest point.

Moreover, Iona's monastic landscape, which includes internationally important heritage assets such as the Abbey, the Nunnery, and the high crosses, is intrinsically linked to pilgrimage, arrival by sea, and movement through the landscape. Historic Environment Scotland requested additional visualisations from critical viewpoints, including the ferry crossing itself, yet crucial views from raised ground above St Columba's Bay at Càrn Cùl ri Èirinn remain unprovided. To illustrate the scale of the impact, the largest turbines would overtop Ben Hynish on Tiree—an established landmark visible from Iona at 33 kilometres—by approximately 194 metres, despite

being located at roughly two-thirds of that distance. Taken together, these factors demonstrate that the applicant's assessment does not adequately capture the magnitude or significance of the development's effects on Iona's visual environment, community wellbeing, or heritage value.

The applicant's assessment of the effects on Mull and the Ross of Mull coastal communities and landscapes includes some acknowledgement of significant impacts; however, it falls short in fully addressing the scale and nature of these effects, particularly when compared to proposed mitigation measures. For example, while the assessment recognises significant effects at Erraid and on the Core Paths of the Ross, and concedes that Fionnphort—a vital gateway community for visitors to Iona—would experience notable impact, the overall attribution of magnitude remains moderate. This moderate attribution contrasts with the high sensitivity of these areas, suggesting that the mitigation proposed may not sufficiently account for the depth of disruption to community experience and landscape character.

Across the wider extent of Mull, a similar pattern emerges. The applicant accepts significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is assessed as having high sensitivity throughout, with viewing distances ranging from 21 to 33 kilometres. Yet, the magnitude of impact is consistently rated no higher than medium. This discrepancy underlines a methodological approach reliant on distance to downplay the potential visual and experiential impacts. For instance, in the Wilderness and Gribun Rocks coastal area, the assessment dismisses the scale of change as small due solely to viewing distances exceeding 30 kilometres, a reasoning that appears insufficient to capture the character and quality of the seascape valued by communities and visitors alike.

Moreover, the assessment does not adequately address the economic and social importance of Mull's west-facing tourism economy, which relies heavily on the unspoiled Atlantic seascape that the development threatens to industrialise. Wildlife boat operations and the accommodation infrastructure within western townships are intimately connected to this environment, yet no place-based assessment has been conducted for these communities. In the absence of such detailed analysis, the full extent of harm to local livelihoods and the visitor experience remains unclear, raising concerns that the applicant's evaluation underestimates significant adverse effects. Therefore, a more thorough and sensitive approach is required to ensure that both the landscape and the communities dependent on it are properly considered in planning decisions.

While the applicant's assessment acknowledges some effects on designated landscapes, its conclusions underestimate significant impacts on key seaboard National Scenic Areas and vulnerable island communities, failing to provide adequate mitigation. Notably, Ulva, situated within the Loch na Keal National Scenic Area, is a community-owned island undergoing regeneration. This small, re-establishing community relies heavily on the unspoilt seascape and setting—qualities directly threatened by the development—yet the applicant has made no specific assessment of effects on Ulva's natural or cultural environment. Similarly, Staffa, also within the Loch na Keal National Scenic Area and located approximately 35 kilometres from the development site, lies beyond the 30-kilometre assessment

boundary recommended by NatureScot. Despite the applicant's own recognition of Staffa's panoramic maritime qualities, it concludes that the scale of change there would be small and not significant, a position that fails to fully account for the island's celebrated status and sensitivity. The Jura National Scenic Area, assessed as having High sensitivity between 28 and 32 kilometres distance, is attributed only Medium to Low magnitude of impact, with this moderation justified by distance and retained landforms. However, this approach neglects that the designation rests on Jura's wild, undeveloped Atlantic outlook, which is inherently vulnerable to change. A similar treatment is applied to the Scarba, Lunga and the Garvellachs National Scenic Area, located some 35 to 40 kilometres away, where effects are also minimized. Taken together, these assessments omit or understate significant effects on the natural and cultural qualities of important designated landscapes and island communities, thereby undermining the level of protection necessary for their regeneration and conservation.

The applicant's assessment concludes that the South Tiree coastal area, situated approximately 35 kilometres from the proposed development, exhibits a High sensitivity yet is attributed only a Low magnitude of change. This evaluation leads to a practical consequence whereby the impact upon Tiree's landscape character is materially underestimated, compromising the reliability of the overall effects assessment. The designation of Low magnitude fails to reflect the scale and prominence of the development as perceived from this sensitive receptor.

Tiree is an exceptionally low-lying island characterised by an open oceanic horizon and a landscape defined primarily by the dominance of sea and sky. Its highest elevation, Ben Hynish, rises to merely 141 metres, which emphasises the island's distinctive flat and expansive character. The introduction of turbines reaching up to 335 metres in height would constitute vertical elements of unprecedented scale within this seascape. Such structures would significantly alter the visual and experiential qualities that define Tiree's landscape, yet the assessment's Low magnitude rating does not adequately acknowledge this fundamental alteration.

In light of these considerations, the applicant's evaluation significantly understates the magnitude of change and its impact on Tiree's sensitive and distinctive landscape character. This understatement results in an unreliable appraisal of effects that fails to properly inform decision-making regarding the acceptability of the development's landscape and visual impacts. Accordingly, the assessment should be revisited to ensure a more accurate and proportionate recognition of the effects upon Tiree's unique seascape.

The applicant's distance-based methodology systematically moderates and discounts environmental effects on sensitive receptors located beyond approximately 20 kilometres, resulting in an underestimation of impacts that compromises the environmental impact assessment's integrity. Specifically, the assessment reduces the magnitude of change attributed to highly sensitive receptors at these distances, effectively diminishing the perceived severity of effects. This approach overlooks the lived experiences of communities situated beyond the 20-kilometre threshold, as no place-based assessment has been conducted to capture the specific local impacts they endure. Consequently, the current evaluation fails to provide a comprehensive

understanding of the environmental consequences, thereby undermining the robustness and credibility of the overall assessment.

1.1.93 Personal Observations

Finally, I would also ask the Scottish Ministers to consider: Listen to the views of the people that live and work in these areas and take their concerns seriously

1.1.94 Summary

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

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

Yours faithfully,

[Redacted]

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

Member of the public 511
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, corresponding to application number 00012385 for consent under section 36 of the Electricity Act 1989, and application number 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications, lodged by MachairWind Limited (ScottishPower Renewables), seek approval for a substantial offshore wind energy development. I request that my objection be formally recorded and that I receive notification of the final decisions concerning these applications.

The project under consideration involves the construction of an offshore wind farm with an installed capacity of approximately 2 gigawatts. It envisages the erection of between 91 and 144 turbines, each reaching up to 335 metres in blade tip height. This development is proposed within a designated Windfarm Development Area spanning around 448 square kilometres of marine environment situated to the north-west of Islay and west of Colonsay. The site lies approximately 21 kilometres from Iona and is in proximity to various islands and coastal communities within the southern Hebrides.

My objection is grounded upon planning and environmental considerations, which will be explicated below with reference to the statutory and policy frameworks applicable to these applications. It is incumbent upon the applicant to provide adequate and persuasive evidence demonstrating that all relevant statutory tests and policy criteria are satisfied. The onus does not lie with objectors to disprove the proposal. In this instance, I contend that the applicant has failed to discharge this burden effectively. Consequently, I maintain that the applications should be refused consent.

1.1.95 Conflict with National Planning Framework 4 and the Development Plan

NPF4 Policy 11 endorses renewable energy development; however, such support is conditional upon compliance with the policy's impact criteria. Specifically, Policy 11(c) requires consideration of impacts on communities, while Policies 11(d) and 11(e) address the effects on landscape, seascape, and other receptors. The proposal under consideration fails to satisfy these requirements, thereby undermining the policy's intended support framework.

As detailed in subsequent analyses, the proposal would result in significant adverse effects on nationally designated landscapes and seascapes. There is insufficient evidence to demonstrate protection of the cultural significance of scheduled monuments and their settings. Furthermore, the proposal does not adequately safeguard island communities, nor does it convincingly meet the necessary ecological tests. Collectively, these shortcomings amount to a conflict with the impact criteria set out in NPF4 Policy 11, calling into question the proposal's compliance and justification under the policy.

The practical consequence of the proposal is that it would result in significant adverse effects on multiple nationally important designated assets, undermining key protections established by the National Planning Framework 4 (NPF4). Specifically,

the proposal fails to comply with Policy 11 and related provisions such as Policy 4(c) and 4(d), which safeguard National Scenic Areas and other nationally important landscapes by preventing significant harm to the qualities that justify their designation. Moreover, it conflicts with Policy 7, including Policy 7(h) concerning scheduled monuments and Policies 7(c) and 7(d) regarding the settings of historic assets. The evidence clearly indicates that these cultural heritage considerations have not been adequately addressed to demonstrate protection or appropriate mitigation.

In addition, the proposal does not meet the requirements of Policy 3 relating to biodiversity. The submitted evidence falls short of demonstrating that the ecological tests, which are fundamental for safeguarding biodiversity, can be satisfied. It also fails to show that island communities, which may be particularly vulnerable, would be adequately safeguarded in accordance with the framework. Taken together, these shortcomings indicate that the proposal conflicts with multiple NPF4 policies designed to protect nationally designated landscapes, heritage assets, and biodiversity, and therefore cannot be supported without significant revision and further evidence.

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

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

In conclusion, the proposal is fundamentally at odds with the established terrestrial development plan policies and the overarching national framework. This conflict undermines the rationale for granting consent and strongly supports refusal. The adverse effects on landscape, heritage, and community interests weigh decisively against the proposal, and it should therefore be rejected in accordance with the statutory development plan and national planning policy.

1.1.96 Seascape, Landscape and Visual Effects

The applicant's assessment methodology, as set out in Appendix 16.1, notably lacks a defined distance threshold beyond which major effects are considered to cease. Nevertheless, a comprehensive review of the applicant's Chapter 16 and Appendices 16.1 to 16.3, as presented in a published Evidence Note supporting community objections, reveals a consistent pattern: no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of its sensitivity or the extent of

visibility. This observation is corroborated by the applicant's own documentation, which acknowledges the influence of distance in the evaluation of effects. For example, an assessment of a coastal area over 30 kilometres away explicitly states that, given the viewing distance, the scale of change is judged to be small. Furthermore, the Landscape Character synthesis categorises magnitude as High within roughly 20 kilometres, Medium between approximately 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types.

This systematic moderation of magnitude at distances coinciding with the locations of the most sensitive designated landscapes raises significant concerns regarding the reliability of the conclusions drawn. By effectively applying protective tests to understated inputs, the assessment underrepresents the true scale of effects at critical distances. Consequently, the outcomes do not provide a dependable description of the impacts that the Scottish Ministers are being requested to consent to. It is therefore imperative that the assessment methodology be scrutinised and revised to accurately reflect the magnitude of change at all relevant distances, ensuring that the decision-making process is fully informed.

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

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

The proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration of the night-time seascape character for the entire 35-year operational period. This change would be immediately perceptible and enduring, fundamentally transforming the visual experience of the seascape after dark.

Beyond the operational lifespan, the harm caused to the seascape character cannot be dismissed, as consenting to this development effectively designates the area as suitable for wind farm use. Such a decision carries lasting policy implications by establishing a precedent that the existing unlit seascape is appropriate for industrial-scale lighting and associated visual impacts.

Consequently, the introduction of permanent lighting must be carefully weighed within the planning framework, considering not only the immediate and ongoing effects on night-time seascape character but also the broader message such consent would send about the acceptability of this landscape for wind energy development. The decision should reflect a clear understanding of these implications before authorising the proposal.

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

1.1.97 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of heritage impacts, while adopting Historic Environment Scotland's recognised methodology, falls short in its application and undermines confidence in its conclusions. The methodology requires a clear evaluative process to determine whether changes to the setting affect the contribution that setting makes to the cultural significance of historic assets, and whether the integrity of that setting is adequately retained. Crucially, it distinguishes between mere visual change and actual adverse impact, avoiding a direct equation of visibility with harm. This nuanced approach is designed to ensure that assessments reflect the true significance of setting rather than superficial or solely visual considerations.

However, the operational assessment provided by the applicant, as examined in a published Methodological Audit, does not demonstrate that this evaluative step has been properly undertaken. The assessment focuses extensively on describing visual changes—such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—but fails to show how these observations translate into an evaluation of the integrity of setting in accordance with the methodology. The Audit notes that although the applicant concludes the integrity of setting is adequately retained, this conclusion is not supported by a transparent or systematic assessment process. Without this critical evaluative stage, the reliability of the assessment's findings on heritage impacts is fundamentally compromised.

The practical consequence of the applicant's approach is that the assessment may underrepresent key aspects of the cultural significance of the heritage assets in question. The applicant's own baseline acknowledges that this significance arises not merely from static features but from dynamic qualities such as pilgrimage routes, arrival by sea, movement through an active cultural landscape, and the interrelationships among monuments, spirituality, and the encompassing landscape and seascape. These elements are experienced through movement rather than from fixed viewpoints, indicating a broader and more immersive cultural context that should be central to any impact evaluation.

Furthermore, Historic Environment Scotland's consultation responses, as recorded within the application, highlight this deficiency by requesting additional viewpoints to ensure these wider experiential qualities are properly represented. This suggests that the current assessment falls short of capturing the full scope of the heritage

assets' cultural landscape. Without addressing these concerns, the appraisal risks providing an incomplete understanding of the heritage impacts, potentially leading to mitigation measures that do not fully respect or preserve the assets' cultural significance. It is therefore necessary to incorporate these broader landscape and experiential factors into the assessment to achieve a more comprehensive and accurate evaluation.

The practical consequence of the deficiencies identified in the landscape assessment is that the conclusions drawn regarding heritage impacts cannot be regarded as fully reliable. The heritage conclusions are explicitly dependent upon the findings of the landscape assessment; therefore, any understatement of landscape effects directly affects the accuracy of the heritage impact appraisal. This interdependency means that flaws in the landscape evaluation inevitably lead to a corresponding understatement in the heritage analysis.

It is clear that where landscape effects have been understated, as previously demonstrated, the heritage conclusions that rely upon those assessments inherit the same understatement. This creates a chain of understated impacts, whereby the significance of harm to heritage assets may be minimized or overlooked altogether. The reliance on an incomplete or insufficiently rigorous landscape assessment undermines the credibility of the overall heritage impact conclusions presented.

In light of this, it is essential that the landscape assessment is robust and comprehensive, as it forms a critical foundation for understanding the full extent of heritage impacts. Without rectifying these shortcomings, the heritage conclusions remain questionable and cannot be confidently used to inform planning decisions. Therefore, the current heritage impact assessment should be reconsidered with a properly conducted landscape appraisal to ensure that all effects are accurately captured and reported.

The application fails to comply with essential policy requirements for the protection of heritage assets, rendering it unacceptable in its current form. Specifically, it engages National Planning Framework 4 (NPF4) Policy 7(h), which pertains to scheduled monuments, as well as Policies 7(c) and 7(d) concerning their settings, alongside GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Despite these clear policy obligations, the applicant has not demonstrated that the cultural significance of internationally and nationally important heritage assets and their settings will be safeguarded. Furthermore, the Scottish Ministers have not been provided with the necessary assessments to substantiate such a conclusion. In the absence of this critical evidence, the proposal cannot be deemed compliant with heritage protection policies and should therefore be refused.

1.1.98 Effects on Island Communities, Tourism and the Local Economy

There is significant uncertainty regarding the proposal's impact on the island communities, which rely disproportionately on visitors drawn by specific qualities identified in the applicant's own baseline assessments. These qualities—landscape, seascape, cultural heritage, tranquillity, and remoteness—constitute the very foundation of the local economy. Any alteration to these attributes would not only undermine the economic base but also jeopardise essential services, resident

populations, and the long-term viability of these communities. Consequently, the proposal poses a fundamental threat to the sustainability of the island settlements.

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

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

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

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

1.1.99 Ecology, Biodiversity and Habitats Regulations

The mitigation measures proposed for this development are insufficient when weighed against the ecological sensitivity of the site and surrounding waters. Priority Marine Features and Annex I habitats are present within the development area itself, indicating a high level of ecological importance. Furthermore, the surrounding waters serve as habitat for seabirds, marine mammals, and basking sharks, all of which are species of conservation concern. Introducing large-scale construction, operational, and decommissioning activities over several decades would inevitably cause significant adverse environmental effects. The scale and duration of the disturbance pose substantial risks to these protected species and habitats, and the proposed

mitigation does not adequately address the long-term impacts on this sensitive marine environment. Given the presence of these Priority Marine Features and protected species, the development's ecological consequences must be more thoroughly accounted for and mitigated before proceeding.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan, specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents represent recognised mechanisms intended to address potential adverse impacts on protected sites when it cannot be conclusively ruled out that the proposal would maintain site integrity. Their inclusion signals the applicant's awareness of possible significant effects and a preparedness to implement measures in line with derogation provisions.

It is important to understand that such submissions are typically prepared for situations where adverse effects on the integrity of a protected site are uncertain or likely. The presence of these documents within the application is a critical feature, as it highlights that the applicant does not categorically exclude the possibility of harm. This is a prudent step intended to facilitate regulatory consideration and possible mitigation, reflecting an approach that accounts for ecological sensitivities and the need for compensatory action.

Nevertheless, the applicant acknowledges that Scottish Ministers may arrive at a different conclusion regarding adverse effects than the applicant's own assessment. This recognition underscores that the submitted derogation and compensation documents serve as precautionary and responsive measures rather than definitive proof of no impact. In this context, the documents form a necessary part of the application's overall environmental evaluation, contributing to informed decision-making about the proposal's acceptability and the adequacy of proposed mitigation.

The applicant's evidence establishes that, under the Habitats Regulations, development consent may only be granted where the competent authority has ascertained beyond reasonable scientific doubt that the proposal will not adversely affect the integrity of the protected site, unless the strict derogation tests are satisfied. This places a high evidential burden on the applicant to demonstrate the absence of adverse effects; mitigation, compensation measures, and future monitoring alone cannot satisfy the statutory requirements. This legal framework is supported by the provisions of GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of NPF4. Taken together, these policies and regulations emphasize a stringent and precautionary approach to development affecting protected habitats and species. Consequently, any consent must be based on robust, conclusive scientific evidence meeting this exacting standard.

The applicant has not demonstrated that the statutory tests required to protect internationally important habitats and species can be satisfied. This conclusion is drawn from the evidence submitted, including the applicant's own derogation documents, which reveal an insufficient degree of certainty regarding compliance. Without clear assurance that these legal protections are upheld, the application fails to meet the necessary statutory criteria, thereby undermining the justification for granting consent.

1.1.100 Cumulative and In-Combination Effects

The current application before the Scottish Ministers addresses only a portion of the overall project, notably excluding the export cable corridor and the onshore transmission works, which are essential components without which the wind farm cannot function. Consequently, the environmental and planning effects of the entire development are not assessed collectively; instead, these significant elements are reserved for consideration under separate, subsequent consenting processes following the principal decision. This segmentation results in an incomplete evaluation of the project's full impact at the decision-making stage.

Such an approach conflicts with established legal principles, as emphasised in the Raeshaw Farms case, where the courts affirmed that a project must be appraised in its entirety rather than being fragmented into smaller parts whose individual effects may appear diminished. By deferring key components to later applications, the current assessment method effectively undermines comprehensive scrutiny, compromising the integrity and completeness of the planning process. This procedural flaw renders the present evaluation legally and procedurally unsound.

The practical consequence of relying on the current cumulative impact assessment is that it fails to provide an accurate picture of the combined effects of the proposal alongside other existing, consented, and foreseeable developments. This arises because the assessment is founded on baseline data from the Environmental Impact Assessment that understates effects across landscape, heritage, and socio-economic factors. As a result, the starting point for cumulative evaluation is already diminished, leading to a systematic underestimation of the true cumulative impacts.

Furthermore, the flawed baseline assessments compromise the reliability of the cumulative impact conclusions. Since each component assessment underreports the degree of harm or change, the cumulative assessment compounds these inaccuracies rather than correcting them. This methodological weakness means that decision-makers are not presented with a robust understanding of how this proposal interacts with other developments, thereby undermining confidence in the planning process and its outcomes.

The applicant's submission fails to meet the requirements set out in GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the Environmental Impact Assessment (EIA) Regulations regarding project splitting and the assessment of cumulative effects. Unlike a comprehensive assessment approach, which would integrate all elements of a project to fully appraise environmental impacts, the current proposal does not adequately consider the combined and in-combination effects of the development. This omission undermines the ability to evaluate the overall environmental consequences accurately and limits the effectiveness of any proposed mitigation measures.

Furthermore, the applicant has not explicitly addressed the implications of deferred works within the project scope, which is a critical factor in understanding the full extent of environmental impacts. The decision-making process requires clear and transparent consideration of these deferred elements to ensure compliance with relevant policies and regulations. Without this explicit treatment, there is a significant

risk that the cumulative impacts remain underestimated, leading to an incomplete assessment that could result in adverse environmental consequences going unmitigated. It is therefore requested that the deferred works be expressly addressed and integrated within the determination to uphold policy compliance and environmental protection standards.

1.1.101 Public Engagement, Site Selection and Environmental Information

The applicant requests that Scottish Ministers place significant weight on the site-selection process; consequently, the quality of public participation throughout that process is directly relevant. However, deficiencies in participation identified at both the plan and site-selection stages have persisted into the application stage. The application itself consists of many thousands of pages of technical material, yet the consultation period has coincided with the busiest months for island communities, during which residents are continuously engaged in work throughout the visitor season and access to specialist advice is at its lowest. This stands in stark contrast to the applicant's advantage of having had years to prepare its case, supported by substantial professional and financial resources.

National Marine Plan policy GEN 18 and the principles of effective public participation enshrined in the Aarhus Convention require that those affected by decisions of this magnitude be afforded a realistic opportunity to engage. The conditions under which the affected communities have been expected to respond fall short of this standard. It is therefore incumbent on the Scottish Ministers to bear these shortcomings firmly in mind when considering the representations made, recognising that the consultation process as conducted undermines the legitimacy of the site-selection process.

The practical consequence of the insufficiency of the Environmental Impact Assessment (EIA) submitted is that the Scottish Ministers are unable to make a fully informed decision on the application. The EIA serves as the principal evidential basis for determination, and its sufficiency, rather than its extent, is the critical issue. Across key topics, the application identifies potential significant effects but either fails to investigate them comprehensively or employs methodologies that do not substantiate the conclusions reached. For example, the landscape assessment presents outcomes based on a distance pattern not supported by its own written methodology; the heritage assessment does not demonstrate the application of its own integrity test; and the socio-economic assessment lacks place-based analysis pertinent to the affected islands. Furthermore, the reliance on future assessments, post-consent plans, monitoring, and additional approvals is inadequate, as the EIA Regulations require that likely significant effects are understood prior to determination. Consequently, the Scottish Ministers must base their decision on the evidence presently before them, not on the assumption that unresolved matters will be satisfactorily addressed later. The applicant has not demonstrated that the environmental information provided meets this requirement, rendering the EIA insufficient for the purpose of determination.

1.1.102 Effects on Local Area

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

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

The applicant's Coastal Character assessment recognises the Sound of Iona as an area of High sensitivity with direct orientation towards the development, extensive visibility, and a large geographical extent of change. This assessment notes effects on the ferry crossing between Fionnphort and Iona, concluding an overall effect that is Moderate and Significant across approximately 21 kilometres, with turbines extending over about 39 degrees of the horizon. Similarly, the West Coast of Iona is identified as highly sensitive with widespread visibility, and the applicant acknowledges significant effects on residents and visitors across much of the island, including at Dùn Ì, Iona's highest point. Despite this, the scale and significance of these visual impacts appear to be understated in the applicant's evaluation, particularly when considering familiar visual references. For instance, Ben Hynish on Tiree, which is 141 metres high and visible from Iona at around 33 kilometres, would be overtopped by the largest turbines by approximately 194 metres at roughly two-thirds of that distance, indicating a far greater perceived scale than conveyed by the applicant.

Beyond visual effects, the applicant's assessment inadequately addresses the profound heritage and community impacts on Iona. The island's monastic landscape, including the Abbey, the Nunnery, and the high crosses, is of international importance, with significance intrinsically linked to pilgrimage, arrival by sea, and movement through the landscape, as acknowledged in the applicant's baseline studies. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet no visualisation is provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, a notable omission given the heritage context. Furthermore, a household consultation on Iona revealed that 92 per cent of respondents object to the proposal, yet the applicant's own consultants identified habitability as a pathway of potential effect on this community, which was never formally assessed. Taken together, these omissions and underestimations compromise the accuracy and completeness of the environmental and social impact

evaluation regarding Iona, warranting a more robust and comprehensive assessment of the significant effects on this sensitive and internationally important island.

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 of impacts on wider seaboard designated landscapes and island communities notably underestimates the significance of effects when compared to established mitigation considerations. For instance, Ulva, situated within the Loch na Keal National Scenic Area, is a community-owned island undergoing regeneration. Its recovery is intrinsically linked to the preservation of the unspoilt seascape and setting, yet no specific assessment of effects on Ulva has been provided. This omission is critical given Ulva's reliance on the very qualities at risk. Similarly, Staffa, another island within the same National Scenic Area and renowned as one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development area—beyond the 30-kilometre range NatureScot recommended for assessment. Despite acknowledging the panoramic maritime qualities present, the applicant concludes that the scale of change would be small and the effect not significant, a position that appears insufficiently precautionary given the island's recognised value.

Further scrutiny reveals a comparable pattern in the assessment of other designated landscapes. The Jura National Scenic Area, designated partly for its wild and

undeveloped Atlantic outlook, is assessed at High sensitivity but attributed only Medium to Low magnitude of impact due to distance and retained landforms, approximately 28 to 32 kilometres away. The Scarba, Lunga and the Garvellachs National Scenic Area, located roughly 35 to 40 kilometres from the development, receives a similar evaluation. This approach tends to discount the cumulative and qualitative importance of these seascapes' wild character, thereby diminishing the perceived significance of potential impacts. Taken together, these factors demonstrate that the applicant's assessment fails to fully account for or mitigate significant effects on both important designated landscapes and vulnerable island communities, thereby undermining the protection of their natural and cultural qualities.

The applicant's assessment categorises the South Tiree coastal area as having High sensitivity at a distance of approximately 35 kilometres, yet attributes only a Low magnitude of change to the proposed development. This characterisation warrants further scrutiny. Tiree is an exceptionally low-lying island, with its landscape character fundamentally shaped by the dominance of sea and sky. Its highest elevation, Ben Hynish, reaches merely 141 metres above sea level. Given this context, the introduction of turbines up to 335 metres in height would represent vertical elements unprecedented within Tiree's open oceanic horizon. Such structures would inevitably alter the island's distinctive seascape character in a manner far more substantial than the assessment acknowledges. Therefore, the conclusion of a Low magnitude of change for a receptor as exposed and sensitive as Tiree appears to significantly understate the true magnitude of impact, undermining the reliability of the overall evaluation.

While the applicant's assessment applies distance-based moderation to mitigate perceived effects on seascape receptors, this approach appears insufficient when considering communities with direct views and economic reliance on the seascape. For instance, Gigha, a community-owned island renowned nationally for its successful regeneration, faces the proposed development from the east. Despite its finely balanced community and economy, no specific examination of the potential impacts on Gigha has been undertaken, leaving a notable gap in the assessment's comprehensiveness.

Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas represent exactly the type of receptor to which the applicant's distance-based mitigation is applied, yet the significance of such views to local tourism and community character suggests a need for more detailed consideration beyond simple spatial separation.

Furthermore, the west coast of Kintyre encompasses a series of communities whose outlook, character, and visitor economy are intrinsically linked to the open Atlantic seaboard facing Islay, Jura, and adjacent waters. The Treshnish Isles, alongside other small islands and mainland coasts overlooking the development area, share this position. The absence of targeted assessment for these locations undermines confidence in the applicant's conclusions and suggests that the potential effects on these seascape-dependent communities remain insufficiently understood.

The applicant’s assessment adopts a distance-based methodology that systematically moderates the magnitude of change and discounts the significance of effects on highly sensitive receptors located beyond approximately 20 kilometres. This approach results in a notable deficiency: the communities residing in these more distant areas have not been subject to any place-based assessment. Consequently, the environmental impact assessment fails to fully account for significant effects on sensitive receptors beyond this arbitrary distance threshold, thereby undermining the overall integrity and comprehensiveness of the evaluation.

1.1.103 Summary

The proposal for the MachairWind Offshore Wind Farm fails to meet the requisite statutory and policy standards governing its determination. The applicant’s own evaluation acknowledges substantial impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal region. Independent analysis of the submitted documents reveals that these impacts have been consistently underestimated. Notably, a comprehensive heritage assessment, mandated by policy, has not been conducted. Additionally, while the potential effects on the island communities have been identified, no formal assessment of these impacts has been undertaken. The applicant has also not demonstrated compliance with the necessary ecological criteria. Furthermore, the application before the Scottish Ministers is incomplete, as it only addresses a portion of the overall project.

Given these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to deny the associated marine licence. Should the Ministers be inclined not to refuse the application outright, I request that they require the submission of further environmental information alongside enhanced visualisations. I also propose that the applications be adjudicated only following a public inquiry, enabling a thorough examination of the issues raised in this objection. Regardless of the final determination, I ask that the Ministers explicitly articulate their conclusions on the impacts to cultural heritage and the island communities in their decision statement.

Yours faithfully,

[Redacted]

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

Member of the public 512
Dear Sir/Madam,

I hereby register a formal objection to the MachairWind Offshore Wind Farm proposals, submitted under application numbers 00012385 for consent pursuant to section 36 of the Electricity Act 1989, and 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. This letter should be recorded as an objection, with my status as an objector noted, and I request to be informed of the outcome of these applications.

The development under consideration involves the construction of an offshore wind farm with a generating capacity of approximately 2 gigawatts. The project encompasses between 91 and 144 turbines, each reaching up to 335 metres to blade tip, situated within a designated Windfarm Development Area extending over approximately 448 square kilometres. This area lies to the north-west of Islay and west of Colonsay, at an approximate distance of 21 kilometres from Iona, and is in close proximity to the islands and coastal communities of the southern Hebrides.

The subsequent sections articulate the grounds for objection, grounded in both planning and environmental considerations. These are framed by the statutory and policy context that governs the determination of these applications. It is important to emphasise that the onus of proof lies entirely with the applicant, who must provide adequate evidence to satisfy the relevant statutory and policy tests. Objectors bear no obligation to disprove the proposals. Having carefully assessed the evidence presented, it is clear that the applicant has failed to meet this burden, and accordingly, consent should be withheld.

1.1.104 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties under Schedule 9 of the Electricity Act 1989, which require the applicant to have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant must take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The evidence confirms that these requirements have not been adequately addressed. As a result, the application contains deficiencies and omissions that conflict with the applicable legal and policy framework. Such failures weigh decisively against the granting of consent.

The marine licence application must be refused because it fails to comply with the statutory requirements of the Marine (Scotland) Act 2010 and the relevant policies of Scotland’s National Marine Plan. Under Part 4 of the Marine (Scotland) Act 2010, authorisation decisions are legally required to be taken in accordance with the National Marine Plan unless other relevant considerations apply. This application has not demonstrated compliance with key General Policies that are integral to the statutory assessment process.

Specifically, the application does not satisfy the requirements of GEN 4 (Co-existence), which governs the need to ensure compatible use of marine resources;

GEN 6 and paragraphs 4.22 to 4.23 concerning the protection of the Historic Environment; GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas; GEN 9 addressing Natural Heritage; GEN 13 and GEN 18 (Engagement), which require effective consultation and stakeholder involvement; GEN 19 and paragraph 4.81 mandating the use of Sound Evidence; and GEN 21 and paragraph 4.85 on the assessment of Cumulative Impacts. The absence of demonstrated compliance with these policies constitutes a fundamental deficiency in the application.

Moreover, where compliance with these statutory policies has not been established, or where the evidence reveals deficiencies, omissions, or conflicts with the applicable legal and policy framework, these shortcomings must weigh decisively against the granting of consent. The application's failure to meet these essential statutory and policy criteria means it cannot lawfully be approved.

In conclusion, the marine licence application does not comply with the Marine (Scotland) Act 2010 or the relevant provisions of Scotland's National Marine Plan. The identified failures and omissions in meeting the statutory policies require that the application be refused.

The applicant's submission must be considered in the context of National Planning Framework 4 (NPF4), which is a significant material consideration and is required to be applied alongside relevant statutory duties and legislative requirements. The proposal engages several key policies within NPF4, specifically Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy). These policies set out clear expectations for the protection and enhancement of biodiversity, natural environments, historic assets, and energy considerations, all of which are directly relevant to the assessment of this application.

However, the evidence before the determining authority does not demonstrate compliance with these policies. There are identified deficiencies and omissions in the applicant's submissions that fail to satisfy the requirements of NPF4. In particular, the proposal conflicts with the applicable legal and policy framework governing biodiversity, natural places, historic assets, and energy. As set out in the evidence, where compliance has not been demonstrated or where such conflicts exist, these matters must weigh against the granting of consent. Therefore, the proposal should be refused on the basis that it fails to comply with the key policies of National Planning Framework 4.

The proposal fails to comply with the fundamental legal requirements set out in the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations, which mandate that the likely significant environmental effects of any development must be thoroughly identified, assessed, and reported prior to determination. This statutory obligation is not met in the current submission, resulting in a deficient environmental impact assessment that precludes a lawful and informed decision-making process. Without a comprehensive and robust assessment, the determining authority cannot properly evaluate the environmental consequences of the proposal, thereby undermining the integrity of the planning process.

Furthermore, the proposal does not satisfy the requirements of the Habitats Regulations, which explicitly require an assessment of the effects on European protected sites in accordance with the applicable statutory tests. The absence of a demonstrably adequate habitats regulations assessment means that the potential impacts on protected habitats and species have not been properly considered or mitigated. This omission is a critical failure, as it contravenes statutory duties designed to safeguard biodiversity and protected sites, and it prevents the authority from fulfilling its legal obligations under the Habitats Directive and related domestic legislation.

Given these clear deficiencies and omissions in both the environmental impact assessment and the habitats regulations assessment, the proposal is in direct conflict with the applicable legal and policy framework. Where compliance with these statutory requirements has not been demonstrated, the law and planning policy dictate that such failures must weigh decisively against the granting of consent. Consequently, the application should be refused on the grounds that it does not meet the essential environmental assessment and habitats protection standards required by law.

The applicant's submission does not demonstrate compliance with the requirements set out in the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be considered and given due weight during the decision-making process. This statutory obligation is clear and unambiguous, as established in the Act and reiterated in the supporting evidence (S01). The proposal fails to provide adequate evidence that these interests have been properly identified, assessed, or balanced in accordance with the legal framework.

Furthermore, the absence of any substantive analysis or documentation addressing the specific impacts on island communities constitutes a significant omission. This deficiency undermines the transparency and robustness of the decision-making process and conflicts directly with the statutory duty imposed by the Islands (Scotland) Act 2018. Where such compliance has not been demonstrated, or where evidence reveals omissions or conflicts with the applicable legal and policy framework, these matters must weigh against the granting of consent (S01).

In conclusion, the proposal's failure to properly consider and give due weight to the interests of island communities as required by the Islands (Scotland) Act 2018 represents a material shortcoming. This non-compliance is a substantive planning concern that should lead to the refusal of consent.

The practical consequence of the applicant's failure to provide robust, objective, and proportionate evidence demonstrating compliance with all relevant statutory duties, planning policies, and environmental assessment requirements is that the application cannot be lawfully approved. The evidential burden rests squarely on the applicant to prove that every applicable legal and policy framework has been satisfied. Without such demonstration, the decision-maker is left without the necessary assurance that the proposal meets the comprehensive standards set by legislation and policy.

The submitted evidence does not establish that the applicant has fulfilled this responsibility. There are clear deficiencies and omissions in the documentation

provided, and no conclusive proof has been presented to confirm adherence to all statutory and policy obligations. This absence of demonstrable compliance undermines the integrity of the application and directly conflicts with the established legal and planning framework. As a result, the application fails to meet the fundamental requirements for lawful consent.

Given these shortcomings, the application must be refused. The failure to demonstrate compliance with the full suite of legal and policy requirements is a decisive factor that weighs heavily against granting consent. It is incumbent upon the determining authority to uphold the statutory and policy safeguards by rejecting proposals that do not meet the evidential standards necessary to confirm lawful and policy-compliant development.

1.1.105 Conflict with National Planning Framework 4 and the Development Plan

The practical consequence of the proposed development is that it fails to meet the impact criteria established in NPF4 Policy 11, thereby undermining the policy's intended support for renewable energy projects. Although NPF4 Policy 11 endorses renewable energy development, this support is expressly conditional upon compliance with its specified impact criteria, including those concerning effects on communities, landscapes, seascapes, and other receptors. The proposal does not adhere to these requirements, resulting in significant adverse outcomes that cannot be justified within the policy framework.

More specifically, the proposal would cause substantial harm to nationally designated landscapes and seascapes, which are afforded particular protection under Policy 11(d) and 11(e). Furthermore, the submission fails to demonstrate that the cultural significance of scheduled monuments and their settings would be preserved, as required by the policy. The lack of evidence to safeguard the integrity of these heritage assets is a critical shortcoming. In addition, the proposal does not convincingly show that island communities, which Policy 11(c) seeks to protect, would be adequately safeguarded from detrimental impacts arising from the development.

Finally, the ecological considerations set out in the policy have not been satisfactorily addressed. The evidence submitted does not establish that the ecological tests can be met, leaving significant uncertainties regarding potential environmental harm. Taken together, these deficiencies mean that the proposal conflicts with NPF4 Policy 11's impact criteria in multiple respects. Consequently, it cannot be supported as compliant with the national planning framework's requirements for responsible and sustainable renewable energy development.

The proposal would result in significant adverse effects on nationally designated landscapes and seascapes, undermining their protected qualities. This outcome directly conflicts with Policy 11 and related provisions within the National Planning Framework 4, which collectively seek to preserve the character and value of National Scenic Areas and other nationally important landscapes. The failure to safeguard these designated assets would erode the very reasons for their recognition and protection under the Framework.

Furthermore, the proposal does not demonstrate adequate protection for the cultural significance of scheduled monuments or their settings, as required by Policy 7 and its subsections. The absence of evidence that these heritage assets would be preserved raises serious concerns regarding the impact on the historic environment. In addition, there is no satisfactory assurance that island communities, which often possess distinct cultural and environmental characteristics, would be effectively safeguarded, contrary to the expectations set out in the Framework.

Lastly, the ecological assessments submitted fail to show compliance with the necessary biodiversity tests outlined in Policy 3. Without clear evidence that these ecological standards can be met, the proposal cannot be deemed consistent with NPF4's commitment to biodiversity conservation. Taken together, these shortcomings establish that the proposal is incompatible with multiple policies designed to protect designated assets of national importance.

The assessment finds that the proposal is inconsistent with the terrestrial development plan framework relevant to land-based effects, including the Argyll and Bute Local Development Plan 2. It would adversely affect the landscape, heritage, and community interests that these policies are designed to protect. This conflict with key elements of the development plan is clear and significant.

Furthermore, the proposal does not align with the broader strategic objectives set out in National Planning Framework 4 when considered in its entirety. The applicant has not provided sufficient evidence or justification to demonstrate that these conflicts can be mitigated or outweighed by other considerations. As a result, the proposed development fails to meet the requirements of the applicable planning policy framework.

In conclusion, given the identified adverse impacts and the absence of adequate demonstration to the contrary, it is appropriate to determine that the proposal is contrary to the relevant development plan policies. This inconsistency weighs against the proposal's acceptability in planning terms.

1.1.106 Seascape, Landscape and Visual Effects

There is considerable uncertainty regarding the reliability of the applicant's assessment methodology, particularly in relation to the treatment of distance thresholds and their influence on the predicted magnitude of effects. Notably, the applicant's written methodology, as set out in Appendix 16.1, does not specify any distance threshold beyond which major effects would cease. Despite this omission, an independently prepared Evidence Note, drawing solely from the applicant's Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern across all three assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of the receptor's inherent sensitivity or the extent of visibility. Furthermore, the applicant's own documents acknowledge the role of distance in these judgements. For example, the assessment of a coastal area situated over 30 kilometres away explicitly states that, given the viewing distance, the scale of change is judged to be small. The Landscape Character synthesis similarly describes a gradation of effects, with High magnitude of change within

roughly 20 kilometres, Medium between approximately 20 and 30 kilometres, and Low beyond about 30 kilometres for certain landscape types. The implication of this approach is that the protective tests are applied to inputs that are systematically understated. Since the magnitude of change is moderated precisely at the distances where the most sensitive designated landscapes are located, the conclusions presented do not provide a reliable description of the effects for which Scottish Ministers are being asked to grant consent. This raises significant concerns about the robustness and accuracy of the applicant's impact assessment.

In considering the visualisations presented in support of the application, it is important to note that the mitigation measures proposed rely heavily on these materials to demonstrate their effectiveness in reducing visual impact. However, a detailed analysis reveals inherent limitations in the visual evidence that must temper reliance on such representations. NatureScot's visualisation guidance, which the applicant follows, explicitly recognises that printed visualisations cannot fully replicate the scale and perception experienced by a viewer on site. This acknowledgment highlights a fundamental constraint: the visualisations serve as approximations rather than exact portrayals of the landscape effects. Moreover, the wireline drawings incorporated within the panoramic projections share these inherent limitations. As technical renderings embedded within the photographic visualisation, they do not function as independent corrections or clarifications to the imagery but rather inherit the same perceptual shortcomings. Consequently, while the visual materials provide a useful tool for assessment, their inability to fully convey the true scale and visual experience in the field means that any conclusions drawn from them should be made cautiously. In summary, the visualisation evidence, despite its utility, presents technical and perceptual limitations that reduce its capacity to serve as definitive proof of mitigation success.

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

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

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

1.1.107 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment fails to demonstrate compliance with the required methodology for evaluating the impact on the setting of historic assets, thereby undermining the reliability of its conclusions regarding heritage effects. Although the applicant adopts Historic Environment Scotland's established methodology, which mandates an evaluation of whether changes to setting affect the contribution setting makes to cultural significance and whether the integrity of setting is adequately retained, the assessment does not follow through on this crucial evaluative step. Instead, it focuses primarily on describing visual changes—considering factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—before asserting that the integrity of setting is adequately retained. A Methodological Audit, based solely on the applicant's Appendix 14.3, confirms that while heritage attributes are identified, there is no clear demonstration of how the integrity of setting has been assessed in accordance with the applicant's own accepted methodology. Without this critical evaluation, the assessment's conclusions about heritage impacts lack the necessary evidential foundation.

The applicant's baseline assessment acknowledges that the cultural significance of the affected heritage assets is intrinsically linked to experiential qualities such as pilgrimage, arrival by sea, and movement through a living cultural landscape. This significance arises from the dynamic relationships between monuments, spirituality, and the encompassing landscape and seascape, which are fundamentally experienced through movement rather than static viewpoints. Such recognition underscores the importance of evaluating heritage impacts within the context of the broader cultural landscape and the lived experience it offers.

Nevertheless, Historic Environment Scotland's consultation responses, as documented in the application, highlight a concern that the applicant's assessment may not fully capture these wider qualities. In particular, they requested additional viewpoints to ensure that the comprehensive cultural and experiential dimensions are properly represented. This suggests that the current assessment framework may inadequately reflect the full baseline qualities, thereby limiting the robustness of heritage impact evaluation. Addressing this gap is essential to accurately appraise the significance and potential effects on the heritage assets in their cultural context.

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

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

Given that the applicant has not demonstrated compliance with these established policy requirements, the proposal cannot be considered to meet the standards necessary for approval. Consequently, the application should be regarded as

deficient in its protection of heritage assets and, therefore, unacceptable in its current form.

1.1.108 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development rely to an exceptional degree on visitors who are drawn specifically by the landscape, seascape, cultural heritage, tranquillity and remoteness identified in the applicant's own baseline assessments. Any alteration to these fundamental qualities would directly undermine the economic foundations of these communities. This impact would not only affect local businesses but also jeopardise essential services, population stability and the long-term viability of the island settlements. Consequently, the proposal poses a significant threat to the economic and social sustainability of these island communities by compromising the very attributes that attract and sustain their visitor economy.

In considering the adequacy of the applicant's socio-economic assessment of impacts on island communities, it is instructive to compare the thoroughness of the analysis applied to port communities with that directed towards the islands themselves. The assessment in Chapter 18 offers a detailed examination of potential effects on port communities, reflecting a place-based approach that acknowledges their particular circumstances. However, this level of scrutiny is not extended to the island communities directly facing the development, where the assessment remains at a broad regional scale. This inconsistency raises concerns about the reliability of the conclusions drawn, particularly regarding the sensitivity of island communities to tourism-related changes.

The applicant's own consultants highlight habitability as a potentially significant pathway through which the proposal could affect island communities. Despite this recognition, no specific assessment of the habitability of the islands was conducted. Instead, the socio-economic evaluation concludes that the island communities exhibit low sensitivity to tourism effects, a determination reached without any place-based analysis. Such an approach overlooks the distinctive characteristics of small island economies, which are markedly different from regional averages. These economies are heavily reliant on sectors that are directly influenced by the qualities attracting visitors. Consequently, increasing visitor numbers do not mitigate sensitivity; rather, they amplify the communities' dependence on attributes that may be vulnerable to change.

Given these considerations, the conclusion of low sensitivity for island communities appears unfounded and is better characterised as an assumption rather than evidence-based. The absence of a tailored, place-specific socio-economic assessment undermines confidence in the applicant's methodology and its capacity to understand or mitigate impacts on island communities adequately. It would be prudent for the assessment to incorporate detailed, island-focused analysis to ensure that the particular vulnerabilities and dependencies of these communities are fully recognised and addressed in the planning process.

While mitigation measures have been proposed, they fall short when compared to the specific requirements set out for island communities under current policy and

statutory duties. The proposal fails to meet the standards of GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions be founded on robust socio-economic evidence and a precautionary approach where evidence is insufficient. Furthermore, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 require that the interests of island communities are thoroughly assessed and given meaningful weight through engagement from the earliest stages to completion. The applicant has acknowledged the need for particular scrutiny of island communities but has not undertaken the necessary assessments to understand the potential effects on these populations. As a result, it has not demonstrated compatibility with sustainable island communities, nor has it discharged the statutory duties owed to them. This fundamental omission undermines the proposal's compliance with essential planning and legal requirements.

1.1.109 Ecology, Biodiversity and Habitats Regulations

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

The applicant's submission includes a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are typically prepared when an adverse effect on the integrity of a protected site cannot be definitively ruled out. Their inclusion in the application therefore signals the recognition by the applicant of potential harmful impacts, while also presenting proposed mitigation measures intended to address these concerns.

However, the submission of these documents also implies an underlying uncertainty, as the applicant acknowledges that Scottish Ministers may ultimately reach a different conclusion regarding the presence or severity of adverse effects. This acknowledgement underscores the need for careful scrutiny of the proposed compensation and derogation measures to ensure they are adequate and effective in safeguarding the protected guillemot population and the integrity of the designated site.

The assessment of the submitted evidence, notably the applicant's own derogation documentation, reveals a fundamental failure to satisfy the statutory tests designed to protect internationally important habitats and species. This lack of demonstrable compliance undermines the legal safeguards intended to prevent harm to these ecological features. Consequently, the application does not meet the required legal standards, thereby weakening the justification for granting consent.

1.1.110 Cumulative and In-Combination Effects

The current approach to assessing the project is fundamentally flawed because it fragments the overall development, thereby undermining a comprehensive evaluation of its impacts. Only part of the project is presently before the Scottish Ministers; crucial components such as the export cable corridor and onshore transmission works, which are indispensable for the operation of the wind farm, have been deferred to subsequent applications. This piecemeal consideration prevents the cumulative effects of the entire project from being evaluated collectively at this stage, leading to an incomplete understanding of its overall environmental and planning implications.

This method of separating key elements for later consideration contravenes established legal principles. The courts, in Raeshaw Farms, have affirmed that a project must be assessed in its entirety rather than being artificially divided into smaller parts whose individual effects may appear less significant. By deferring important components to future consenting processes after the principal decision has been made, the approach fails to provide a holistic appraisal as required by law and sound planning practice. Consequently, the assessment as it stands does not meet the necessary standards for a full and proper evaluation of the project's impacts.

The cumulative impact assessment is fundamentally compromised by its reliance on baseline evaluations that understate the true effects of the proposed development. This flaw becomes evident when considering that the cumulative assessments are contingent upon the findings of the Environmental Impact Assessment's individual components. Specifically, where the initial landscape, heritage, and socio-economic assessments minimize the extent of adverse effects, the cumulative analysis is predicated on this diminished baseline. Consequently, the aggregation of impacts from this proposal alongside other existing, consented, and foreseeable developments is similarly underestimated. This methodological weakness undermines the reliability of the cumulative impact conclusions and suggests that the combined effects are more significant than reported. It is therefore essential that the baseline assessments be revisited to ensure an accurate and robust cumulative evaluation.

The applicant's failure to adequately address the cumulative and in-combination effects of the proposal falls short of the mitigation standards required by relevant planning policies and environmental regulations. This deficiency engages GEN 21 and paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), as well as the Environmental Impact Assessment Regulations concerning project splitting. Crucially, the assessment does not reliably identify or evaluate the overall effects of the project, including deferred works. It is therefore imperative that the decision-making process explicitly considers these deferred elements to ensure full compliance with policy and regulatory requirements.

1.1.111 Effects on Local Area

The applicant's mitigation measures fail to adequately address the significant direct effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby undermining the reliability of the environmental and heritage impact assessment. Islay and Colonsay are the closest islands to the proposed development, which lies immediately north-west of Islay and west of Colonsay within

a 448 square kilometre area. However, the application predominantly considers Islay only as a potential project location, neglecting a place-based assessment of how its Atlantic-facing communities would be affected in terms of setting, economy, and community life. For Colonsay and Oronsay, whose seaward outlook defines daily existence, the development array lies directly offshore. The North Colonsay and Western Cliffs Special Protection Area, located on Colonsay's coastline, is central to the applicant's derogation case and compensation plan, yet it simultaneously acknowledges that harm to the internationally protected seabird population there cannot be excluded. Furthermore, Oronsay Priory, a scheduled monument of national importance situated within this community, suffers from the same deficiencies in heritage assessment, particularly in relation to the treatment of its open maritime setting. These omissions collectively demonstrate that the applicant's evaluation underestimates the true extent of effects on these island communities and their heritage assets.

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

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

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

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

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

The applicant's assessment of the proposed development significantly underestimates the extent and significance of effects on designated seaboard landscapes and adjacent island communities, with tangible consequences for their natural and cultural integrity. Notably, the community-owned island of Ulva, located within the Loch na Keal National Scenic Area, is omitted entirely from specific assessment despite sharing fully in the landscape effects. Ulva is a small, re-establishing community whose ongoing recovery depends critically on the preservation of its unspoilt seascape and setting—the very qualities threatened by the development. The absence of any targeted assessment for Ulva fails to acknowledge the practical implications for this vulnerable island community.

Similarly, the applicant's conclusions regarding nearby celebrated islands such as Staffa, also within the Loch na Keal National Scenic Area, appear insufficiently robust. Staffa lies approximately 35 kilometres from the development, beyond the 30-kilometre radius recommended by NatureScot for assessing effects on National Scenic Area qualities. Despite acknowledging the island's panoramic maritime qualities, the applicant discounts the scale of change as small and the effect as not significant. This approach does not fully reflect Staffa's status as one of Europe's most renowned small islands, nor does it recognise the potential cumulative impact on the wider seascape character that contributes to its designation.

Further afield, the assessment of the Jura National Scenic Area at 28 to 32 kilometres distance attributes a High sensitivity but limits the magnitude of change to Medium or Low, reasoning that distance and retained landforms moderate the impact. This reasoning is similarly applied to the Scarba, Lunga and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres from the development. However, the designation of these areas is fundamentally based on their wild, undeveloped Atlantic outlooks, qualities that may be compromised even by moderate changes in seascape character. Taken together, these considerations demonstrate that the applicant's assessment inadequately addresses the significance of effects on key seaboard landscapes and island communities, undermining the protection of their valued natural and cultural attributes.

The applicant's assessment assigns a Low magnitude of change to the South Tiree coastal area despite recognising its High sensitivity at approximately 35 kilometres. This classification underestimates the extent of impact when compared to standard mitigation approaches for similarly sensitive landscapes, where a higher magnitude would typically be acknowledged to reflect the significant visual intrusion and landscape alteration posed by large-scale developments. The failure to align the magnitude assessment with the known sensitivity of the receptor results in a mitigation strategy that is insufficiently robust to address the actual scale of impact.

Tiree's distinctive landscape character, defined by its exceptionally low-lying topography and the dominance of sea and sky, further undermines the credibility of the Low magnitude conclusion. With its highest point, Ben Hynish, rising only 141 metres, the introduction of turbines up to 335 metres tall represents an unprecedented vertical intrusion into the seascape. This stark contrast between the island's natural horizon and the proposed structures necessitates a reassessment that recognises a greater magnitude of change. The understatement of effects leads to an unreliable evaluation of impacts on Tiree, compromising the integrity of the overall landscape and visual assessment.

While the applicant's assessment includes certain mitigation measures aimed at moderating the visual and economic impacts of the proposed development, these measures fall short in adequately addressing the effects experienced by mainland and island communities with direct seascape connections to the site. The reliance on distance-based moderation fails to capture the nuanced and significant influence the development would have on receptors such as Ardnamurchan Point, where panoramic views along the Hebridean seaboard contribute substantially to local tourism. The application's approach thus inadequately accounts for the high-quality seaward panoramas that are central to the visitor experience and economic vitality of the peninsula.

Moreover, the assessment omits a thorough examination of communities on the west coast of Kintyre, whose outlook, character, and visitor economy are intrinsically linked to the open Atlantic seaboard. These communities, alongside the Treshnish Isles and other small islands and mainland coasts facing towards the development, rely heavily on the visual and environmental integrity of these waters. The lack of consideration given to these receptors undermines the comprehensiveness of the assessment and risks overlooking cumulative impacts that may affect the sustainability of local economies and the preservation of community identity.

In addition, the omission of any evaluation of effects on Gigha, a community-owned island that stands as a national symbol of island regeneration, is particularly concerning. Gigha's eastern outlook towards the development area means that its finely balanced community and economy could be materially affected. The failure to include Gigha in the applicant's assessment represents a significant gap, limiting the understanding of the full range of consequences and thereby weakening the robustness of the environmental appraisal. Consequently, the assessment should be revisited to incorporate these critical receptors to ensure a more comprehensive and equitable evaluation of the proposed development's impacts.

There remains considerable uncertainty regarding the applicant's methodology for assessing effects on sensitive receptors beyond 20 kilometres. This uncertainty arises because the applicant's approach systematically moderates the magnitude of change and discounts the resulting effects at these distances. As highlighted in the evidence, wherever a highly sensitive receptor lies beyond approximately 20 kilometres, the assessment diminishes the significance of impact without providing any place-based evaluation of the communities affected. Such an approach inevitably undermines the integrity of the environmental impact assessment, as it fails to properly account for and address the experiences of those living with these

effects. Given these concerns, the assessment cannot be regarded as comprehensive or robust in its current form.

1.1.112 Summary

The proposal before the Scottish Ministers has not been substantiated with sufficient evidence to demonstrate compliance with the relevant statutory and policy frameworks governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities of the coastal area in question. However, independent analyses of the applicant's documentation reveal that these impacts have been understated. Crucially, the mandatory heritage assessment has not been completed. Furthermore, while the effects on the island communities affected by the development were identified, they were never subjected to proper assessment. The ecological criteria necessary for approval have not been convincingly met. Additionally, it is important to note that only a portion of the project currently lies within the remit of the Scottish Ministers.

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

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

Yours faithfully,

[Redacted]

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

Member of the public 513
Dear Sir/Madam,

I hereby register a formal objection to the MachairWind Offshore Wind Farm proposals, submitted under application numbers 00012385 for consent pursuant to section 36 of the Electricity Act 1989, and 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. These applications, lodged by MachairWind Limited (ScottishPower Renewables), seek approval for an offshore wind energy development with an installed capacity of approximately 2 GW. The project envisages the installation of between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip, situated within a designated Windfarm Development Area that spans roughly 448 square kilometres of marine environment. This area lies to the north-west of Islay and west of Colonsay, approximately 21 kilometres from the island of Iona and in close proximity to the southern Hebrides' islands and coastal communities.

The following submission articulates the grounds for objection based on planning and environmental considerations, referencing the statutory and policy frameworks governing the determination of these applications. It is important to emphasise that the onus of proof rests firmly on the applicant to demonstrate, with robust and adequate evidence, that all relevant legal and policy tests are met. Objectors are not required to provide evidence disproving the proposals. Upon examination, it is evident that the applicant has failed to satisfy this evidential burden. Consequently, the proposals do not comply with the applicable tests and therefore consent should be withheld. I request that this letter be formally recorded as an objection, that I be registered accordingly, and that I receive notification of the decision reached on these applications.

1.1.113 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989, which explicitly require the applicant to have regard to the desirability of preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, as well as protecting sites, buildings, and objects of architectural, historic, or archaeological interest. The evidence before the determining authority does not establish that these considerations have been adequately addressed. Furthermore, the applicant has not shown that reasonable steps have been taken to mitigate any adverse effects arising from the proposal on these protected interests. This omission represents a fundamental deficiency in the application's assessment and undermines the statutory framework governing such developments.

In addition, the Scottish Ministers, as the determining authority, are mandated by Schedule 9 to have regard to the same statutory duties. The failure of the application to demonstrate compliance with these duties, coupled with the identified deficiencies and omissions in the evidence, constitutes a clear conflict with the applicable legal and policy framework. Such conflicts weigh decisively against the granting of consent. The absence of satisfactory evidence addressing these statutory requirements renders the application incomplete and legally deficient, necessitating refusal on the grounds of non-compliance with Schedule 9 of the Electricity Act 1989.

The marine licence application under consideration must be determined in accordance with Part 4 of the Marine (Scotland) Act 2010 and the policies set out in Scotland's National Marine Plan. The applicant has not demonstrated compliance with the relevant statutory requirements and the applicable National Marine Plan policies, which include but are not limited to GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts). These policies collectively form an integral part of the statutory assessment framework for the application.

The evidence clearly indicates that the application fails to meet the standards required by these policies. There are identifiable deficiencies and omissions within the submission that undermine the statutory assessment process. In particular, the application does not provide sufficient or sound evidence to demonstrate that the proposal will not adversely affect the historic environment, natural heritage, or landscape and national scenic areas as required by GEN 6, GEN 7, and GEN 9. Furthermore, the application lacks adequate engagement as prescribed by GEN 18, and it does not satisfactorily address cumulative impacts in line with GEN 21. The absence of robust evidence and failure to comply with these policies constitute a direct conflict with the legal and policy framework governing marine licence determinations.

Given these shortcomings, the application does not satisfy the statutory requirements under the Marine (Scotland) Act 2010 and the National Marine Plan. Where compliance has not been demonstrated, and where evidence identifies such deficiencies and conflicts, these matters must weigh against the granting of consent. Therefore, the marine licence application should be refused on the grounds that it fails to comply with the statutory requirements and relevant policies of the National Marine Plan.

The proposal fails to comply with key policies of National Planning Framework 4 (NPF4), which is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. Specifically, the application does not demonstrate compliance with Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy), all of which are directly engaged by this proposal.

The absence of demonstrated compliance with these policies is critical. Policy 3 requires the protection and enhancement of biodiversity, yet the proposal lacks sufficient evidence to show that it will avoid harm or deliver net biodiversity gains. Similarly, under Policy 4, the proposal fails to adequately safeguard natural places, undermining the statutory objective to protect and enhance the natural environment. Policy 7 mandates the conservation and appropriate management of historic assets and places; however, the application does not provide the necessary assurances or assessments to confirm that these assets will be preserved or that any impacts will be appropriately mitigated. Furthermore, Policy 11 on Energy sets out requirements for sustainable energy use and efficiency, which the proposal does not satisfactorily address.

Where compliance has not been demonstrated, or where evidence identifies deficiencies, omissions, or conflicts with the applicable legal and policy framework, these matters weigh decisively against the granting of consent. In this case, the proposal's failure to meet the requirements of NPF4 policies 3, 4, 7, and 11 constitutes a clear conflict with the statutory and policy framework that must be afforded significant weight in the determination process.

In conclusion, the proposal's non-compliance with essential policies of National Planning Framework 4, coupled with the absence of adequate evidence to address these deficiencies, justifies refusal of planning permission. The application does not meet the necessary legal and policy standards required for consent.

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

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

The absence of a robust and compliant EIA and HRA undermines the statutory framework designed to protect the environment and European designated sites. Without these assessments, the determining authority cannot lawfully conclude that the proposal will not have adverse environmental effects or that it meets the stringent requirements of the Habitats Regulations. This failure to provide adequate environmental information and statutory assessment is a direct conflict with the applicable legal and policy framework.

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

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

The proposal fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must

be properly considered and given due weight in the decision-making process. This statutory obligation is clear and unambiguous, as set out in the Act and reiterated in the approved evidence (S01). The absence of any substantive evidence within the application or supporting documentation to show that these interests have been adequately assessed or factored into the planning balance constitutes a significant procedural and substantive deficiency.

Moreover, the failure to address or even acknowledge the specific impacts on island communities represents an omission that conflicts directly with the applicable legal and policy framework. The approved evidence (S01) explicitly states that where compliance with the Islands (Scotland) Act 2018 has not been demonstrated, or where deficiencies and omissions are identified, these matters must weigh against the granting of consent. In this case, the proposal's lack of engagement with the statutory duty to consider island communities' interests is a material shortcoming that undermines the legitimacy of the decision-making process.

In conclusion, the proposal does not meet the statutory requirements of the Islands (Scotland) Act 2018. The failure to properly consider and give due weight to the interests of island communities is a critical flaw that weighs decisively against the approval of this application.

There remains significant uncertainty as the applicant has failed to demonstrate compliance with all relevant legal and policy requirements. It is the applicant's responsibility to provide robust, objective, and proportionate evidence confirming that every statutory duty, planning policy, and environmental assessment obligation has been met. The submitted evidence does not fulfill this burden, leaving deficiencies and omissions unaddressed. Such failures to prove compliance weigh decisively against the granting of consent in this case.

1.1.114 Conflict with National Planning Framework 4 and the Development Plan

There remains considerable uncertainty as to whether the proposal fully satisfies the impact criteria set out in NPF4 Policy 11, which governs support for renewable energy development. While the policy endorses such development, this endorsement is explicitly conditional upon compliance with its detailed impact provisions, including those relating to communities and landscapes.

In particular, Policy 11(c) requires that impacts on communities be carefully considered, while Policies 11(d) and 11(e) address the effects on landscape, seascape and other receptors. The evidence indicates that the proposal would result in significant adverse effects on nationally designated landscapes and seascapes. Moreover, it has not been demonstrated that the cultural significance of scheduled monuments and their settings would be adequately protected, nor that island communities would be safeguarded from detrimental impacts.

Furthermore, the ecological assessments submitted have not shown that the necessary tests can be met. Taken together, these concerns suggest that the proposal conflicts with the impact criteria embedded within Policy 11 and therefore does not fully benefit from the policy's support for renewable energy. This raises

fundamental questions about the appropriateness of the development in this location.

While the proposal might attempt to mitigate some impacts, it nonetheless fails to meet the stringent requirements set out in NPF4 policies that safeguard nationally important assets. Policy 11 must be read in conjunction with Policy 4(c) and 4(d), which protect National Scenic Areas and nationally important landscapes from significant adverse effects, as well as Policy 7—including 7(h) on scheduled monuments and 7(c) and 7(d) relating to the setting of historic assets—and Policy 3 on biodiversity. The evidence demonstrates that the proposal would cause significant adverse effects on these nationally designated landscapes and seascapes. Furthermore, there is no satisfactory demonstration that the cultural significance of scheduled monuments and their settings would be preserved, nor that the interests of island communities would be adequately safeguarded. Crucially, the ecological tests required under Policy 3 have not been shown to be met on the basis of the submitted evidence. Accordingly, the proposal conflicts with multiple core NPF4 policies designed to protect designated assets and should be refused.

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

1.1.115 Seascape, Landscape and Visual Effects

The applicant's assessment methodology, as outlined in Appendix 16.1, notably omits any explicit distance threshold beyond which major effects are considered to cease. However, an independent Evidence Note, which critically examines the applicant's Chapter 16 and related appendices, reveals a consistent pattern: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of that receptor's inherent sensitivity or the extent of visibility. This inherent reliance on distance is further corroborated by the applicant's own documentation, which acknowledges that for a coastal area over 30 kilometres away, the scale of change is judged to be small due to viewing distance. The Landscape Character synthesis likewise categorises magnitude of impact as High within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types.

This systematic moderation of magnitude at distances coinciding with the locations of the most sensitive designated landscapes raises serious concerns regarding the robustness of the assessment's conclusions. By attenuating the perceived magnitude of change precisely where the most important receptors lie, the protective tests applied are effectively based on understated inputs. Consequently, the outcomes presented do not reliably reflect the true effects that the Scottish Ministers are being asked to consent to, thereby undermining confidence in the assessment's capacity to safeguard sensitive landscapes adequately.

The 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. Additionally, wireline drawings included within the same panoramic projections are subject to the same constraints as the accompanying photography. Rather than serving as an independent corrective, these wireline drawings represent a technical rendering embedded within the overall visualisation.

Consequently, the assessment based on these materials must be understood in the context of their technical and perceptual constraints. The inability of printed visuals to convey accurate scale and the dependency of wireline drawings on the underlying photography underscore that these visualisations provide an approximation rather than a definitive representation of the visual impact. This limitation should inform the weight attributed to the visual evidence when considering the proposal's effects on the surrounding environment.

The introduction of aviation and navigation lighting associated with the proposed development would permanently alter the night-time character of the currently unlit sea horizon for the entire 35-year operational period. This change is not merely a temporary effect limited to the lifespan of the development; rather, consenting to this proposal effectively acknowledges that the seascape is appropriate for wind farm use, with all attendant visual and environmental implications. Such a decision sets a precedent for the acceptability of lighting impacts in this sensitive seascape, fundamentally changing its character in a manner that should be carefully weighed against relevant policy considerations.

There remains significant uncertainty regarding the proposal's adherence to the relevant planning policies designed to safeguard landscape and seascape interests. Although certain effects have been identified, the applicant has failed to convincingly demonstrate that their conclusions on the scale of these effects align with their own stated methodology. This inconsistency raises doubts about the reliability of the environmental assessments presented.

Furthermore, the proposal does not adequately demonstrate compliance with policies protecting nationally important landscapes and seascapes, specifically those set out in NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. In light of these shortcomings, the proposal cannot be considered consistent with the necessary policy framework and should not be supported.

1.1.116 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment purports to follow Historic Environment Scotland's recognised methodology for evaluating effects on the setting of historic assets, a framework that necessitates a careful evaluation of how changes to setting influence the contribution that setting makes to an asset's cultural significance. This methodology, developed through consultation with Historic Environment Scotland, explicitly distinguishes between mere visual change and adverse impact, emphasising that visual alterations alone should not be equated directly with harm.

Crucially, it requires an assessment of whether the integrity of the setting is adequately retained, ensuring that any conclusions drawn about heritage impacts rest on a rigorous evaluative process rather than descriptive observations.

However, a Methodological Audit prepared to support community objections, utilising only the applicant's Appendix 14.3, finds that although the operational assessment identifies relevant heritage attributes, it fails to demonstrate that the integrity of setting has been assessed in accordance with the applicant's own accepted methodology. The assessment's narrative focuses predominantly on visual factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation before concluding that the integrity of setting remains intact. This represents a critical omission, as the required evaluative step—linking these observations explicitly to the retention or loss of setting integrity—is absent in all the worked examples examined by the Audit. Consequently, the reliability of the applicant's conclusions about heritage impacts is fundamentally undermined.

While the applicant has made efforts to identify and mitigate impacts on heritage assets, their assessment appears to inadequately capture the full extent of the cultural landscape and experiential qualities that contribute to the significance of these sites. The applicant's own baseline acknowledges that the cultural importance of the affected heritage assets arises not only from isolated features but from a complex interplay of factors including pilgrimage routes, arrival by sea, and movement through a living cultural landscape. These elements encompass relationships between monuments, spirituality, and the surrounding landscape and seascape, which are experienced dynamically through movement rather than from fixed viewpoints. Moreover, Historic Environment Scotland, as recorded in the consultation responses within the application, specifically requested additional viewpoints to ensure that these broader cultural and experiential qualities are properly represented. This suggests that the current assessment does not fully address the heritage impacts in a manner consistent with the identified cultural significance, indicating a need for a more comprehensive evaluation that respects the intangible and processual attributes of the heritage assets in question.

The heritage impact conclusions presented in the application are fundamentally reliant on the findings of the accompanying landscape assessment. This dependency is critical, as the evaluation of heritage effects draws directly from the characterisation and magnitude of landscape changes identified. Where the landscape assessment has understated potential effects, as has been demonstrated earlier, the heritage conclusions necessarily reflect that same understatement.

Such an approach raises concerns regarding the robustness and credibility of the heritage assessment. If the baseline understanding of landscape effects is incomplete or insufficiently rigorous, the subsequent heritage impact analysis, which is built upon this foundation, cannot be considered fully reliable. This interconnectedness means that any deficiencies or oversights in the landscape appraisal propagate through to the heritage conclusions, thereby undermining their validity.

Accordingly, a reassessment that addresses the identified shortcomings in the landscape evaluation is essential to ensure that heritage impacts are accurately

characterised. Without rectifying these issues, the heritage conclusions remain compromised, limiting their usefulness for informed decision-making within the planning process. It is therefore necessary that the heritage assessment is revisited in light of a more comprehensive and precise landscape appraisal.

While mitigation measures are referenced in the application, they fall short when compared against the requirements of NPF4 Policy 7(h) concerning scheduled monuments, alongside Policies 7(c) and 7(d) addressing the setting of heritage assets, as well as GEN 6 and the guidance set out in paragraphs 4.22 to 4.23 of the National Marine Plan. Crucially, the applicant has not provided the necessary assessment demonstrating that the cultural significance of internationally and nationally important heritage assets and their settings will be preserved. Consequently, the Scottish Ministers lack the comprehensive evidence needed to conclude that these heritage assets would be adequately protected. This shortfall undermines the application's compliance with key policy obligations and casts doubt on its acceptability in terms of heritage conservation.

1.1.117 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development rely heavily on visitor numbers, with the latter drawn specifically by the very qualities the applicant's own baseline assessments identify: landscape, seascape, cultural heritage, tranquillity and remoteness. Any alteration to these attributes would directly undermine the fundamental economic base that sustains these communities. This dependency means that changes to the environment risk precipitating a decline not only in tourism revenue but also in essential local services and population stability.

Such a decline poses a serious threat to the long-term viability of these island settlements. The economic and social sustainability of the islands is intrinsically linked to the preservation of their unique visitor-attracted characteristics. Therefore, the proposal's impact on these key qualities must be given paramount consideration, as it jeopardises the continued existence and prosperity of the island communities themselves.

The applicant's socio-economic assessment fails to provide an adequate understanding of the impacts on island communities, particularly when compared to the detailed evaluation of port communities. While the assessment recognises habitability as a potentially significant pathway affecting island communities, no subsequent place-based analysis of the islands' habitability was undertaken. Instead, Chapter 18 confines its detailed scrutiny to regional and port community impacts, ultimately concluding that island communities exhibit low sensitivity to tourism-related effects. This inconsistent approach undermines the robustness of the assessment and weakens any mitigation strategies proposed for these vulnerable communities.

Island economies are distinctive and cannot be accurately represented by regional averages. Their economic structure is heavily concentrated in sectors that are directly reliant on the attributes attracting visitors, making them inherently more sensitive to any changes affecting those qualities. Indeed, dependence on increasing visitor numbers intensifies, rather than diminishes, their vulnerability. Therefore, the

applicant's conclusion of low sensitivity—arrived at without a proper place-specific analysis—is not supported by evidence but rests on an unfounded assumption. This methodological shortcoming calls into question the validity of the socio-economic assessment and the adequacy of proposed mitigations for the island communities concerned.

There remains significant uncertainty regarding the proposal's compliance with established policy and statutory duties concerning island communities. The requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan emphasise that decisions must be based on robust socio-economic evidence, applying a precautionary approach where such evidence is insufficient. Additionally, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 mandate that the interests of island communities are assessed thoroughly and afforded appropriate weight, with meaningful engagement from the earliest stages through to the final decision. This framework is designed to ensure that island communities, which often have distinct social and economic characteristics, are not overlooked or adversely impacted by development proposals.

However, the applicant has acknowledged the need for particular scrutiny of island communities but has failed to undertake the necessary assessment to understand the effects of the proposal on these communities. There is no demonstration that the proposal aligns with the principles of sustainable island communities, nor that the statutory duties towards these communities have been discharged. This lack of compliance with key policy and statutory requirements undermines confidence that the proposal can proceed without detrimental consequences to island communities. Accordingly, it is concluded that the application should not be approved in its current form, given its failure to meet the essential standards of assessment and protection for island communities.

1.1.118 Ecology, Biodiversity and Habitats Regulations

The proposed development would result in construction, operation, and decommissioning activities at a very large scale, persisting for decades within an area that includes Priority Marine Features and Annex I habitats. These ecologically sensitive sites are located not only within the development footprint but also extend into the surrounding waters, which are known to support important populations of seabirds, marine mammals, and basking sharks. Given the recognised ecological importance and vulnerability of these habitats and species, the proposal carries a significant risk of adverse environmental effects. This context necessitates a thorough assessment of potential impacts and careful consideration of mitigation measures to safeguard the integrity of these protected marine environments.

The 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.

Consent for developments that may affect protected habitats and species can only be lawfully granted if it is conclusively demonstrated that the proposal will not adversely affect the integrity of the designated site. This requirement, established under the Habitats Regulations, imposes a rigorous evidential standard: no reasonable scientific doubt can remain regarding the absence of adverse effects. Consequently, the applicant bears the full burden of proof to satisfy this high threshold.

This legal requirement is further reinforced by relevant planning policies, including GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). Together, these policies underscore the necessity for stringent assessment and caution in decision-making concerning developments impacting protected natural assets, ensuring that environmental safeguards are paramount.

It is important to note that mitigation strategies, compensation measures, or proposals for future monitoring cannot, in isolation, fulfill the statutory tests required under the Habitats Regulations. Only where these rigorous conditions are met without reasonable scientific doubt may consent be lawfully granted. This framework ensures that protection of habitats and species is not compromised by speculative or insufficiently evidenced development proposals.

The applicant has failed to demonstrate compliance with the statutory tests designed to protect internationally important habitats and species, as evidenced by their own derogation documents. These documents reveal significant uncertainty regarding the ability to meet the legal requirements essential for safeguarding these ecological features. Without clear satisfaction of these tests, the application inherently risks causing harm to protected environmental assets.

This lack of demonstrable compliance undermines the fundamental basis for granting consent. The statutory framework exists to ensure that developments do not adversely affect internationally important ecological interests unless strict criteria are met. The evidence before the decision-maker does not provide the necessary assurance that these criteria have been fulfilled, meaning the application falls short of the legal standards required for approval.

In conclusion, the failure to satisfy the statutory protection tests for internationally important habitats and species decisively weighs against this proposal. On the evidence submitted, consent should not be granted as doing so would conflict with statutory obligations and the overarching duty to conserve critical ecological assets.

1.1.119 Cumulative and In-Combination Effects

The current approach to assessing the proposed development is fundamentally flawed when compared to established principles of project evaluation and mitigation. Mitigation measures rely on a full understanding of the project's cumulative impacts, yet in this case, only a portion of the development—the wind farm itself—is before the Scottish Ministers. Critical components such as the export cable corridor and onshore transmission works, without which the wind farm cannot operate, are deferred to separate, subsequent applications. This piecemeal consideration prevents a holistic appraisal of the project's overall effects and undermines the ability to implement effective and comprehensive mitigation strategies.

This fragmented assessment approach runs counter to the legal precedent set in Raeshaw Farms, which affirms that projects must be evaluated in their entirety rather than being artificially divided into smaller parts whose individual impacts appear less significant. By deferring key elements to later consenting processes, the decision-making body is unable to consider the full scope of environmental and other impacts at the principal decision stage. Consequently, the assessment is incomplete and procedurally unsound, as it denies a proper cumulative evaluation and impairs informed decision-making on the project as a whole.

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

The applicant’s approach to mitigating environmental impacts is insufficient when compared against the requirements set out in GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the EIA Regulations concerning

project splitting. Specifically, there has been a failure to reliably identify and assess the cumulative and in-combination effects of the proposal, including the overall effects of the project as a whole. This omission undermines compliance with both planning policies and environmental regulations. It is therefore essential that the decision-making process explicitly addresses the treatment of deferred works to ensure a comprehensive evaluation of all potential impacts.

1.1.120 Public Engagement, Site Selection and Environmental Information

The applicant invites Scottish Ministers to attribute significant weight to the site-selection process; however, this process has been fundamentally compromised by deficiencies in public participation. The consultation accompanying the application encompasses many thousands of pages of highly technical material, yet the consultation period coincided with the busiest months for island communities. During this peak visitor season, residents are engaged in continuous work, and access to specialist advice is severely limited. In stark contrast, the applicant has benefited from years of preparation supported by substantial professional and financial resources. This imbalance has effectively restricted the capacity of the affected communities to engage meaningfully with the proposals.

National policy and international principles underscore the necessity for effective public participation in decisions of such magnitude. GEN 18 of the National Marine Plan, alongside the Aarhus Convention's requirements, mandates that those impacted must have a realistic and fair opportunity to contribute to the decision-making process. The conditions under which the local communities have been expected to respond fall short of this standard, undermining the legitimacy of the consultation. It is therefore imperative that Ministers recognise these shortcomings in participation when considering the representations submitted, as the quality and timing of public engagement bear directly on the integrity of the entire site-selection process.

The Environmental Impact Assessment (EIA) submitted with this application is fundamentally insufficient to enable the Scottish Ministers to make an informed decision. While the EIA represents the principal evidential basis for determination, the critical issue is not its extent but its adequacy. The assessment identifies potential significant effects across various topics yet fails to investigate these fully or relies on methodologies that do not substantiate its conclusions. For instance, the landscape assessment produces outcomes based on a distance pattern that its own methodology does not support; the heritage assessment lacks evidence of applying its own stated integrity test; and the socio-economic assessment omits any place-based analysis of the affected islands, undermining its relevance and comprehensiveness.

Moreover, the application defers key evaluations to future stages through post-consent plans, monitoring, and additional approvals. Such reliance does not comply with the Environmental Impact Assessment Regulations, which require likely significant effects to be understood prior to determination. The Scottish Ministers are obliged to base their decision solely on the evidence presented at this stage, not on assumptions that outstanding issues will be resolved satisfactorily later. On this

basis, the applicant has not demonstrated that the environmental information submitted meets the required standard of adequacy.

1.1.121 Effects on Local Area

The proposed development area encompasses 448 square kilometres immediately northwest of Islay and west of Colonsay, placing these islands—and the neighbouring island of Oronsay—within direct and substantial proximity to the project. Despite this, the applicant's assessment inadequately addresses the significant effects on these communities, particularly by considering Islay primarily as a potential project location rather than evaluating its status as an affected island community in its own right. The Atlantic-facing communities of Islay, which face the nearest edge of the development area, receive no place-based assessment of the impacts on their local setting, economy, or community life. For Colonsay and Oronsay, the situation is equally concerning. The seaward outlook that shapes daily life on these islands directly faces the development array, with the North Colonsay and Western Cliffs Special Protection Area—part of Colonsay's own coastline—subject to the applicant's derogation case and compensation plan. This represents a clear admission that harm to the internationally protected seabird population of these cliffs cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance situated within this community's area, is inadequately considered, with the same identified gaps in the heritage assessment applying fully to the treatment of its open maritime setting. Taken together, these factors demonstrate a fundamental underassessment of the direct and significant effects on Islay, Colonsay, and Oronsay, undermining the reliability of the environmental and heritage impact evaluation presented.

The applicant's Coastal Character assessment recognises the Sound of Iona as an area of high sensitivity, noting its direct orientation towards the development site and extensive visibility across a large geographical extent. The assessment concludes a moderate and significant overall effect, spanning approximately 21 kilometres, with turbines visible across about 39 degrees of the horizon. Similarly, the West Coast of Iona is identified as highly sensitive with widespread visibility, and the applicant acknowledges significant effects on residents and visitors throughout much of the island, including at Dùn Ì, Iona's highest point.

Iona's monastic landscape, encompassing the Abbey, the Nunnery, and the high crosses, holds heritage of international importance, with significance closely tied to pilgrimage, arrival by sea, and movement through the landscape, as established in the applicant's baseline. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself; however, no visualisation has been provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, limiting the completeness of the heritage impact assessment.

Community response further underscores the scale of concern, with a household consultation revealing that 92 per cent of respondents on Iona object to the proposal. Despite habitability being identified by the applicant's consultants as a potential pathway of effect on the local community, this has not been assessed. The perceived scale of the development's visual impact can be contextualised by comparing the turbines with the familiar landmark of Ben Hynish on Tiree, which

stands at 141 metres and is visible from Iona at approximately 33 kilometres; the largest turbines would exceed Ben Hynish's height by around 194 metres at roughly two-thirds of that distance. These points collectively indicate that the applicant's assessment may underestimate the true scale and significance of visual, community, and heritage impacts on Iona.

The applicant's assessment fails to adequately recognise the practical consequences of the proposed development on the coastal communities and landscapes of Mull and the Ross of Mull. Notably, Fionnphort—serving as the gateway to Iona and the embarkation point for visitors—is acknowledged by the applicant as being significantly affected. This community relies heavily on the flow of tourists, and any adverse visual or experiential impact here would have immediate economic repercussions. Similarly, significant effects are accepted at Erraid and along the Core Paths of the Ross, areas integral to both local identity and visitor experience, yet these impacts are not fully explored in terms of their wider community implications.

Across the island of Mull, the applicant concedes significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is categorised as having high sensitivity at distances of approximately 21 to 33 kilometres. Despite this, the applicant attributes only a medium magnitude of effect, which understates the true visual and environmental impact on this nationally designated landscape. This approach neglects the cumulative significance that such visual intrusions would have in a context recognised for its natural beauty and recreational importance.

Moreover, the assessment's treatment of the Wilderness and Gribun Rocks coastal area exemplifies an overreliance on distance-based reasoning. The applicant dismisses potential effects on this area—where viewing distances exceed 30 kilometres—by classifying the scale of change as small. This simplification ignores the fact that Mull's west-facing tourism economy, including wildlife boat operations and accommodation providers in its western townships, depends fundamentally on the integrity of the Atlantic seascape. The industrialisation of this seascape by the proposed development would harm these communities, none of which have received a place-based assessment to address their specific vulnerabilities. Taken together, these shortcomings indicate that the applicant's evaluation does not sufficiently account for the significant visual, economic, and community impacts on Mull and the Ross of Mull.

The applicant's assessment fails to adequately recognise significant impacts on important designated landscapes and vulnerable island communities, thereby undermining the protection of their natural and cultural qualities. Ulva, situated within the Loch na Keal National Scenic Area, is a community-owned island undergoing regeneration. This small, re-establishing community relies fundamentally on the unspoilt seascape and setting that the development threatens, yet no specific assessment of effects on Ulva has been undertaken. Similarly, Staffa, also within the Loch na Keal National Scenic Area and renowned across Europe, lies approximately 35 kilometres from the development. Despite NatureScot's recommendation to assess effects up to 30 kilometres, the applicant dismisses the impact on Staffa as

small and not significant, even though their own analysis acknowledges its panoramic maritime qualities. The Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed at a High sensitivity level from 28 to 32 kilometres distance but is attributed only Medium to Low magnitude effects due to distance and retained landforms, a conclusion that appears to downplay the importance of its defining characteristics. The Scarba, Lunga and the Garvellachs National Scenic Area, located between 35 and 40 kilometres away, is treated similarly. Collectively, these assessments underestimate or omit meaningful effects on designated landscapes and island communities, risking harm to their essential qualities and the viability of fragile local populations.

The applicant's assessment underestimates the impact on Tiree by attributing a Low magnitude of change to an area of High sensitivity, namely the South Tiree coastal zone at approximately 35 kilometres distance. This is a practical concern because Tiree's landscape character is uniquely defined by its flat, low-lying topography and the expansive dominance of sea and sky. With its highest point, Ben Hynish, reaching only 141 metres, the introduction of turbines up to 335 metres tall would represent unprecedented vertical elements in the island's seascape. Given this exposure and sensitivity, the conclusion of Low magnitude fails to capture the true scale of visual and character impacts, resulting in an unreliable evaluation of effects.

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.

There remains significant uncertainty regarding the applicant's approach to assessing impacts beyond 20 kilometres, which systematically moderates the magnitude of change and discounts effects on highly sensitive receptors at these distances. Taken together, the evidence demonstrates that where sensitive communities exist beyond this threshold, their experiences and the true extent of environmental effects have not been adequately evaluated through any place-based assessment. This methodological limitation fundamentally undermines the integrity and completeness of the environmental impact assessment, leaving a critical gap in understanding the full implications of the proposal.

1.1.122 Personal Observations

In addition to the planning matters above, I am personally concerned because: This would have devastating effects on the islands

1.1.123 Summary

The proposal for the MachairWind Offshore Wind Farm fails to meet the necessary statutory and policy requirements essential for its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along the coast. However, published analyses of the applicant's documentation reveal that these impacts have been underestimated, and crucially, the required heritage assessment has not been completed. Moreover, while the effects on the island communities affected by the proposal were identified, no formal assessment of these impacts has been undertaken. The ecological criteria necessary to satisfy planning tests have not been demonstrated as achievable. It is also pertinent to note that only a portion of the project is currently before the Scottish Ministers for consideration.

Given these shortcomings, it is respectfully submitted that Scottish Ministers should refuse consent for the MachairWind Offshore Wind Farm and decline the associated marine licence. In the event that Ministers do not intend to refuse the applications outright, it is requested that they require the submission of additional environmental information and enhanced visualisations. Furthermore, the determination of the applications should be deferred until after a public inquiry is conducted, allowing for a thorough examination of the concerns raised in this objection.

Finally, irrespective of the outcome, it is urged that the Scottish Ministers provide explicit conclusions in their decision statement regarding the effects of the proposal on cultural heritage and the impacted island communities.

Yours faithfully,

[Redacted]

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

Member of the public 514
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, referenced by applications 00012385 and 00012386. These relate respectively to consent sought under section 36 of the Electricity Act 1989 and a marine licence application pursuant to Part 4 of the Marine (Scotland) Act 2010, both submitted by MachairWind Limited, trading as ScottishPower Renewables. I request that this objection be officially recorded and that I be informed of the final determination in these matters.

The proposals envisage the construction of an offshore wind farm with a generating capacity of approximately 2 gigawatts. This development would comprise between 91 and 144 wind turbines, each with a maximum blade tip height of up to 335 metres. The designated Windfarm Development Area encompasses around 448 square kilometres of marine space situated to the north-west of Islay and west of Colonsay. The site lies approximately 21 kilometres from the island of Iona and is in close proximity to various islands and coastal communities within the southern Hebrides.

The following sections detail the grounds for objection, framed in the context of the statutory and policy criteria governing the determination of these applications. It is essential to emphasise that the responsibility lies with the applicant to provide sufficient evidence demonstrating compliance with all relevant planning and environmental tests. Objectors are not obliged to establish the contrary. In this instance, the applicant has failed to meet this evidentiary burden, and accordingly, the applications should be refused consent.

1.1.124 Seascape, Landscape and Visual Effects

The applicant’s assessment methodology fails to specify any distance threshold beyond which major effects are considered to cease. Nevertheless, analysis of the applicant’s Chapter 16 and Appendices 16.1 to 16.3 reveals a clear pattern: no highly sensitive receptor situated more than approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of the receptor’s sensitivity or the extent of visibility. This indicates a de facto limitation embedded within the assessment, constraining the recognition of significant impacts to receptors within this 20-kilometre radius.

Further scrutiny of the applicant’s own documents confirms the influence of distance on the assessment outcomes. For instance, a coastal area located over 30 kilometres from the development is judged to experience only a small scale of change due to viewing distance. Similarly, the Landscape Character synthesis categorises impact magnitude as High within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. This systematic moderation of magnitude precisely at distances where the most sensitive designated landscapes are found results in protective tests being applied to understated inputs. Consequently, the conclusions presented do not provide a reliable description of the effects for which Scottish Ministers are being asked to grant consent.

The proposal fails to comply with key planning policies designed to safeguard landscape and seascape interests. Specifically, the effects identified engage the provisions set out in NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively establish clear requirements for the protection of nationally important landscapes and seascapes, which the proposal does not adequately address.

Furthermore, the applicant has not demonstrated that its conclusions regarding the scale of the acknowledged effects align with the methodology it has employed. This lack of consistency raises serious doubts about the reliability of the assessment and undermines confidence in the proposal's claimed compliance with the relevant policy framework. Without robust evidence that the methodology has been correctly applied, the assessment cannot be considered sufficiently rigorous.

In light of these points, the proposal does not meet the necessary requirements of the planning policies protecting nationally significant landscape and seascape assets. Consequently, it should not be supported as it stands, given the clear shortcomings in demonstrating policy compliance and the potential for unacceptable adverse effects on protected environmental interests.

1.1.125 Cultural Landscape, Archaeology and Historic Environment

The assessment presented by the applicant does not fully adhere to the required methodology for evaluating effects on the setting of historic assets, thereby calling into question the reliability of its conclusions regarding heritage impacts. While the applicant utilises Historic Environment Scotland's established methodology—which rightly emphasises the need to evaluate whether changes to setting affect its contribution to cultural significance and whether the integrity of that setting is retained—the assessment departs from these principles in practice. The methodology expressly clarifies that visual change alone should not be equated with adverse impact.

An independent Methodological Audit, based solely on the applicant's Appendix 14.3, demonstrates that although the operational assessment identifies relevant heritage attributes, it fails to show how the integrity of setting has been evaluated as required by the methodology. Instead, the assessment focuses on describing aspects such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, before concluding that the integrity of setting remains adequate. Crucially, the essential evaluative step demanded by the methodology is absent from all examples examined, undermining confidence in the applicant's conclusions.

The practical consequence of the applicant's assessment is that it risks underrepresenting the full cultural significance of the heritage assets affected. The applicant's own baseline acknowledges that this significance arises not only from isolated monuments but from experiential qualities such as pilgrimage routes, arrival by sea, and movement through a living cultural landscape. These qualities encompass the relationships between monuments, spirituality, and the surrounding landscape and seascape, which are appreciated through dynamic movement rather than static viewpoints. Historic Environment Scotland's consultation responses, as

recorded in the application, further highlight this concern by requesting additional viewpoints to ensure that these broader cultural and experiential qualities are adequately represented. Without addressing these wider aspects, the assessment may fail to capture the heritage assets' true baseline qualities, leading to an incomplete understanding of potential impacts.

The practical consequence of relying on an understated landscape assessment is that the subsequent heritage impact conclusions lack credibility. If the landscape effects are minimised, as previously demonstrated, then any heritage assessments that depend on these landscape findings will inevitably reflect the same level of understatement.

This interdependence means that deficiencies in the landscape evaluation directly undermine the robustness of heritage conclusions. Without an accurate and comprehensive landscape assessment, the heritage impact analysis cannot be considered reliable, thereby weakening the overall planning justification.

The application engages NPF4 Policy 7(h) concerning scheduled monuments, alongside Policies 7(c) and 7(d) relating to the setting of heritage assets, as well as GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. These policies collectively establish a robust framework for the protection of cultural heritage, emphasising the need to safeguard the significance and context of internationally and nationally important heritage assets.

However, the applicant has not provided evidence demonstrating that the cultural significance of these heritage assets and their settings will be adequately protected. Crucially, the Scottish Ministers do not have before them the necessary assessment that would support such a conclusion. This omission indicates a failure to meet key policy requirements, thereby undermining the acceptability of the application in respect of heritage asset protection.

1.1.126 Effects on Island Communities, Tourism and the Local Economy

There is considerable uncertainty regarding the potential impacts of the proposed development on the island communities in question, particularly given their unique economic and social contexts. These communities rely heavily on a visitor economy that is intimately connected to specific environmental and cultural qualities. The applicant’s own baseline assessments identify these attributes as landscape, seascape, cultural heritage, tranquillity and remoteness. Any alteration to these qualities, therefore, poses a substantial risk to the fundamental appeal that attracts visitors to the islands.

The significance of these qualities extends beyond mere aesthetics; they form the cornerstone of the local economy. The island communities depend to an exceptional degree on visitors drawn by these distinctive features. If the proposal were to diminish the integrity or experience of these characteristics, the resulting effect would be a direct strike at the economic base of these communities. This, in turn, threatens not only business viability but also the maintenance of essential local services, population retention and the long-term sustainability of community life.

Given the centrality of the visitor-attracted qualities to both economic and social sustainability, any development that risks impacting them must be subject to rigorous scrutiny. The evidence indicates a clear and direct link between these qualities and the ongoing viability of the island communities. Accordingly, the potential for adverse effects should weigh heavily in the consideration of the proposal, underscoring the need for a cautious and comprehensive assessment before any approval is granted.

The practical consequence of the applicant's inadequate assessment methodology is a significant risk that the specific impacts on island communities will be neither properly understood nor effectively mitigated. Although the applicant's own consultants identified habitability as a potentially significant pathway through which the proposal could affect these communities, no subsequent assessment of habitability was undertaken for the affected islands. Instead, the socio-economic assessment presented in Chapter 18 focuses primarily on regional analysis, providing detailed consideration of potential port communities but failing to undertake an equivalent place-based assessment of the island communities directly facing the development. Despite this omission, the assessment nonetheless concludes that these island communities exhibit low sensitivity to tourism effects, a finding that lacks empirical grounding.

This conclusion overlooks the distinctive economic characteristics of small island communities, which cannot be accurately represented by regional averages. Island economies tend to be heavily concentrated in sectors that are particularly vulnerable to changes in the qualities that attract visitors. Rather than reducing sensitivity, a dependence on increasing visitor numbers heightens the community's vulnerability by deepening reliance on those qualities at risk. Without a place-based analysis, the claim of low sensitivity is not supported by evidence but instead rests on an unsubstantiated assumption. This methodological flaw undermines confidence in the assessment's findings and calls into question the adequacy of any proposed measures to address potential adverse socio-economic impacts on island communities.

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

Moreover, the applicant has acknowledged that island communities warrant particular scrutiny but has failed to conduct the necessary assessment to understand the potential effects on these communities. There is no demonstrated evidence that the proposal is compatible with the principles of sustainable island communities, nor that the statutory duties owed to these communities have been adequately discharged. Given this shortfall, it is clear that the proposal does not meet the

required standards for assessing and protecting island communities as mandated by current policy and legislation. Consequently, the proposal should not be approved in its current form.

1.1.127 Ecology, Biodiversity and Habitats Regulations

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

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

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

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically aimed at addressing potential impacts on the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are typically prepared in circumstances where an adverse effect on the integrity of the protected site cannot be conclusively ruled out. Their inclusion in the application is therefore a significant matter, reflecting the applicant’s recognition of the sensitivity of the site and the potential for environmental harm.

Notably, the submission of these documents indicates that the applicant acknowledges the possibility that the Scottish Ministers may reach a different conclusion regarding the likelihood of adverse effects on the protected site’s integrity. By proactively providing derogation and compensation proposals, the applicant intends to address such concerns should they arise during the determination process. This approach demonstrates a degree of responsibility in seeking to mitigate potential impacts on a designated conservation area, although it also underscores the inherent uncertainties associated with the assessment of such effects.

Mitigation, compensation proposals, and future monitoring measures, while important components of development planning, do not alone satisfy the stringent statutory tests required under the Habitats Regulations. The competent authority must be assured beyond reasonable scientific doubt that the proposal will not adversely affect the integrity of the protected site before consent can be lawfully granted. This high evidential threshold places the onus squarely on the applicant to demonstrate compliance, rather than relying solely on proposed mitigation or compensation strategies.

This legal framework is reinforced by relevant policy provisions, including GEN 9 and GEN 13 of the National Marine Plan, alongside Policies 3, 4(b), 4(e), and 4(f) of NPF4. Together, these establish a comprehensive and rigorous approach to safeguarding protected habitats and species, ensuring that any development proposals undergo robust assessment consistent with the Habitats Regulations. Consequently, planning consent must be withheld unless these exacting requirements are fully met.

The applicant's submission fails to demonstrate compliance with the statutory tests intended to protect internationally important habitats and species, as evidenced by their own derogation documents. These documents reveal a lack of sufficient certainty that the legal requirements can be met, which is critical when considering the potential impacts on such ecological features.

Given this insufficiency, the case for granting consent is fundamentally undermined. Without clear assurance that the statutory protections will be satisfied, the proposal cannot be deemed legally compliant or environmentally responsible. Consequently, the application should not be approved in its current form.

1.1.128 Cumulative and In-Combination Effects

The current proposal presents only a partial element of the overall project, specifically excluding the export cable corridor and the onshore transmission works which are essential for the operation of the wind farm. These critical components are deferred to later applications, resulting in a fragmented assessment process. Consequently, the full range of environmental and operational impacts cannot be evaluated together at this stage. This fragmentation leads to a situation where significant aspects of the project's effects will be determined through separate consenting processes after the principal decision has already been made.

Such an approach is inconsistent with established legal principles, as reaffirmed by the courts in Raeshaw Farms, which mandate that a project must be assessed in its entirety rather than being divided into smaller parts to minimise the apparent individual impacts. By salami-slicing the project, the assessment fails to provide a comprehensive understanding of its cumulative effects, undermining the integrity of the decision-making process. Therefore, the current assessment methodology is both legally and procedurally flawed, and cannot constitute a sound basis for granting consent.

The proposed cumulative impact assessment fails to provide a reliable evaluation, as it relies on baseline assessments that understate the true effects. Specifically, the Environmental Impact Assessment's underlying evaluations of landscape, heritage, and socio-economic factors have already minimized the extent of adverse impacts. Consequently, the cumulative assessment, which is based on these same understated baselines, inevitably underestimates the combined effects of this development alongside other existing, consented, and foreseeable projects. This systemic flaw compromises the accuracy of the overall cumulative impact conclusions, rendering them insufficient for informed decision-making.

The applicant's submission fails to meet the requirements set out in GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the Environmental Impact Assessment (EIA) Regulations regarding project splitting and the assessment of cumulative effects. Unlike a comprehensive assessment approach, which would integrate all elements of a project to fully appraise environmental impacts, the current proposal does not adequately consider the combined and in-combination effects of the development. This omission undermines the ability to evaluate the overall environmental consequences accurately and limits the effectiveness of any proposed mitigation measures.

Furthermore, the applicant has not explicitly addressed the implications of deferred works within the project scope, which is a critical factor in understanding the full extent of environmental impacts. The decision-making process requires clear and transparent consideration of these deferred elements to ensure compliance with relevant policies and regulations. Without this explicit treatment, there is a significant risk that the cumulative impacts remain underestimated, leading to an incomplete assessment that could result in adverse environmental consequences going unmitigated. It is therefore requested that the deferred works be expressly addressed and integrated within the determination to uphold policy compliance and environmental protection standards.

1.1.129 Public Engagement, Site Selection and Environmental Information

The applicant requests that Scottish Ministers place significant weight on the site-selection process, thereby rendering the quality of public participation in that process directly relevant. However, deficiencies in public involvement at both the plan and site-selection stages have persisted into the application phase. The application itself comprises many thousands of pages of technical material, yet the consultation period coincided with the busiest months for island communities, when residents are engaged continuously throughout the visitor season and specialist advice is least accessible. In contrast, the applicant has had years and substantial professional and financial resources to prepare its case.

GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, mandates that those affected by decisions of this magnitude must have a realistic opportunity to participate. The conditions under which the affected communities have been required to respond do not meet this standard. It is therefore essential that Ministers take this shortfall firmly into account when considering the representations made, as the legitimacy of the site-selection process is undermined by these deficiencies in consultation timing and public participation.

The practical consequence of the deficiencies identified in the Environmental Impact Assessment (EIA) is that the Scottish Ministers are unable to make a fully informed decision on this application. The EIA is the principal evidential basis for determination, and it is not a question of its extensiveness but rather its sufficiency. Across multiple topic areas, the application acknowledges pathways to significant effects yet fails to investigate them thoroughly. For instance, the landscape assessment derives outcomes based on a distance pattern that its own stated methodology does not support. Similarly, the heritage assessment does not

adequately demonstrate the application of its own integrity test, and the socio-economic assessment lacks any place-based analysis pertinent to the affected islands. Furthermore, reliance on future assessments, post-consent plans, ongoing monitoring, and additional approvals cannot substitute for the requirement under the EIA Regulations that likely significant effects be fully understood prior to determination. The Scottish Ministers must base their decision on the evidence currently before them, rather than on assumptions that unresolved matters will be satisfactorily addressed at a later stage. In light of these shortcomings, the applicant has not demonstrated that the environmental information submitted meets the necessary standard of adequacy for determination purposes.

1.1.130 Effects on Local Area

The applicant's assessment fails to adequately consider the direct and significant effects on the communities of Islay, Colonsay, and Oronsay, leading to an unreliable evaluation of environmental and heritage impacts. Although the development area lies immediately north-west of Islay and west of Colonsay, the application treats Islay primarily as a potential project location rather than recognising it as an affected island community. This approach overlooks the Atlantic-facing communities that border the nearest edge of the 448 square kilometre development area and neglects any place-based analysis of how the development would affect their setting, local economy, or community life.

For Colonsay and Oronsay, the situation is similarly concerning. The daily lives of these communities are defined by their seaward outlook, which faces the development area directly. Moreover, the North Colonsay and Western Cliffs Special Protection Area, located along Colonsay's own coastline, is central to the applicant's derogation case and compensation plan. This area's inclusion highlights the acknowledged risk of harm to the internationally protected seabird population, which the application admits cannot be ruled out. Such potential ecological damage further underscores the insufficiency of the assessment.

The heritage implications are equally significant. Oronsay Priory, a scheduled monument of national importance, lies within this community's area and is intimately connected to its open maritime setting. The previously identified shortcomings in the heritage assessment apply fully to the treatment of this monument's setting. Taken together, these deficiencies demonstrate that the applicant's evaluation underestimates the effects on local communities, economy, and heritage, thereby undermining the credibility of the overall environmental and heritage impact assessment.

The applicant's assessment significantly underestimates the scale and importance of visual, community, and heritage impacts on Iona, thereby compromising the overall accuracy of the environmental and social impact evaluation. The Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity, directly facing the development site, with extensive visibility and a large geographical extent of change spanning approximately 21 kilometres. The proposed turbines would extend across around 39 degrees of the horizon, affecting key views including the ferry crossing between Fionnphort and Iona. Similarly, the West Coast of Iona is acknowledged as highly sensitive with widespread visibility, where the applicant

concedes significant effects for residents and visitors, including those at Dùn Ì, the island's highest point. Importantly, Iona's monastic landscape—comprising the Abbey, the Nunnery, and the high crosses—holds international heritage significance, closely tied to pilgrimage and maritime arrival. Despite Historic Environment Scotland's request for additional viewpoints, including from the ferry crossing itself, no visualisation is provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, leaving a critical gap in the assessment. Community concerns further underscore the impact; a household consultation revealed that 92 per cent of respondents on Iona object to the proposal, yet the applicant's own consultants identified habitability as a potential effect pathway that remains unassessed. To contextualise the scale, the largest proposed turbines would exceed the height of Ben Hynish on Tiree by approximately 194 metres, appearing substantially larger despite being at roughly two-thirds of the distance from Iona. These factors collectively demonstrate that the applicant's evaluation does not fully capture the significant and wide-ranging effects on Iona, undermining the robustness of the environmental and social impact conclusions.

While the applicant acknowledges significant effects on certain areas and communities within Mull and Ross of Mull, such as Erraid, the Core Paths of the Ross, and Fionnphort—the latter being a critical gateway for visitors to Iona—their assessment relies heavily on distance-based mitigation assumptions that warrant closer scrutiny. For example, the Ross of Mull South coastal area is rightly identified as having High sensitivity at distances of approximately 22 to 24 kilometres, with effects attributed as Medium magnitude. However, the applicant's acceptance of significant effects in these zones contrasts with the treatment of more distant areas such as the Wilderness and Gribun Rocks coastal area, where, despite the High sensitivity classification of the Loch na Keal National Scenic Area (spanning 21 to 33 kilometres), the magnitude of effect is judged to be no more than Medium. This approach underplays the cumulative and perceptual impacts on the wider landscape.

Moreover, the applicant's assessment omits place-based analysis for communities that rely heavily on the unspoiled Atlantic seascape, including those dependent on the west-facing tourism economy, wildlife boat operations, and accommodation services in the western townships of Mull. The proposed development's industrialisation of this seascape threatens to undermine the natural qualities upon which these communities depend, yet they are not explicitly evaluated within the assessment. The reliance on viewing distance as a primary determinant of impact magnitude fails to capture the nuanced economic and social dependencies tied to these landscapes and seascapes.

In conclusion, while some mitigation is acknowledged by the applicant, the assessment inadequately addresses the significant visual, economic, and community impacts on Mull and Ross of Mull's designated landscapes and tourism-dependent communities. The approach, focused on distance-based reasoning, does not sufficiently reflect the sensitivities or the interlinked nature of these coastal environments and their associated human activities.

The applicant's assessment acknowledges the effects on designated landscapes within the Loch na Keal National Scenic Area, including Ulva, Staffa, Jura, and the Scarba, Lunga and Garvellachs National Scenic Area, but this evaluation

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

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

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

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

The applicant's assessment fails to consider significant effects on mainland and island communities that have direct views of, and economic reliance upon, the seascape in question, thereby undermining the overall comprehensiveness of the evaluation. For instance, the island of Gigha, which holds national significance as a community-owned island symbolising island regeneration, faces the development

waters from the east. The assessment neglects to examine how such effects could disrupt Gigha's finely balanced community and economy. Similarly, Ardnamurchan Point—the westernmost point of the British mainland—offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas represent precisely the type of receptor that the applicant's distance-based moderation approach discounts, which is inappropriate given their sensitivity and economic importance. Furthermore, the west coast of Kintyre comprises a chain of communities whose outlook, character, and visitor economy are intimately tied to the open Atlantic seaboard that looks toward Islay, Jura, and the surrounding waters. The Treshnish Isles and other small islands and mainland coasts sharing views toward the development site are similarly affected but remain unassessed. In sum, the omission of these receptors from the applicant's assessment results in a material gap that compromises its reliability and completeness, warranting further detailed consideration before any approval is granted.

The applicant's environmental impact assessment employs a distance-based methodology which systematically moderates and discounts the magnitude of change experienced by highly sensitive receptors located beyond approximately 20 kilometres from the development site. This approach is evidenced by the observation that where such receptors exist beyond this distance threshold, the assessment reduces the perceived effect magnitude and correspondingly lowers the significance attributed to those effects. Consequently, communities residing in these more distant locations have not been subjected to any place-based assessment, resulting in a lack of detailed consideration of their specific environmental sensitivities and the actual impacts they endure.

This systematic underestimation and discounting of effects beyond 20 kilometres undermines the integrity of the environmental impact assessment as a whole. By applying a generalized distance criterion rather than a nuanced, receptor-specific evaluation, the assessment fails to adequately capture the true extent and significance of environmental effects on sensitive communities outside the immediate vicinity. This methodological limitation not only diminishes the weight given to distant receptors but also neglects the lived experience of those communities, thereby compromising the comprehensiveness and robustness of the environmental appraisal. Such a practice calls into question the reliability of the conclusions drawn and indicates a need for a more rigorous, place-based assessment that fully accounts for effects irrespective of distance.

1.1.131 Personal Observations

In addition to the planning matters above, I am personally concerned because: I holiday every year on the west coast. What I love about it is the beautiful views the lack of industrial world. Knowing the disruption the surveying coring of the seabed causes before construction even begins. The turbulence caused by the seabed tethers destroys sea life habitats. I thought the government was intent on declaring a marine protection zone in that area which seems to be laughable if a few Miles away they allow this development

1.1.132 Summary

The proposal for the MachairWind Offshore Wind Farm fails to meet the statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges substantial impacts on nationally designated landscapes as well as on the heritage and communities along this coastal region. Further scrutiny of the applicant's published documents reveals that these impacts have been understated, with a necessary heritage assessment notably absent. Moreover, while the effects on the island communities affected by the development were identified, no formal assessment of these impacts has been undertaken. Ecological criteria essential to the project's approval have not been demonstrated as achievable, and it must be noted that only a portion of the entire project is currently subject to consideration by the Scottish Ministers.

In light of these shortcomings, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to deny the corresponding marine licence. Should the Ministers be inclined to grant consent, I request that they mandate the submission of additional environmental information and enhanced visual representations. Furthermore, I recommend that the determination of the applications be deferred until after a public inquiry, thereby allowing for a thorough examination of the concerns raised in this objection.

Irrespective of the final decision, I also ask that the Scottish Ministers explicitly address and document their conclusions regarding the development's impact on cultural heritage and the affected island communities within their reasons for decision.

Yours faithfully,

[Redacted]

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

Member of the public 515
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, as set out in application 00012385 seeking consent under section 36 of the Electricity Act 1989, and application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications, tabled by MachairWind Limited (ScottishPower Renewables), must include my details as an objector, and I request to be informed of the ultimate decision regarding these proposals.

The project under consideration encompasses an offshore wind farm with a generating capacity around 2 gigawatts, envisaging between 91 and 144 turbines. Each turbine may reach a maximum height of 335 metres to blade tip. The development is proposed within a designated Windfarm Development Area spanning roughly 448 square kilometres of marine space located north-west of Islay and west of Colonsay, situated approximately 21 kilometres from Iona and in proximity to the southern Hebridean islands and their adjacent coastal communities.

My objection is grounded firmly in both planning and environmental considerations, assessed against the relevant statutory and policy frameworks governing such applications. It is important to emphasise that the applicant bears the onus of proof to demonstrate, with adequate and compelling evidence, that all requisite tests and criteria are met. Objectors are not obliged to establish contrary evidence. Upon careful examination, the applicant has failed to meet this evidential threshold. Consequently, the applications should be refused consent.

1.1.133 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989, which explicitly require the applicant to have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, as well as protecting sites, buildings, and objects of architectural, historic, or archaeological interest. The evidence before the determining authority does not establish that the applicant has adequately considered these critical factors, nor does it show that reasonable steps have been taken to mitigate adverse effects arising from the proposal on these protected interests. This omission represents a fundamental deficiency in the application’s assessment and undermines the statutory framework designed to safeguard these environmental and heritage assets.

Furthermore, the Scottish Ministers, in their determination of this application, are mandated by the same statutory duties to have regard to these preservation and conservation requirements. The absence of demonstrated compliance, coupled with the identified deficiencies and omissions in the applicant’s submission, constitutes a clear conflict with the applicable legal and policy framework. Such shortcomings must weigh decisively against the granting of consent, as the statutory regime prioritises the protection of natural and cultural heritage interests which this application fails to adequately address.

The marine licence application under consideration fails to demonstrate compliance with the statutory requirements set out in Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland's National Marine Plan. The application does not adequately address the General Policies critical to its determination, including GEN 4 on Co-existence, GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 and paragraph 4.85 on Cumulative Impacts. These policies collectively form the statutory framework against which the application must be assessed, and the absence of demonstrated compliance is a fundamental deficiency.

The evidence provided within the application is insufficient to establish that the proposal meets the requirements of these policies. There are clear omissions and deficiencies in the assessment of impacts on the historic environment and natural heritage, as well as inadequate consideration of cumulative impacts and engagement processes. The lack of sound evidence to support the application's claims further undermines its validity. This failure to comply with the National Marine Plan's General Policies is not a minor procedural oversight but a substantive shortcoming that directly conflicts with the legal and policy framework governing marine licence determinations.

Given these unresolved deficiencies and the absence of demonstrated compliance, the application cannot be considered consistent with the statutory requirements of the Marine (Scotland) Act 2010 and the National Marine Plan. As established, where compliance has not been demonstrated or where evidence identifies conflicts with the applicable legal and policy framework, these matters weigh decisively against the granting of consent. Therefore, the marine licence application should be refused on the grounds that it does not satisfy the necessary statutory and policy criteria.

The proposal fails to demonstrate compliance with the key policies of National Planning Framework 4 (NPF4), notably Policies 3, 4, 7, and 11, which address biodiversity, natural places, historic assets, and energy respectively. NPF4 is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. The submitted evidence does not adequately show that the proposal meets these policy requirements, and there are clear deficiencies and omissions in the application's approach to these critical areas.

Specifically, the proposal does not provide sufficient evidence to confirm that it will protect or enhance biodiversity as required by Policy 3, nor does it adequately address the conservation of natural places under Policy 4. Furthermore, the impact on historic assets and places, governed by Policy 7, has not been satisfactorily assessed or mitigated. The application also falls short of demonstrating compliance with Policy 11 on energy, failing to meet the standards set out in NPF4. These shortcomings represent conflicts with the applicable legal and policy framework.

Given these unresolved issues and the absence of demonstrated compliance, the proposal conflicts with the statutory and policy requirements of NPF4. Where compliance has not been demonstrated, or where deficiencies and omissions exist, these matters weigh against the granting of consent. Therefore, the proposal should

be refused on the basis that it does not meet the essential policy tests set out in National Planning Framework 4.

The application fails to provide an adequate Environmental Impact Assessment (EIA) and Habitats Regulations Assessment (HRA) as required by law, rendering the proposal non-compliant with statutory obligations. Under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, it is mandatory that the likely significant environmental effects of the proposal be identified, assessed, and reported prior to any determination. This requirement has not been met. Furthermore, the Habitats Regulations mandate that the effects of the proposal on European protected sites must be assessed in accordance with the applicable statutory tests. The absence of such assessment means compliance with these regulations has not been demonstrated. Given these deficiencies and omissions, which conflict with the applicable legal and policy framework, the proposal should be refused consent.

The proposal fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be considered and afforded due weight in the decision-making process. This statutory obligation is not a discretionary matter but a legal requirement, and the absence of clear evidence that these interests have been properly assessed constitutes a fundamental procedural deficiency. Unlike proposals that fully integrate island community considerations through comprehensive engagement and impact analysis, this application lacks any substantive demonstration that such factors have been meaningfully incorporated or balanced. Consequently, the proposal falls short of the statutory standard set by the Islands (Scotland) Act 2018, undermining the integrity of the decision-making process.

Furthermore, the failure to demonstrate compliance with the Islands (Scotland) Act 2018, coupled with the evident omissions and deficiencies in addressing the interests of island communities, directly conflicts with the applicable legal and policy framework. As established in the approved evidence, where such compliance is not shown, these shortcomings weigh decisively against the granting of consent. The absence of any documented consideration or due weighting of island community interests is a material defect that cannot be overlooked. Therefore, in accordance with the statutory and policy context, the proposal should be refused consent on the grounds that it does not meet the mandatory requirements of the Islands (Scotland) Act 2018.

1.1.134 Conflict with National Planning Framework 4 and the Development Plan

NPF4 Policy 11 expressly supports renewable energy development; however, this support is contingent upon satisfying the policy’s own impact criteria, including those set out in clauses (c), (d), and (e) concerning effects on communities, landscapes, seascapes, and other receptors. In this instance, the proposal fails to comply with these critical criteria. It would result in significant adverse impacts on nationally designated landscapes and seascapes, undermining the policy’s environmental safeguards. Furthermore, the proposal does not adequately demonstrate that the cultural significance of scheduled monuments and their settings would be preserved, nor does it show that the interests of island communities would be protected.

Additionally, the evidence submitted does not establish that the necessary ecological tests can be met. Taken together, these shortcomings indicate that the proposal conflicts with the impact requirements of NPF4 Policy 11 and therefore cannot be supported under that policy framework.

The applicant's evidence acknowledges that Policy 11 operates in conjunction with several other critical provisions within NPF4, notably Policy 4(c) and 4(d), which safeguard National Scenic Areas and nationally important landscapes by preventing significant adverse impacts on their defining qualities. Additionally, Policies 7(c), 7(d), and 7(h) provide protection for scheduled monuments and their settings, while Policy 3 addresses biodiversity considerations. Together, these policies establish a comprehensive framework for the protection of designated assets at the national level.

However, the proposal under consideration does not satisfy these policy requirements. It would result in significant adverse effects on nationally designated landscapes and seascapes, undermining the very qualities that justify their protected status. Moreover, the applicant has not demonstrated that the cultural significance of scheduled monuments and their surrounding settings would be preserved, nor has there been adequate evidence to confirm that the interests of island communities would be safeguarded. These shortcomings indicate a failure to respect the statutory protections afforded to these assets.

Furthermore, the ecological assessments submitted have not proven that the relevant tests under Policy 3 can be met. Without robust evidence to support the claim that biodiversity interests will be maintained or enhanced, the proposal falls short of compliance with national policy. In light of these concerns, the proposal conflicts with multiple NPF4 policies designed to protect nationally important landscapes, heritage assets, and biodiversity, and therefore cannot be considered acceptable in its current form.

Uncertainty remains regarding the extent to which the proposal aligns with the terrestrial development plan framework, particularly the Argyll and Bute Local Development Plan 2. The concerns centre on the adverse effects the development would have on the landscape, heritage, and community interests that these policies are explicitly designed to protect. This raises significant questions about the proposal's compatibility with local planning objectives intended to safeguard these valued aspects of the environment and society.

In light of these conflicts, it is evident that the proposal does not accord with the development plan framework, nor with the National Planning Framework 4 when considered in its entirety. The applicant has not provided sufficient evidence to demonstrate otherwise. Consequently, the proposal should be regarded as inconsistent with the relevant planning policies, and this inconsistency weighs heavily against its approval.

1.1.135 Seascape, Landscape and Visual Effects

The practical consequence of the applicant's assessment methodology is that it systematically underestimates the magnitude of landscape and visual effects at

distances where the most sensitive designated landscapes are located. Despite the absence of any explicit distance threshold in the applicant's Appendix 16.1 beyond which major effects cease, the evidence demonstrates a consistent pattern across all three streams of assessment: no highly sensitive receptor beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of its inherent sensitivity or the extent of visibility. This pattern indicates an implicit distance-based moderation that is not transparently acknowledged in the methodology.

The applicant's own documentation further confirms the influence of distance in shaping judgements of effect magnitude. For example, an assessment of a coastal area over 30 kilometres away qualifies the scale of change as small, explicitly citing the viewing distance as a key factor. Similarly, the Landscape Character synthesis categorises magnitude as High within approximately 20 kilometres, Medium between roughly 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. These distance thresholds, while not formally stated in the methodology, effectively constrain the recognition of significant effects at greater distances, where important landscape receptors are situated.

As a result, the protective tests applied in the assessment process are based on understated inputs. By moderating magnitude values at distances coinciding with the location of the most sensitive designated landscapes, the conclusions drawn cannot be regarded as a reliable or accurate reflection of the true effects the Scottish Ministers are being asked to consider. This calls into question the robustness of the applicant's methodology and the validity of its predicted outcomes, undermining confidence in the decision-making process.

While mitigation measures may seek to minimise the visual impact of the proposed development, the introduction of aviation and navigation lighting represents an unavoidable change to the night-time seascape character. Currently, the sea horizon is unlit, and the permanent addition of such lighting over the 35-year operational period would fundamentally alter this aspect of the seascape. It is important to note that the operational lifespan does not confine the extent of harm in planning terms; consenting to the development effectively signifies acceptance that this seascape is appropriate for wind farm use. Therefore, despite potential mitigations, the development would result in a lasting and significant transformation of the night-time seascape character.

There remains significant uncertainty regarding the proposal's compliance with the suite of relevant planning policies designed to safeguard nationally important landscapes and seascapes. The effects identified engage specific provisions of the National Planning Framework 4, notably Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. Crucially, the applicant has failed to demonstrate that its assessment of the scale of these effects aligns with its own stated methodology. This lack of consistency undermines confidence in the conclusions reached and, consequently, in the assertion that the proposal adheres to the protections these policies afford. On this basis, it is concluded that the proposal does not comply with the key planning policies intended to protect the landscape and seascape interests at a national level.

1.1.136 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment acknowledges that the cultural significance of the heritage assets in question is not solely derived from their physical presence but from a complex set of experiential qualities. These include elements such as pilgrimage routes, arrival by sea, the sense of movement through a living cultural landscape, and the interrelationships between monuments, spirituality, and the encompassing landscape and seascape. Notably, these attributes are experienced dynamically through movement rather than static viewpoints, a factor that the applicant recognises in their baseline recording.

However, despite this recognition, the mitigation measures proposed appear insufficient to fully capture or preserve these broader cultural and experiential qualities. Historic Environment Scotland's consultation responses, as documented within the application, explicitly requested additional viewpoints to ensure that the assessment would adequately represent these wider landscape and seascape attributes. The absence of such comprehensive visual and experiential analysis potentially undermines the understanding of the heritage assets' significance and the effectiveness of the proposed mitigation. Consequently, there is a concern that the current assessment underrepresents the full cultural context and may not sufficiently safeguard the intangible qualities that contribute to the heritage assets' value.

The application engages directly with key national policies concerning heritage protection, specifically NPF4 Policy 7(h) relating to scheduled monuments, as well as Policies 7(c) and 7(d) which address the setting of heritage assets. Additionally, it invokes the provisions of Policy GEN 6 and the guidance contained within paragraphs 4.22 to 4.23 of the National Marine Plan. These policies collectively establish a rigorous framework intended to safeguard the cultural significance of heritage assets of international and national importance, ensuring their settings are preserved in the planning process.

Despite the clear policy context, the applicant has not provided sufficient evidence to demonstrate that the cultural significance of these heritage assets and their settings will be adequately protected. Crucially, the Scottish Ministers have not been presented with the comprehensive assessment necessary to reach such a conclusion. This omission undermines the application's compliance with the relevant heritage protection policies and consequently calls into question its acceptability within the established planning framework.

1.1.137 Effects on Island Communities, Tourism and the Local Economy

While mitigation measures may seek to address certain impacts, they cannot fully compensate for the fundamental harm posed by the proposal to the qualities that attract visitors to the island communities in question. The applicant's own baseline assessments identify key attributes such as landscape, seascape, cultural heritage, tranquillity and remoteness as the primary reasons visitors are drawn to these areas. These qualities form the essential foundation upon which the local economies depend, and any alteration or degradation of these attributes would have profound consequences.

The exceptional reliance of these island communities on visitor-generated income means that changes undermining their appeal strike directly at their economic base. This, in turn, jeopardises the provision of local services, threatens population retention, and undermines the overall social and economic sustainability of these communities. It is therefore clear that the proposal, by impacting the very qualities that attract visitors, poses a serious risk to the continuing viability of the islands. Such fundamental effects cannot be adequately mitigated and must be given significant weight in the planning decision.

The practical consequence of the applicant's approach is a fundamental underestimation of the potential socio-economic impacts on island communities directly affected by the proposal. While the applicant's consultants acknowledge habitability as a significant pathway for impact, no specific assessment of the habitability of these islands has been undertaken. Instead, the socio-economic assessment in Chapter 18 focuses primarily on regional port communities with detailed analysis, neglecting an equivalent, place-based assessment of the island communities themselves. Despite this lack of focused analysis, the assessment nonetheless concludes that these island communities exhibit low sensitivity to tourism effects, a conclusion that lacks substantive evidential basis.

This conclusion fails to recognise the unique economic characteristics of small island communities, which cannot be accurately represented by regional averages. Island economies are typically concentrated in sectors highly sensitive to changes in the environmental qualities that attract visitors. Moreover, an increasing dependence on visitor numbers intensifies, rather than mitigates, this sensitivity. Without place-specific analysis, the assertion of low sensitivity amounts to an unsubstantiated assumption rather than evidence-based reasoning. Consequently, the socio-economic assessment methodology is flawed and insufficient to properly understand or mitigate the impacts on the island communities facing the development.

There remains significant uncertainty as to whether the proposal complies with the necessary policy and statutory requirements concerning island communities. The proposal engages GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions be based on robust socio-economic evidence and that a precautionary approach be adopted where such evidence is lacking. Additionally, NPF4 Policy 11(c) alongside the Islands (Scotland) Act 2018 require that the interests of island communities are thoroughly assessed and given appropriate weight through meaningful engagement throughout the planning process. However, the applicant has acknowledged the need for particular scrutiny of island communities but has failed to carry out the required assessment to understand the proposal's effects on them. Consequently, it has not been demonstrated that the proposal aligns with the principles of sustainable island communities, nor that the statutory duties owed to these communities have been fulfilled. Given these shortcomings, the proposal does not meet the requisite standards for protecting island communities and should therefore be refused.

1.1.138 Ecology, Biodiversity and Habitats Regulations

The proposed development presents a scale of construction, operation, and decommissioning activity that would extend over several decades within an

ecologically sensitive marine environment. Mitigation measures for such large-scale projects are typically designed to minimise disturbance to local ecosystems; however, the presence of Priority Marine Features and Annex I habitats within the development area itself indicates a heightened vulnerability. Surrounding waters are known to support important populations of seabirds, marine mammals, and basking sharks, all of which are species that require careful consideration due to their protected or conservation status.

Given this context, the potential for significant adverse environmental effects arising from the development cannot be discounted. The extensive duration and intensity of the proposed activities may lead to habitat degradation and disturbance to protected species, challenging the effectiveness of standard mitigation strategies. Therefore, the ecological importance and sensitivity of the site, as well as the surrounding marine environment, warrant rigorous assessment and cautious decision-making to ensure that any impacts are thoroughly understood and appropriately managed.

The applicant has provided a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically addressing the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are customarily prepared when it is not possible to exclude adverse effects on the integrity of a protected site. Their inclusion in the submission is therefore a notable aspect of the application, indicating that the applicant acknowledges potential impacts that may arise.

This approach reflects an understanding that the Scottish Ministers may ultimately reach a different conclusion regarding the likelihood of adverse effects on the protected site’s integrity. By submitting these derogation and compensation measures, the applicant demonstrates a proactive stance aimed at addressing any such impacts in accordance with the derogation provisions. This recognition and corresponding documentation are integral to the assessment of the application’s compliance with relevant environmental protections.

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

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

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

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

1.1.139 Cumulative and In-Combination Effects

The current assessment process for the project fails to provide a comprehensive evaluation of its environmental and operational impacts, as only a portion of the development—the wind farm itself—is before the Scottish Ministers. Crucially, key components such as the export cable corridor and onshore transmission works, which are essential for the wind farm's operation, are deferred to separate future applications. This fragmented approach precludes a full understanding of the cumulative effects, as the necessary infrastructure enabling the project's function is excluded from the initial consent. Consequently, significant impacts are deferred to subsequent consenting stages, limiting the ability of decision-makers to consider the project's totality at once.

This method of piecemeal assessment is inconsistent with established legal principles, notably those upheld in Raeshaw Farms, which emphasise that a project must be evaluated in its entirety rather than divided into smaller segments to minimise apparent individual effects. By salami-slicing the development into separate parts, the assessment undermines the procedural requirement for holistic scrutiny and risks overlooking cumulative impacts that could influence the overall acceptability of the proposal. Therefore, the current approach is procedurally and legally flawed, and it is imperative that the full scope of the project, including all integral elements, is assessed together to ensure a robust and lawful decision-making process.

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

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

The applicant's submission engages directly with the requirements set out under GEN 21 and paragraph 4.85 of the National Marine Plan, alongside Policy 11(e) of the National Planning Framework 4 (NPF4), as well as the Environmental Impact Assessment (EIA) Regulations concerning project splitting. Despite these clear statutory and policy frameworks, the application fails to provide adequate demonstration that the cumulative and in-combination effects of the development proposal have been comprehensively identified and assessed. Furthermore, the

assessment does not satisfactorily address the overall effects of the project in its entirety. This omission is significant given the legal and policy emphasis on ensuring that all elements of a project, including those that may be deferred or implemented subsequently, are considered holistically to avoid underestimation of environmental impacts.

In particular, there is an evident lack of explicit consideration regarding the deferred works within the project's environmental and planning assessment. Such deferred components may contribute materially to cumulative environmental effects and thus must be expressly evaluated as part of the decision-making process. Without this thorough and transparent appraisal, the application does not comply with the relevant planning policies and regulatory requirements designed to prevent project splitting and ensure robust environmental governance. It is therefore essential that the decision-making authority requires the applicant to explicitly address the treatment of deferred works, thereby ensuring full compliance with the National Marine Plan, NPF4, and the EIA Regulations, and enabling a properly informed determination of the proposal.

1.1.140 Public Engagement, Site Selection and Environmental Information

The environmental information submitted with the application is insufficient for the Scottish Ministers to make an informed determination at this stage, particularly when compared to the requirements for mitigation and assessment under the EIA Regulations. The Environmental Impact Assessment (EIA) provided does not meet the necessary standard of sufficiency; it identifies potential pathways to significant effects but fails to investigate these comprehensively or apply robust methodologies consistently. For instance, the landscape assessment relies on a distance-based pattern not supported by its own stated methodology, the heritage assessment lacks demonstrated application of its integrity test, and the socio-economic assessment omits a place-based analysis pertinent to the affected islands. Furthermore, the applicant's reliance on post-consent measures such as future assessments, monitoring, and additional approvals does not satisfy the regulatory requirement to understand likely significant effects prior to determination. The Scottish Ministers are compelled to decide based on the evidence presented and cannot assume that outstanding matters will be resolved satisfactorily at a later stage. Consequently, the applicant has not demonstrated that the environmental information provided is adequate for a reasoned decision to be made.

1.1.141 Effects on Local Area

The proposed development encompasses a substantial 448 square kilometre area situated immediately north-west of Islay and west of Colonsay, placing these islands in closest proximity to the project site. Despite this, the applicant's assessment inadequately addresses the direct and significant effects on Islay's Atlantic-facing communities, which confront the nearest edge of the development area. Rather than evaluating Islay as an affected island community in its own right, the application primarily considers it only in terms of its potential role as a direct project location, thereby neglecting any place-based analysis of impacts on local setting, economy, or community life.

Similarly, the assessment underestimates the effects on Colonsay and Oronsay, where the seaward outlook integral to daily life faces the array directly. The North Colonsay and Western Cliffs Special Protection Area, which constitutes Colonsay's own coastline, is the subject of the applicant's derogation case and compensation plan, implicitly acknowledging that harm to the internationally protected seabird population cannot be ruled out. Moreover, Oronsay Priory, a scheduled monument of national importance within this community's area, suffers from the same gaps identified in the heritage assessment, particularly concerning the treatment of its open maritime setting. Together, these omissions undermine the reliability of the environmental and heritage impact evaluation submitted.

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

Despite this, the assessment underestimates the cultural and community significance of these effects. Iona's monastic landscape, comprising internationally important heritage assets such as the Abbey, the Nunnery, and high crosses, is intrinsically linked to pilgrimage, arrival by sea, and movement through the landscape, as detailed in the applicant's own baseline. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet no visualisations were provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, leaving important heritage perspectives unassessed. Furthermore, a household consultation revealed that 92 per cent of Iona respondents object to the proposal, yet the applicant failed to assess habitability impacts, despite acknowledging this as a potential pathway of effect. The perceived scale of the turbines is emphasised by the comparison to Ben Hynish on Tiree, a 141-metre landmark visible from Iona at 33 kilometres; the turbines would exceed this height by approximately 194 metres at just two-thirds of that distance. Taken together, these factors indicate that the applicant's evaluation significantly understates the visual, community, and heritage impacts on Iona, compromising the accuracy of the environmental and social impact assessment.

The applicant's assessment acknowledges potential effects on designated landscapes within the Loch na Keal National Scenic Area, including Ulva, Staffa, Jura, and the Scarba, Lunga and the Garvellachs National Scenic Area, yet its conclusions understate the significance of these impacts. Ulva, a community-owned island at the outset of regeneration, shares fully in the effects on the National Scenic Area; its small, re-establishing community depends fundamentally on the unspoilt seascape and setting that the development threatens, yet no specific assessment has been undertaken for Ulva's unique circumstances. Staffa, situated approximately 35 kilometres from the development, lies beyond the 30-kilometre threshold recommended by NatureScot for assessing National Scenic Area qualities; notwithstanding the applicant's acceptance of the island's panoramic maritime

qualities, it concludes that effects there would be small and not significant. Similarly, the Jura National Scenic Area, assessed at a distance of about 28 to 32 kilometres and of high sensitivity, is attributed only medium to low magnitude effects due to perceived mitigation by distance and retained landforms, despite its designation being founded on the wild and undeveloped character of its Atlantic outlook. The Scarba, Lunga and the Garvellachs National Scenic Area, located 35 to 40 kilometres away, is treated in the same manner. This approach collectively underestimates or omits significant effects on these important designated landscapes and fails to recognise the vulnerability of island communities such as Ulva, thereby undermining the protection of their natural and cultural qualities.

The applicant's assessment significantly underestimates the impact on Tiree's distinctive landscape, resulting in an unreliable evaluation of effects. The South Tiree coastal area is identified as having High sensitivity at a distance of approximately 35 kilometres, yet the magnitude of change is attributed as Low. This assessment fails to recognise the fundamental characteristics of Tiree's landscape, which is exceptionally low-lying and defined by the dominance of sea and sky. With its highest point, Ben Hynish, rising only 141 metres, the introduction of turbines up to 335 metres tall would create vertical structures unprecedented in the island's seascape. Given that Tiree's character is based on an open oceanic horizon, this scale of development would cause a far greater magnitude of change than acknowledged. Therefore, the conclusion of Low magnitude is a clear understatement for such an exposed and sensitive receptor, undermining the credibility of the applicant's assessment.

The applicant's assessment has overlooked significant effects on mainland and island communities that have direct visual and economic connections to the seascape in question. Notably, Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by residents, faces the development area from the east. Despite the island's finely balanced community and economy, the assessment fails to examine the impacts on Gigha, thereby omitting consideration of a key receptor intimately linked to the seascape.

Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the sensitive receptors to which the applicant's distance-based mitigation approach is applied, raising concerns about the validity of this method. Additionally, the chain of communities along the west coast of Kintyre, whose character and visitor economy depend on open Atlantic seaboard views towards Islay, Jura, and surrounding waters, along with the Treshnish Isles and other small islands and mainland coasts overlooking the development site, have also been excluded from assessment. This omission undermines the comprehensiveness of the applicant's evaluation and leaves unaddressed potential adverse effects on these interconnected communities.

There remains considerable uncertainty surrounding the applicant's reliance on a distance-based methodology that applies systematic moderation and discounting of effects beyond approximately 20 kilometres. This approach inherently assumes that impacts diminish uniformly with distance, yet it fails to account for the nuanced and place-specific sensitivities of receptors located beyond this threshold. Such

generalisation risks overlooking significant adverse effects that may persist or manifest differently at greater distances, thereby compromising the thoroughness of the environmental impact assessment.

Critically, as evidenced, the applicant’s assessment effectively minimises the magnitude of change experienced by highly sensitive receptors beyond the 20-kilometre boundary, while neglecting to conduct any detailed place-based evaluation for the affected communities. This procedural omission undermines the integrity of the assessment process and its conclusions, leaving those communities without due consideration of the effects they endure. Consequently, the applicant’s approach does not provide a robust or comprehensive appraisal of environmental impacts and should be re-examined to ensure all significant effects are properly identified and addressed.

1.1.142 Personal Observations

In addition to the planning matters above, I am personally concerned because: The proposal does not affect me personally, but in a time of devastating changes to the planet, we should pause and think beyond financial gain. If wind piwer is needed (it most definately is)
, in yhis area it should be at a much smaller scake and be a Scottish owned company and proceeds should be for the benefit of Scotland, not an oversras developer.

Based on my own local knowledge, I also wish to highlight that: The whole region is an area of national/ international importance - in an age of mass extinctions, humans should not be determining the fate of other species or subjecting them to the forces of unintended consequences. All creatures occupy a niche and the interactions between them support all plant/animal communities. If the disappearance of one or more is caused, the domino effect in such an area would be catastrophic. The development will disturb sea bed sediment, the water will become cloudy, marine life will be impacted in ways that may not have been investigated.

Finally, I would also ask the Scottish Ministers to consider: The UK as a whole list out when drilling rights in the North Sea were sol to foreign investment companies. Short term gain won out over long yerm accrual. Don't repeat this. For Scotland to benefit long term, any such development must meet with local approval and be Scottish owned.
Local disapproval may lead to islanders leaving resulting in loss of services for those who do not have the capacoty to leave.

1.1.143 Summary

The proposal before the Scottish Ministers has not been substantiated as compliant with the relevant statutory and policy frameworks governing its determination. The applicant’s own assessments acknowledge significant impacts on nationally designated landscapes, as well as on the heritage and communities of the coastal area. However, independent analyses of the submitted documentation reveal that these impacts have been understated. Crucially, the mandatory heritage assessment has not been conducted. Furthermore, although the detrimental effects on the island

communities affected by the development were identified, no formal evaluation of these impacts has taken place. The ecological requirements set by law have not been demonstrated to be achievable. Additionally, the application submitted represents only a portion of the overall project, omitting key elements from the consideration of the Scottish Ministers.

In light of these deficiencies, it is respectfully submitted that consent for the MachairWind Offshore Wind Farm should be refused, alongside the associated marine licence. Should the Scottish Ministers be inclined to grant approval, it is urged that they require the provision of further environmental information and enhanced visualisations. Moreover, the determination of these applications should be deferred until after a public inquiry, thereby ensuring that all concerns raised in this objection can be fully and impartially examined. Irrespective of the final decision, it is requested that the Ministers provide clear and explicit conclusions within their reasons, particularly addressing the impacts on cultural heritage and the affected island communities.

Yours faithfully,

[Redacted]

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

Member of the public 516
Dear Sir/Madam,

I hereby submit a formal objection to the applications numbered 00012385 and 00012386, submitted by MachairWind Limited (ScottishPower Renewables), seeking consent under section 36 of the Electricity Act 1989 and a marine licence under Part 4 of the Marine (Scotland) Act 2010, respectively. I request that this correspondence be recorded as an official objection, that I be registered accordingly, and that I receive notification of the outcome of these applications.

The proposals concern the development of an offshore wind farm with a generating capacity of approximately 2 gigawatts. This project entails the installation of between 91 and 144 turbines, each reaching up to 335 metres to blade tip, within a designated Windfarm Development Area spanning around 448 square kilometres. The site lies to the north-west of Islay and west of Colonsay, situated roughly 21 kilometres from Iona, and in close proximity to the islands and coastal communities of the southern Hebrides.

In evaluating these applications, the statutory and policy framework mandates that the onus lies squarely on the applicant to provide sufficient and compelling evidence to satisfy all relevant planning and environmental tests. Objectors are not required to disprove the application but may rely on the applicant's failure to meet this evidential burden. Having considered the information presented, I conclude that the applicant has not fulfilled this responsibility. Therefore, based on the planning and environmental grounds detailed herein, I urge that consent be refused.

1.1.144 Legislative and Policy Framework

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

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

Similarly, the application does not satisfy GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas. The proposal's effects on these sensitive areas have not been properly evaluated or addressed. The failure to comply with GEN 9 (Natural Heritage) is also evident, as the application does not provide convincing evidence that natural heritage interests will be protected or enhanced, contrary to the policy's objectives.

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

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

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

The proposal fails to provide the comprehensive environmental impact assessment mandated by The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which require all likely significant environmental effects to be identified, assessed, and reported prior to any determination. This fundamental procedural requirement has not been met, resulting in an incomplete evidential basis for decision-making and undermining the statutory framework designed to safeguard environmental interests.

Furthermore, the proposal does not comply with the Habitats Regulations, which necessitate a rigorous assessment of effects on European protected sites in accordance with the applicable statutory tests. The absence of demonstrated compliance and the presence of deficiencies and omissions in the submitted evidence directly conflict with these legal obligations. Such failures weigh decisively against the granting of consent, as the statutory tests have not been satisfied and the proposal's potential adverse impacts on protected habitats remain unassessed and unmitigated.

The Islands (Scotland) Act 2018 mandates that the interests of island communities must be considered and accorded due weight in the decision-making process. In this case, the proposal fails to demonstrate compliance with this statutory requirement. The evidence shows clear deficiencies and omissions in addressing the specific needs and circumstances of island communities, resulting in a failure to properly consider and weigh their interests as required by the Act. Such shortcomings constitute a conflict with the applicable legal and policy framework. Where compliance with the Islands (Scotland) Act 2018 has not been demonstrated, and where evidence identifies these material deficiencies, the weight of the law directs that consent should not be granted. Therefore, on the basis of the proposal's failure to meet the statutory obligations under the Islands (Scotland) Act 2018, the application should be refused.

The applicant has failed to provide robust, objective, and proportionate evidence demonstrating compliance with all relevant statutory duties, planning policies, and environmental assessment requirements. This failure to meet the evidential burden means that the application does not satisfy the necessary legal and policy frameworks governing the proposal.

Given that compliance has not been demonstrated and the evidence reveals deficiencies and omissions in fulfilling these obligations, the application conflicts with the applicable legal and policy framework. Such unresolved matters must weigh against the granting of planning consent.

1.1.145 Conflict with National Planning Framework 4 and the Development Plan

Policy 11 must be considered alongside other relevant provisions within the National Planning Framework 4, specifically Policy 4(c) and 4(d), which protect National Scenic Areas and nationally important landscapes from significant adverse effects on the qualities for which they are designated. It also operates in conjunction with Policy 7, including Policy 7(h) concerning scheduled monuments and Policies 7(c) and 7(d) relating to the setting of historic assets, as well as Policy 3 on biodiversity. These policies collectively establish a comprehensive framework aimed at safeguarding the natural, cultural, and ecological integrity of nationally important assets.

The proposal, however, fails to comply with these interrelated policies. It would result in significant adverse effects on nationally designated landscapes and seascapes, undermining their protected qualities. Furthermore, there is no demonstrated assurance that the cultural significance of scheduled monuments and their settings will be preserved. The safeguarding of island communities, as required by the relevant policies, has not been evidenced, and the ecological tests set out in Policy 3 have not been shown to be capable of being met based on the submitted evidence. Consequently, the proposal conflicts with multiple policies designed to protect designated assets of national importance and should be considered contrary to the National Planning Framework 4’s objectives.

1.1.146 Seascape, Landscape and Visual Effects

The applicant’s assessment methodology fails to specify any distance threshold beyond which major effects are considered to cease, resulting in a systematic understatement of potential impacts on sensitive receptors. Analysis of the applicant’s own Chapter 16 and Appendices 16.1 to 16.3 reveals a consistent pattern: no highly sensitive receptor located beyond approximately 20 kilometres from the development is attributed the highest magnitude of change, regardless of its inherent sensitivity or the extent of visibility. This omission directly affects the reliability of the predicted effects and thus the validity of the protective assessments.

Further evidence within the applicant’s documents confirms the influence of distance on the assessment outcomes. For instance, a coastal area situated over 30 kilometres from the site is judged to experience only a small scale of change due to viewing distance. Additionally, the Landscape Character synthesis differentiates magnitude of change by distance bands, assigning High magnitude within around 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres

for certain landscape types. Such gradations indicate an implicit, though unarticulated, distance threshold that governs the evaluation of visual and landscape effects.

The practical consequence of this approach is that the protective tests required to safeguard sensitive designated landscapes are applied to inputs that are systematically moderated by distance. As a result, the conclusions presented to the Scottish Ministers do not reliably represent the true extent of effects at distances where the most sensitive landscapes are located. This calls into question the robustness of the applicant's assessment methodology and undermines confidence in the overall findings submitted for consent consideration.

The proposal fails to comply with key planning policies designed to safeguard nationally important landscape and seascape interests, resulting in unacceptable adverse effects. Specifically, these impacts engage National Planning Framework 4 (NPF4) Policies 4(c), 4(d), 11(d), and 11(e), as well as Policy GEN 7 and paragraph 4.28 of the National Marine Plan. The applicant has not adequately demonstrated that its conclusions regarding the scale of these effects are consistent with its own assessment methodology. Consequently, the proposal does not satisfy the requirements of the relevant policies intended to protect the integrity of nationally significant landscapes and seascapes. Therefore, it should be considered non-compliant with the established policy framework.

1.1.147 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment adopts Historic Environment Scotland's recognised methodology for evaluating effects on the setting of historic assets, a framework developed and refined through consultation with the agency. This methodology mandates a careful evaluation of whether changes to setting affect the contribution that setting makes to the cultural significance of heritage assets, with particular attention to whether the integrity of setting is maintained. Crucially, it emphasises that visual change alone should not be conflated with adverse impact, underscoring the need for a nuanced and principled assessment beyond mere visibility or alteration of views.

However, a Methodological Audit prepared in support of community objections to the applications, based solely on the applicant's Appendix 14.3, reveals that while the operational assessment identifies key heritage attributes, it fails to demonstrate how the integrity of setting has been assessed in accordance with the applicant's own accepted methodology. The assessment largely describes visual change—considering factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—and then summarily concludes that the integrity of setting is adequately retained. This critical evaluative step, required by the methodology to establish whether changes to setting materially affect cultural significance, is not evidenced in any of the examples examined by the Audit. Consequently, the reliability of the applicant's conclusions regarding heritage impacts is undermined by this methodological shortcoming.

While the applicant's assessment acknowledges the cultural significance of the affected heritage assets, identifying key qualities such as pilgrimage, arrival by sea,

movement through a living cultural landscape, and the interconnectedness of monuments, spirituality, and their surrounding landscape and seascape, it appears that the mitigation measures proposed may not fully address these dynamic experiential aspects. The applicant's baseline explicitly recognises that these values are experienced through movement rather than from fixed viewpoints, underscoring the importance of a broader cultural landscape perspective. Furthermore, Historic Environment Scotland, in their consultation responses recorded within the application, requested additional viewpoints to ensure that these wider qualities would be properly represented. This suggests that the current assessment and proposed mitigation may be insufficient in capturing the full extent of the heritage assets' cultural significance. Therefore, while some mitigation is offered, it falls short of encompassing the holistic and experiential qualities fundamental to the heritage assets, warranting further consideration to adequately protect their cultural value.

The practical consequence of the deficiencies identified in the landscape assessment is that the conclusions drawn regarding heritage impacts cannot be regarded as fully reliable. The heritage conclusions are explicitly dependent upon the findings of the landscape assessment; therefore, any understatement of landscape effects directly affects the accuracy of the heritage impact appraisal. This interdependency means that flaws in the landscape evaluation inevitably lead to a corresponding understatement in the heritage analysis.

It is clear that where landscape effects have been understated, as previously demonstrated, the heritage conclusions that rely upon those assessments inherit the same understatement. This creates a chain of understated impacts, whereby the significance of harm to heritage assets may be minimized or overlooked altogether. The reliance on an incomplete or insufficiently rigorous landscape assessment undermines the credibility of the overall heritage impact conclusions presented.

In light of this, it is essential that the landscape assessment is robust and comprehensive, as it forms a critical foundation for understanding the full extent of heritage impacts. Without rectifying these shortcomings, the heritage conclusions remain questionable and cannot be confidently used to inform planning decisions. Therefore, the current heritage impact assessment should be reconsidered with a properly conducted landscape appraisal to ensure that all effects are accurately captured and reported.

The applicant's submission engages directly with the requirements of NPF4 Policy 7, specifically subsection (h) concerning scheduled monuments and subsections (c) and (d) relating to their setting, as well as Policy GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. These policies collectively mandate the protection of the cultural significance of heritage assets, particularly those of international and national importance, alongside careful consideration of their surrounding context.

However, the applicant has failed to demonstrate that the cultural significance of these heritage assets and their settings will be adequately safeguarded. Moreover, the Scottish Ministers have not been provided with the necessary assessment to support any such conclusion. This absence of critical evidence undermines the application's compliance with key heritage protection policies and calls into question its overall acceptability.

1.1.148 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development rely exceptionally heavily on visitors drawn specifically by the landscape, seascape, cultural heritage, tranquillity and remoteness, as identified in the applicant's own baseline assessments. Any alteration to these defining qualities would directly undermine the economic foundations of these communities. This, in turn, would jeopardise essential local services, diminish population stability, and threaten the long-term viability of the island settlements.

The applicant's own consultants acknowledge that habitability constitutes a potentially significant pathway through which the proposal could impact island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic appraisal presented in Chapter 18 focuses predominantly on the regional scale, providing detailed examination of potential port communities but omitting an equivalent place-based analysis for the island communities most directly facing the development. This approach nonetheless leads to the conclusion that these island communities possess low sensitivity to tourism effects.

However, this conclusion warrants careful scrutiny. Small island economies are not simply reflective of regional averages; rather, their economic structures are often heavily concentrated in sectors that are particularly vulnerable to changes in the characteristics that attract visitors. Moreover, their reliance on increasing visitor numbers does not serve to mitigate this sensitivity but rather intensifies dependence on the very qualities that may be at risk from the proposed development. Therefore, the assessment's failure to conduct a place-based analysis undermines the validity of the low sensitivity conclusion.

In light of this, the socio-economic assessment methodology employed by the applicant is flawed and insufficient for understanding or mitigating the potential impacts on island communities. A more detailed, island-specific evaluation is necessary to accurately capture the sensitivity and vulnerabilities of these communities, ensuring that any consequential effects are properly identified and addressed. Without such an approach, the assessment risks overlooking significant adverse socio-economic consequences.

The proposal fails to meet essential planning and statutory requirements for assessing and protecting island communities, which raises significant concerns about its suitability. Without a thorough understanding of the potential impacts on these communities, there is a practical risk that adverse socio-economic consequences may arise, undermining the sustainability and well-being of island populations.

This shortfall directly contravenes established policy and statutory duties. Specifically, the proposal engages provisions set out in GEN 19 and paragraph 4.81 of the National Marine Plan, both of which mandate that decisions be founded on robust socio-economic evidence and adopt a precautionary approach where such evidence is insufficient. Additionally, the requirements of NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 are clear in demanding that the interests of island

communities be assessed comprehensively and given substantial weight through meaningful engagement from the earliest stages to project completion.

The applicant acknowledged the need for particular scrutiny of island communities yet failed to carry out the necessary assessments to understand fully how the proposal might affect them. Consequently, it has not demonstrated compatibility with the principles of sustainable island communities, nor has it shown that the statutory duties owed to these communities have been fulfilled. This represents a significant deficiency that should weigh decisively against the proposal's approval.

1.1.149 Ecology, Biodiversity and Habitats Regulations

There is uncertainty regarding the full extent of ecological impacts arising from the proposed development, given its location within an area containing Priority Marine Features and Annex I habitats. These sensitive environmental assets lie directly within the development zone, while the adjacent waters provide habitat for various protected species, including seabirds, marine mammals and basking sharks. The scale of construction, operational activities and eventual decommissioning envisaged would occur over several decades, raising concerns about potentially significant adverse effects on this ecologically important marine environment. Consequently, it is imperative that these considerations are thoroughly addressed before the proposal proceeds.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically focused on the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are typically prepared in circumstances where an adverse effect on the integrity of a protected site cannot be ruled out. Their submission represents a notable aspect of the application, demonstrating that the applicant acknowledges the potential for such impacts.

By providing these materials, the applicant indicates an awareness that the Scottish Ministers may ultimately reach a different conclusion regarding the presence or absence of adverse effects on the protected site's integrity. This cautious approach reflects an understanding of the sensitivity of the designated area and the importance of addressing possible ecological consequences in a structured manner.

In submitting these derogation and compensation documents, the applicant seeks to ensure that, should any adverse impacts be identified, appropriate measures can be considered to mitigate harm to the guillemot population. This approach aligns with the regulatory framework governing protected sites, whereby derogations and compensatory provisions are necessary components when potential effects cannot be excluded at the outset.

Consent for developments affecting protected habitats and species can only be granted if it is firmly established that the proposal will not adversely affect the integrity of the designated site. This requirement demands that no reasonable scientific doubt remains regarding the absence of harm, placing a heavy evidential burden on the applicant. Importantly, the presence of mitigation measures, compensation proposals, or plans for future monitoring alone does not satisfy this

legal standard, as these cannot in themselves confirm compliance with the statutory tests.

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

The applicant's submission falls short of demonstrating compliance with the statutory tests designed to safeguard internationally important habitats and species. An examination of the applicant's own derogation documents reveals a significant degree of uncertainty regarding the effectiveness of proposed mitigation measures. Consequently, the evidence submitted fails to provide the necessary assurance that these legal requirements can be met, thereby undermining the justification for granting planning consent.

1.1.150 Cumulative and In-Combination Effects

The practical consequence of the current assessment approach is that it fails to provide a comprehensive evaluation of the project's overall impacts, as only part of the project is presently before the Scottish Ministers. Crucially, the export cable corridor and the onshore transmission works—both essential for the wind farm's operation—are excluded and deferred to subsequent applications. This fragmentation means that the cumulative effects of the entire project are never assessed together, but instead are considered piecemeal through later consenting processes after the principal decision has been made. Such an approach directly contravenes the established legal principle, affirmed by the courts in Raeshaw Farms, which requires a project to be assessed in its entirety rather than being artificially divided into smaller components whose individual impacts may appear less significant. Consequently, the current assessment methodology is legally and procedurally flawed, undermining the integrity of the environmental evaluation and the decision-making process.

The mitigation measures proposed in the Environmental Impact Assessment rely heavily on baseline assessments that have been demonstrated to understate the extent of landscape, heritage, and socio-economic effects. This foundational understatement consequently limits the scope and effectiveness of any mitigation strategy, as the true magnitude of impacts is not fully recognised from the outset. Without an accurate baseline, proposed measures may fail to address the full range of adverse effects, thereby diminishing their overall efficacy and potentially allowing cumulative impacts to remain unchecked.

Furthermore, the cumulative impact assessment itself is rendered unreliable due to this flawed baseline. As the cumulative assessment depends on the findings of the earlier, understated evaluations, the combined effects of the current proposal alongside existing, consented, and foreseeable developments are similarly underestimated. This results in a cumulative impact appraisal that does not reflect

the genuine scale of combined effects on the environment and local communities, undermining the robustness of the planning process and the protection of valued assets.

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

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

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

1.1.151 Public Engagement, Site Selection and Environmental Information

The environmental information submitted with the application is insufficient for the Scottish Ministers to make an informed determination at this stage, particularly when compared to the requirements for mitigation and assessment under the EIA Regulations. The Environmental Impact Assessment (EIA) provided does not meet the necessary standard of sufficiency; it identifies potential pathways to significant effects but fails to investigate these comprehensively or apply robust methodologies consistently. For instance, the landscape assessment relies on a distance-based pattern not supported by its own stated methodology, the heritage assessment lacks demonstrated application of its integrity test, and the socio-economic assessment omits a place-based analysis pertinent to the affected islands. Furthermore, the applicant’s reliance on post-consent measures such as future assessments, monitoring, and additional approvals does not satisfy the regulatory requirement to understand likely significant effects prior to determination. The Scottish Ministers are compelled to decide based on the evidence presented and cannot assume that outstanding matters will be resolved satisfactorily at a later stage. Consequently, the applicant has not demonstrated that the environmental information provided is adequate for a reasoned decision to be made.

1.1.152 Effects on Local Area

The applicant’s assessment acknowledges significant effects on the Ross of Mull South coastal area, which is identified as having High sensitivity at distances of approximately 22 to 24 kilometres and attributed Medium magnitude. Significant impacts are accepted at Erraid and on the Core Paths of the Ross, as well as at Fionnphort, the gateway to Iona and the primary embarkation point for visitors,

where the community is most directly affected by visitor flows. Similarly, across Mull, the applicant recognises significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, which encompasses Mull's western waters and islands and is assessed as High sensitivity throughout at distances of 21 to 33 kilometres, is nonetheless attributed no more than Medium magnitude.

However, this assessment relies heavily on distance-based reasoning, as exemplified by the treatment of the Wilderness and Gribun Rocks coastal area. Here, the applicant concludes that the scale of change is small due to the viewing distance exceeding 30 kilometres, a conclusion that this representation identifies as insufficiently reflective of actual visual and experiential impacts. Crucially, Mull's west-facing tourism economy, which includes wildlife boat operations and the accommodation sector of its western townships, depends fundamentally on the integrity of the Atlantic seascape that the development would industrialise. Despite this, none of these communities has received a place-based assessment tailored to their specific economic and social context.

In summary, the applicant's approach underestimates the significant visual, economic, and community impacts on Mull and Ross of Mull, particularly in relation to designated landscapes and tourism-dependent communities. This omission undermines a full understanding of the effects on these sensitive and economically reliant coastal areas.

The applicant's assessment of impacts on designated seaboard landscapes and island communities notably underestimates or omits significant effects, particularly when compared to the requirements for mitigation and consideration of natural and cultural qualities. For example, although Staffa lies approximately 35 kilometres from the development area—beyond the 30-kilometre range NatureScot recommended for assessing National Scenic Area (NSA) qualities—the applicant concludes that the scale of change there would be small and effects not significant. This conclusion stands despite the applicant's own recognition of Staffa's panoramic maritime qualities, which are integral to its status as one of Europe's most celebrated small islands. Similarly, the Jura NSA, situated around 28 to 32 kilometres away, is assigned a High sensitivity but only a Medium to Low magnitude of impact, justified by distance and retained landforms; yet this contradicts the fundamental basis of its designation, which emphasises the wild, undeveloped character of its Atlantic outlook. The Scarba, Lunga, and the Garvellachs NSA, at 35 to 40 kilometres distance, is treated with the same limited consideration, further evidencing an underestimation of potential effects.

Moreover, the assessment fails to address the specific circumstances of vulnerable island communities such as Ulva, located within the Loch na Keal NSA. Ulva is a community-owned island at the early stages of regeneration, reliant on the very qualities of setting and unspoilt seascape that the development threatens. No assessment has been made of the potential effects on this small, re-establishing community, despite its close connection to the designated landscape and the importance of preserving its natural and cultural environment for recovery. This omission undermines the protection intended for such communities and overlooks the cumulative impact of changes on their sustainability. Taken together, these

deficiencies in the applicant's assessment reveal a significant shortfall in recognising and mitigating effects on both wider designated landscapes and the island communities that depend on their intactness.

The applicant's assessment concludes a Low magnitude of change on the South Tiree coastal area despite recognising its High sensitivity at a distance of approximately 35 kilometres. This practical consequence is significant, as it directly affects the reliability of the overall evaluation of the development's landscape and visual impacts on Tiree. By underestimating the magnitude of change, the assessment risks providing decision-makers with an incomplete understanding of the true scale of effects on this sensitive area.

Tiree's distinctive landscape character is defined by its exceptionally low-lying topography and the dominance of sea and sky. The island's highest point, Ben Hynish, rises only 141 metres, underscoring the open and expansive oceanic horizon that shapes its sense of place. Introducing turbines up to 335 metres tall would create vertical structures of unprecedented scale within this seascape, fundamentally altering the visual experience and character of the island. Such a dramatic visual intrusion cannot reasonably be characterised as having a Low magnitude of change.

In light of these considerations, the applicant's conclusion exemplifies a severe understatement of the effects on Tiree. The assessment's failure to fully acknowledge the scale of visual and landscape impact on this highly sensitive receptor undermines the reliability of its findings. Consequently, the evaluation should be revisited to ensure that the distinctive and vulnerable character of Tiree is adequately protected in the planning process.

There remains significant uncertainty regarding the applicant's assessment, as it has failed to consider the effects on key mainland and island communities with direct visual and economic connections to the seascape. Notably, Gigha—a community-owned island celebrated nationally for its regeneration—faces the development from the east, yet the potential impacts on its delicately balanced community and economy have not been examined. This omission raises serious questions about the comprehensiveness of the assessment and whether all relevant receptors have been appropriately identified and evaluated.

Similarly, Ardnamurchan Point, the most westerly tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are exactly the receptors that the applicant's distance-based moderation approach seeks to diminish, yet they have been inadequately assessed. Additionally, the chain of communities along the west coast of Kintyre, whose character and visitor economy are intrinsically linked to the open Atlantic seaboard facing Islay, Jura, and adjacent waters, along with the Treshnish Isles and other nearby islands and coasts, share this visual and economic relationship with the development area. The failure to properly address these significant effects undermines the robustness of the applicant's conclusions and warrants a more thorough, inclusive evaluation before any consent is granted.

1.1.153 Summary

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

In light of these deficiencies, I respectfully urge the Scottish Ministers to decline consent for the MachairWind Offshore Wind Farm and to refuse the accompanying marine licence. Should the Ministers be inclined to grant consent, I request that they require the provision of further environmental information and enhanced visual representations. Furthermore, I recommend that determination of the applications be deferred until after a public inquiry, thereby ensuring a thorough examination of the concerns outlined in this objection. Regardless of the outcome, I also seek a clear and explicit statement within the Ministers' decision explaining their conclusions regarding the impacts on cultural heritage and the affected island communities.

Yours faithfully,

[Redacted]

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

Member of the public 517
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, corresponding to application number 00012385 for consent under section 36 of the Electricity Act 1989, and application number 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications, lodged by MachairWind Limited (ScottishPower Renewables), seek approval for a substantial offshore wind energy development. I request that my objection be formally recorded and that I receive notification of the final decisions concerning these applications.

The project under consideration involves the construction of an offshore wind farm with an installed capacity of approximately 2 gigawatts. It envisages the erection of between 91 and 144 turbines, each reaching up to 335 metres in blade tip height. This development is proposed within a designated Windfarm Development Area spanning around 448 square kilometres of marine environment situated to the north-west of Islay and west of Colonsay. The site lies approximately 21 kilometres from Iona and is in proximity to various islands and coastal communities within the southern Hebrides.

My objection is grounded upon planning and environmental considerations, which will be explicated below with reference to the statutory and policy frameworks applicable to these applications. It is incumbent upon the applicant to provide adequate and persuasive evidence demonstrating that all relevant statutory tests and policy criteria are satisfied. The onus does not lie with objectors to disprove the proposal. In this instance, I contend that the applicant has failed to discharge this burden effectively. Consequently, I maintain that the applications should be refused consent.

1.1.154 Legislative and Policy Framework

The application before the Scottish Ministers fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989. As established in the applicant’s own evidence (S01), Schedule 9 mandates that the applicant must have regard to the desirability of preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant is required to take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The Scottish Ministers, in determining the application, are similarly bound to have regard to these statutory duties.

The application documentation does not adequately address these requirements. There is a clear absence of evidence demonstrating that the applicant has sufficiently considered the preservation of natural beauty or the conservation of flora, fauna, and geological or physiographical features of special interest. Likewise, there is no substantive assessment or mitigation strategy presented for the protection of sites, buildings, or objects of architectural, historic, or archaeological interest that may be affected by the proposal. This omission constitutes a failure to meet the statutory obligations imposed by Schedule 9.

Given that the applicant has not demonstrated compliance with these statutory duties, and in light of the deficiencies and omissions identified in the evidence, the application conflicts with the applicable legal and policy framework. According to the applicant's own statement (S01), such failures weigh against the granting of consent. Therefore, the application should be refused on the basis that it does not satisfy the statutory requirements under Schedule 9 of the Electricity Act 1989.

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

The evidence before the authority does not demonstrate compliance with these statutory requirements and relevant National Marine Plan policies. There are identified deficiencies, omissions, and conflicts with the applicable legal and policy framework that have not been addressed or resolved within the application. As established by the statutory framework, where compliance has not been demonstrated or where such shortcomings exist, these matters must weigh against the granting of consent. Accordingly, the application fails to meet the necessary statutory and policy standards required for authorisation under the Marine (Scotland) Act 2010 and the National Marine Plan, and consent should therefore be refused.

The proposal fails to comply with key policies of National Planning Framework 4, specifically Policies 3, 4, 7, and 11, which address biodiversity, natural places, historic assets, and energy respectively. As a significant material consideration, the Framework must be applied alongside statutory duties and legislative requirements. The application does not demonstrate compliance with these policies, and the evidence identifies deficiencies and omissions in meeting the required standards.

Given these unresolved conflicts with the applicable legal and policy framework, the proposal does not satisfy the necessary criteria for consent under National Planning Framework 4. Consequently, these shortcomings weigh against the granting of planning permission.

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

failures constitute a clear conflict with the applicable legal and policy framework and, accordingly, weigh decisively against the granting of consent for this proposal.

The proposal fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be properly considered and given due weight in the decision-making process. This statutory obligation is not met by the application, as there is a clear absence of evidence showing that the specific needs and concerns of island communities have been adequately assessed or integrated into the planning rationale.

The Islands (Scotland) Act 2018 explicitly requires decision-makers to ensure that island communities' interests are a material consideration. However, the submitted documentation does not provide any substantive analysis or engagement outcomes that reflect these interests. This omission constitutes a significant procedural and evidential deficiency. Without such consideration, the proposal conflicts with the applicable legal and policy framework, undermining the statutory purpose of the Act.

Where compliance with the Islands (Scotland) Act 2018 has not been demonstrated, or where deficiencies and omissions are evident, these matters must weigh decisively against the granting of consent. In this case, the failure to properly consider and weigh island community interests is a fundamental flaw that renders the proposal unacceptable in planning terms. The application should therefore be refused on the basis that it does not satisfy the statutory requirements imposed by the Islands (Scotland) Act 2018.

The applicant has failed to provide robust, objective, and proportionate evidence demonstrating compliance with all relevant statutory duties, planning policies, and environmental assessment requirements. This failure to meet the evidential burden means that the application does not satisfy the necessary legal and policy frameworks governing the proposal.

Given that compliance has not been demonstrated and the evidence reveals deficiencies and omissions in fulfilling these obligations, the application conflicts with the applicable legal and policy framework. Such unresolved matters must weigh against the granting of planning consent.

1.1.155 Conflict with National Planning Framework 4 and the Development Plan

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

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

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

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

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

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

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

1.1.156 Seascape, Landscape and Visual Effects

The applicant's assessment methodology, as set out in Appendix 16.1, notably lacks a defined distance threshold beyond which major effects are considered to cease. Despite this omission, a comprehensive Evidence Note prepared in support of community objections—based entirely on the applicant's Chapter 16 and Appendices 16.1 to 16.3—demonstrates a consistent pattern across all three assessment streams. Specifically, no highly sensitive receptor located beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of the receptor's sensitivity or the extent of visibility. This pattern is further corroborated by the applicant's own documentation, which indicates that at viewing

distances exceeding 30 kilometres, the scale of change is judged to be small, and that the Landscape Character synthesis categorises magnitude as High within about 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types.

This implicit reliance on distance in moderating effect magnitude has significant implications for the accuracy of the applicant's conclusions. When magnitude is systematically reduced at distances coinciding with the location of the most sensitive designated landscapes, the input data feeding into the protective tests are understated. Consequently, the findings presented do not provide a reliable description of the potential effects that the Scottish Ministers are being asked to consent to. This undermines the robustness of the assessment and calls into question whether the full extent of landscape and visual impacts has been appropriately considered.

While the applicant has made efforts to mitigate visual impact through the use of visualisations consistent with NatureScot's guidance, it is important to recognise inherent limitations within these materials. NatureScot's own guidance, which the applicant follows, states that printed visualisations cannot fully replicate the scale experienced by a viewer in the field. Additionally, wireline drawings included within the same panoramic views share the same constraints as the accompanying photographs; they represent technical renderings within the visualisation rather than serving as independent corrections or enhancements. Consequently, reliance on these visual materials alone may lead to an underappreciation of the true extent of visual effects when experienced on site. It follows that while the visualisations contribute valuable information, their technical and perceptual limitations should be carefully considered in the overall assessment.

While mitigation measures might be considered to address lighting impacts, it is important to recognise that the introduction of aviation and navigation lighting will inevitably and permanently alter the character of the night-time seascape. Currently, the sea horizon in question remains unlit, and the proposed development would introduce such lighting for the full 35-year operational lifespan of the wind farm. This change is not merely a temporary inconvenience; rather, it represents a fundamental transformation of the seascape's visual qualities during nighttime hours. Moreover, this operational timeframe does not limit the policy harm. Granting consent for this development effectively signals that the seascape is deemed appropriate for wind farm use despite the significant and enduring alteration to its night-time character. Consequently, the impact on seascape character and the associated lighting effects warrant careful consideration in light of relevant planning policies before any approval is granted.

The proposal's failure to adequately address the scale of its impacts on landscape and seascape interests results in non-compliance with key planning policies, thereby undermining the protection afforded to nationally important areas. This practical shortcoming means that the development risks causing unacceptable harm to these valued environments, contrary to the guiding principles set out in national policy frameworks.

Specifically, the effects of the proposal engage multiple provisions, including NPF4 Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively seek to safeguard the integrity and character of significant landscapes and seascapes from adverse development impacts. The applicant has not demonstrated that its assessment of the scale of these effects aligns with the methodology it employed, creating uncertainty and undermining confidence in the conclusions presented.

Given this lack of demonstrated compliance, the proposal cannot be considered to meet the statutory requirements for protecting nationally important landscapes and seascapes. It follows that the application should be refused on the grounds of failing to satisfy relevant planning policies designed to preserve these environmental assets for the benefit of current and future generations.

1.1.157 Cultural Landscape, Archaeology and Historic Environment

The practical consequence of the applicant's assessment approach is a fundamental uncertainty regarding the true impact of the proposed development on the heritage assets' setting. While the applicant claims to follow Historic Environment Scotland's established methodology, which explicitly requires evaluating how changes affect the contribution of setting to cultural significance and whether the integrity of setting is maintained, their assessment falls short of this standard. The methodology clearly distinguishes between mere visual change and adverse impact, emphasising the need for a careful evaluative judgment rather than a simple description of what is seen.

A detailed Methodological Audit, prepared independently on behalf of community objectors and relying solely on the applicant's Appendix 14.3, reveals that the assessment identifies relevant heritage attributes such as visibility, distance, monument prominence, retained views, screening, and skyline occupation. However, it fails to demonstrate the critical evaluative step mandated by the methodology, namely an explicit assessment of whether the integrity of the setting is indeed retained. Instead, the report stops at describing visual effects and then asserts compliance with the integrity test without showing the reasoning or evidence supporting this conclusion.

This omission undermines the reliability and transparency of the applicant's heritage impact conclusions. Without a clear demonstration that the integrity of setting has been properly assessed and confirmed in accordance with the accepted methodology, decision-makers and stakeholders cannot be confident that the heritage significance has been adequately protected. It is therefore essential that the assessment be revisited to include a robust evaluative analysis consistent with the recognised Historic Environment Scotland approach before any weight is placed on its findings.

The applicant's baseline assessment acknowledges that the cultural significance of the affected heritage assets extends beyond isolated physical features, encompassing a complex array of experiential qualities. These include the significance of pilgrimage routes, the historical arrival by sea, and the dynamic experience of movement through a living cultural landscape. The relationships

between monuments, the spiritual associations they hold, and their integration within the surrounding landscape and seascape are central to the heritage value. Crucially, these elements are experienced not from fixed viewpoints but through continuous movement, highlighting the importance of understanding the heritage assets within their broader cultural and spatial context rather than as static or isolated features.

Historic Environment Scotland's consultation responses, as recorded within the application, reinforce this perspective by requesting additional viewpoints to ensure that these wider experiential and cultural qualities are fully represented. This indicates a recognition that the applicant's assessment, while comprehensive in certain respects, may not have adequately captured the full extent of the cultural landscape's significance. The omission of these wider viewpoints risks an incomplete understanding of how the heritage assets are perceived and valued in situ, potentially underrepresenting impacts on the cultural and spiritual dimensions integral to their heritage importance. In light of this, it is essential that any heritage impact assessment sufficiently encompasses these broader qualities to enable a fully informed planning decision.

The heritage conclusions presented rely significantly on the landscape assessment. As noted in the evidence, where the landscape effects have been understated, the resulting heritage conclusions inherently reflect this understatement. This dependency indicates that any deficiencies in accurately assessing landscape impacts directly compromise the credibility and reliability of the heritage impact findings. Consequently, the heritage conclusions must be viewed with caution, as their foundation in an inadequate landscape assessment weakens their overall validity.

The proposed development fails to comply with key policy requirements aimed at the protection of heritage assets. Specifically, it does not satisfy the provisions set out in NPF4 Policy 7(h) concerning scheduled monuments, nor does it meet the criteria within Policies 7(c) and 7(d) related to the setting of heritage sites. These policies are further reinforced by GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan, which collectively establish a clear framework for safeguarding the cultural significance of heritage assets.

Crucially, the applicant has not provided sufficient evidence to demonstrate that the cultural significance of internationally and nationally important heritage assets, along with their settings, will be maintained and protected. This omission represents a significant deficiency in the application, as the necessary assessment to support such a conclusion is absent. Without this critical information, it is not possible to ascertain the impact of the proposal on these valuable heritage resources.

Given the absence of a comprehensive assessment and the clear policy requirements that remain unfulfilled, the Scottish Ministers cannot be satisfied that the proposal accords with the heritage protection policies. Consequently, the application should not be approved as it currently stands, since it undermines the statutory obligations to protect and preserve heritage assets of national and international importance.

1.1.158 Effects on Island Communities, Tourism and the Local Economy

The proposal poses a direct threat to the fundamental economic and social sustainability of the island communities, which depend to an exceptional degree on visitors. These visitors are attracted by precisely those qualities—landscape, seascape, cultural heritage, tranquillity, and remoteness—that the applicant's own baseline assessments identify. Any changes to these qualities would undermine the economic base of these communities, with consequential impacts on local services, population stability, and their long-term viability.

The applicant's failure to assess the habitability of the affected islands means the socio-economic impacts on island communities have not been properly understood or mitigated. Although their own consultants recognised habitability as a potentially significant pathway for effect, no place-based analysis was conducted for these communities. Instead, the assessment in Chapter 18 focuses on regional-level analysis, detailing port communities while neglecting the island populations directly facing the development. Despite this omission, the report concludes that island communities exhibit low sensitivity to tourism impacts. This conclusion is fundamentally flawed. Small island economies differ markedly from regional averages, being heavily reliant on sectors vulnerable to changes in visitor-attracting qualities. Far from reducing sensitivity, dependence on increasing visitor numbers intensifies vulnerability to any degradation of those qualities. Therefore, the assertion of low sensitivity, reached without specific place-based evidence, cannot be accepted as sound assessment but must be regarded as an unfounded assumption.

The proposal fails to meet the necessary standards for assessing and protecting island communities, falling short of the requirements set out in the National Marine Plan and associated policies. While these frameworks, including GEN 19 and paragraph 4.81 of the National Marine Plan, alongside NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, mandate that decisions must be based on robust socio-economic evidence and adopt a precautionary approach when such evidence is incomplete, the applicant has not provided this level of scrutiny. Moreover, these policies require meaningful engagement with island communities throughout the decision-making process to ensure their interests are fully considered and given appropriate weight—a process that has not been satisfactorily demonstrated in this case.

The applicant acknowledged the need for particular attention to island communities but ultimately did not undertake the thorough assessment necessary to understand the potential effects of the proposal on these communities. There is a clear absence of evidence demonstrating compatibility with the principles of sustainable island communities. As a result, the statutory duties owed to these communities, which include careful evaluation and protection of their socio-economic wellbeing, have not been discharged. This omission undermines confidence in the proposal's compliance with relevant planning and statutory obligations, rendering it unsuitable for approval in its current form.

1.1.159 Ecology, Biodiversity and Habitats Regulations

The evidence submitted by the applicant clearly identifies that the development area encompasses Priority Marine Features and Annex I habitats, demonstrating the site's high ecological value. These designated features are critical components of the

marine environment, indicating habitats that are rare, sensitive, or otherwise of significant conservation importance. Moreover, the surrounding waters provide essential habitat for a variety of protected species, including seabirds, marine mammals, and the basking shark, all of which are recognised for their vulnerability and conservation status. The presence of such species and habitats within and adjacent to the development footprint underscores the intrinsic ecological sensitivity of the area and elevates the potential risk profile associated with any substantial anthropogenic disturbance.

Given the scale and duration of the proposed development, which entails construction, operation, and decommissioning activities extending over several decades, there exists a considerable potential for significant adverse environmental effects. The introduction of large-scale industrial activity into this ecologically important marine environment could disrupt habitat integrity, disturb protected species, and degrade the overall biodiversity value of the site. The prolonged nature of the development phases further amplifies the risk of cumulative and long-term impacts. Consequently, careful consideration must be given to the potential environmental consequences, and robust mitigation measures will be essential to avoid or minimise harm to these Priority Marine Features and protected species. Without such safeguards, the proposal poses a substantial threat to the conservation objectives associated with this sensitive marine ecosystem.

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

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

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

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

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

The practical consequence of the applicant's failure to demonstrate compliance with the statutory tests is that the proposed development cannot be lawfully approved without risking harm to internationally important habitats and species. A detailed examination of the submitted evidence, including the applicant's own derogation documents, reveals an absence of sufficient certainty that the necessary legal protections will be upheld. This lack of demonstrable compliance undermines the statutory framework designed to safeguard these ecological features. Consequently, the application falls short of the legal requirements, and consent should therefore be withheld.

1.1.160 Cumulative and In-Combination Effects

The applicant's evidence clearly establishes that only a portion of the overall development is currently before the Scottish Ministers for consideration. Specifically, the export cable corridor and the onshore transmission works, which are integral components without which the wind farm cannot function, have been deliberately deferred to subsequent applications. This segmentation means that the cumulative effects of the entire project are never assessed concurrently, with critical elements subjected to separate consenting processes following the primary decision. Such an approach is fundamentally flawed, as it undermines the ability of decision-makers to fully comprehend the full scope and impact of the development at the time of determination.

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

and it is imperative that the project be assessed as a whole to ensure compliance with planning law and proper environmental governance.

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

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

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

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

1.1.161 Public Engagement, Site Selection and Environmental Information

The consultation process surrounding this application has resulted in a practical consequence that undermines the legitimacy of the site-selection exercise itself. The applicant requests that Scottish Ministers accord significant weight to the site-selection process; however, the quality of public participation during both the plan and site-selection stages has been deficient and these shortcomings have persisted into the current application phase. The sheer volume of technical documentation, spanning many thousands of pages, presents an unreasonable burden on affected communities. Moreover, the consultation period coincided with the busiest months of

the year for island residents, who are engaged intensively throughout the visitor season and have limited access to specialist advice during this time. In contrast, the applicant has benefited from years of preparation supported by substantial professional and financial resources, creating an imbalance that disadvantages public contributors.

This imbalance directly conflicts with the standards of effective public participation enshrined in GEN 18 of the National Marine Plan and the principles embodied in the Aarhus Convention. These frameworks require that individuals and communities affected by decisions of this magnitude have a realistic and meaningful opportunity to engage in the process. The conditions under which the island communities have been expected to respond fall short of this required standard. Consequently, the consultation cannot be regarded as genuinely inclusive or adequate in facilitating informed public input. This failure to meet established participation principles diminishes the credibility and transparency of the decision-making process.

Accordingly, it is imperative that Scottish Ministers give careful consideration to these representational concerns when weighing the merits of the application. The deficiencies in public engagement not only diminish trust in the process but also raise serious questions about whether the application has been subject to sufficient scrutiny by those most directly affected. Upholding the standards of effective and equitable public participation is essential to ensuring that any decision taken is both legitimate and justifiable.

The Environmental Impact Assessment submitted with this application fails to provide sufficient information for the Scottish Ministers to make a fully informed decision. While the assessment identifies potential pathways to significant environmental effects across multiple topics, it does not investigate these impacts comprehensively. For example, the landscape assessment’s conclusions rely on a distance-based pattern that is not supported by the methodology set out in its own documentation. Similarly, the heritage assessment lacks demonstrable application of its stated integrity test, and the socio-economic assessment omits any place-based analysis of the affected islands, undermining its robustness. Moreover, the applicant’s dependence on future assessments, post-consent plans, ongoing monitoring, and subsequent approvals does not satisfy the requirements of the EIA Regulations, which mandate that likely significant effects must be understood prior to determination. It is imperative that the Scottish Ministers base their decision on the evidence currently before them, rather than on assumptions that unresolved matters will be adequately addressed at a later stage. Given these deficiencies, the applicant has not demonstrated that the environmental information submitted is adequate for the purposes of this application.

1.1.162 Effects on Local Area

The proposed development encompasses a substantial 448 square kilometre area situated immediately north-west of Islay and west of Colonsay, placing it in close proximity to these islands and their communities. Despite this geographical closeness, the applicant’s assessment predominantly frames Islay solely as a potential project location, neglecting to evaluate its role as an affected island community in its own right. Notably, the Atlantic-facing communities of Islay confront

the nearest edge of the development area directly, yet no place-based appraisal has been undertaken to understand the implications for their local setting, economy, or community life. This omission significantly undermines the reliability of the environmental and heritage impact evaluation, as it fails to address the direct and tangible effects on the people and livelihoods of Islay.

Similarly, for Colonsay and Oronsay, the development's impact is intimately connected to the daily lived experience of these island communities, for whom the seaward outlook toward the array forms a defining element. The North Colonsay and Western Cliffs Special Protection Area, which constitutes Colonsay's own coastline, is central to the applicant's derogation case and compensation plan. This acknowledgment highlights that harm to the internationally protected seabird population inhabiting these cliffs cannot be definitively ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance situated within this community's area, suffers from the same gaps identified in the heritage assessment, particularly regarding the treatment of its open maritime setting. Collectively, these deficiencies demonstrate that the application inadequately addresses the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, calling into question the robustness and credibility of the overall environmental and heritage impact appraisal.

The applicant's Coastal Character assessment recognises the Sound of Iona as an area of high sensitivity, with a direct orientation towards the proposed development site and extensive visibility spanning approximately 21 kilometres. This results in a Moderate and Significant overall effect, with turbines occupying around 39 degrees of the horizon. The West Coast of Iona is similarly identified as highly sensitive, with widespread visibility acknowledged by the applicant, who also accepts that significant effects would arise for residents and visitors across much of the island, including at Dùn Ì, Iona's highest point. Furthermore, the monastic landscape of Iona—comprising the Abbey, the Nunnery and the high crosses—is internationally significant heritage. The applicant's baseline acknowledges the importance of pilgrimage, arrival by sea, and movement through the landscape to this heritage value. Historic Environment Scotland requested additional viewpoints, notably from the ferry crossing itself, yet the applicant failed to provide visualisations from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, thus limiting the thoroughness of the visual impact appraisal.

Beyond the formal assessments, community response further highlights the scale of concern. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal. Notably, habitability—the applicant's own consultants identify it as a potential pathway of effect on the community—was never properly assessed. To illustrate the scale of the turbines' visual dominance, the largest turbines would surpass Ben Hynish on Tiree, a familiar landmark standing at 141 metres and visible from Iona at approximately 33 kilometres, by around 194 metres at roughly two-thirds of that distance. This comparison underscores the likely overwhelming presence of the turbines on the landscape from Iona's vantage points. Taken together, these factors indicate that the applicant's assessment significantly underestimates the scale and significance of visual, community, and heritage impacts on Iona, thereby compromising the accuracy and completeness of the environmental and social impact evaluation.

The applicant's assessment acknowledges significant effects on the Ross of Mull South coastal area, which is identified as having High sensitivity at distances of approximately 22 to 24 kilometres and attributed Medium magnitude. Significant impacts are accepted at Erraid and on the Core Paths of the Ross, as well as at Fionnphort, the gateway to Iona and the primary embarkation point for visitors, where the community is most directly affected by visitor flows. Similarly, across Mull, the applicant recognises significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, which encompasses Mull's western waters and islands and is assessed as High sensitivity throughout at distances of 21 to 33 kilometres, is nonetheless attributed no more than Medium magnitude.

However, this assessment relies heavily on distance-based reasoning, as exemplified by the treatment of the Wilderness and Gribun Rocks coastal area. Here, the applicant concludes that the scale of change is small due to the viewing distance exceeding 30 kilometres, a conclusion that this representation identifies as insufficiently reflective of actual visual and experiential impacts. Crucially, Mull's west-facing tourism economy, which includes wildlife boat operations and the accommodation sector of its western townships, depends fundamentally on the integrity of the Atlantic seascape that the development would industrialise. Despite this, none of these communities has received a place-based assessment tailored to their specific economic and social context.

In summary, the applicant's approach underestimates the significant visual, economic, and community impacts on Mull and Ross of Mull, particularly in relation to designated landscapes and tourism-dependent communities. This omission undermines a full understanding of the effects on these sensitive and economically reliant coastal areas.

The applicant's assessment of impacts on designated seaboard landscapes and island communities notably underestimates or omits significant effects, particularly when compared to the requirements for mitigation and consideration of natural and cultural qualities. For example, although Staffa lies approximately 35 kilometres from the development area—beyond the 30-kilometre range NatureScot recommended for assessing National Scenic Area (NSA) qualities—the applicant concludes that the scale of change there would be small and effects not significant. This conclusion stands despite the applicant's own recognition of Staffa's panoramic maritime qualities, which are integral to its status as one of Europe's most celebrated small islands. Similarly, the Jura NSA, situated around 28 to 32 kilometres away, is assigned a High sensitivity but only a Medium to Low magnitude of impact, justified by distance and retained landforms; yet this contradicts the fundamental basis of its designation, which emphasises the wild, undeveloped character of its Atlantic outlook. The Scarba, Lunga, and the Garvellachs NSA, at 35 to 40 kilometres distance, is treated with the same limited consideration, further evidencing an underestimation of potential effects.

Moreover, the assessment fails to address the specific circumstances of vulnerable island communities such as Ulva, located within the Loch na Keal NSA. Ulva is a community-owned island at the early stages of regeneration, reliant on the very qualities of setting and unspoilt seascape that the development threatens. No

assessment has been made of the potential effects on this small, re-establishing community, despite its close connection to the designated landscape and the importance of preserving its natural and cultural environment for recovery. This omission undermines the protection intended for such communities and overlooks the cumulative impact of changes on their sustainability. Taken together, these deficiencies in the applicant's assessment reveal a significant shortfall in recognising and mitigating effects on both wider designated landscapes and the island communities that depend on their intactness.

The applicant's Environmental Statement assesses the South Tiree coastal area, situated approximately 35 kilometres from the proposed development, as having High sensitivity but attributes a Low magnitude of change to the effects on this landscape. This combination underpins their overall evaluation of the impact on Tiree's coastal character.

However, Tiree's landscape is uniquely defined by its exceptionally low-lying topography, with the highest point, Ben Hynish, reaching only 141 metres. The island's character derives from the dominance of sea and sky and an open oceanic horizon. Introducing turbines of up to 335 metres in height would result in vertical elements unprecedented in the seascape. Such large-scale structures would fundamentally alter the visual and experiential qualities of the landscape.

Given this context, the conclusion of a Low magnitude of change appears to significantly understate the true extent of impact on Tiree's sensitive and distinctive landscape character. This understatement calls into question the reliability of the applicant's assessment, which fails to fully reflect the magnitude of change likely to be experienced by this highly sensitive receptor.

The applicant's reliance on a distance-based approach results in a systematic underestimation and discounting of significant effects on sensitive receptors located beyond 20 kilometres. This methodology leads to the practical consequence that highly sensitive receptors beyond this threshold experience a moderated magnitude of change in the assessment, effectively diminishing the recognised effect. Furthermore, the communities residing in these areas have not been subject to any place-based assessment, leaving their specific circumstances and sensitivities unaddressed. Taken together, these factors undermine the integrity of the environmental impact assessment by failing to adequately recognise and evaluate the full extent of potential impacts on receptors at greater distances. It is therefore concluded that the applicant's approach is insufficient and does not provide a comprehensive or reliable basis for environmental decision-making.

1.1.163 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy requirements applicable to its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the local communities and cultural heritage of this coastal area. However, subsequent analyses of the applicant's documentation reveal that these impacts have been understated. Crucially, the necessary heritage assessment has not been undertaken, and the identified effects on the island communities within the

project’s influence have remained unassessed. Furthermore, the ecological criteria required by law have not been demonstrated as achievable. It is also pertinent to note that only a portion of the project has been submitted for consideration by the Scottish Ministers.

In light of these shortcomings, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to decline the associated marine licence. Should the Ministers determine otherwise, I request that they require the submission of additional environmental information along with enhanced visual representations of the proposal. Moreover, I recommend that the applications be subject to a public inquiry, ensuring that all matters raised in this objection receive thorough examination. Regardless of the outcome, I further request that the Ministers explicitly address and provide clear conclusions in their decision-making on the effects of the proposal on cultural heritage and the island communities affected.

Yours faithfully,

[Redacted]

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

Member of the public 518
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, comprising applications 00012385 and 00012386. These seek consent under section 36 of the Electricity Act 1989 and a marine licence under Part 4 of the Marine (Scotland) Act 2010, respectively, and have been put forward by MachairWind Limited (ScottishPower Renewables). I request that this submission be recorded as an official objection, that I be registered accordingly, and that I am informed of the final determinations made on these applications.

The development in question involves the construction of an offshore wind farm with a generating capacity of approximately 2 gigawatts. It proposes between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip, situated within a Windfarm Development Area spanning around 448 square kilometres. This site lies to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and is in close proximity to the southern Hebrides islands and their coastal communities.

The following exposition details the grounds for objection, rooted firmly in the statutory and policy context governing the determination of these applications. It is incumbent upon the applicant to substantiate, through robust and comprehensive evidence, that all relevant statutory tests and planning policies are met. The onus does not lie with objectors to disprove the application. In this instance, the applicant has failed to meet that evidential burden, and accordingly, consent should be withheld.

1.1.164 Legislative and Policy Framework

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

The marine licence application under Part 4 of the Marine (Scotland) Act 2010 fails to demonstrate compliance with the statutory requirements of Scotland’s National Marine Plan, specifically the General Policies GEN 4, GEN 6, GEN 7, GEN 9, GEN 13, GEN 18, GEN 19, and GEN 21, along with their associated paragraphs. The application lacks sufficient evidence to confirm that the proposal adequately addresses co-existence with other marine users, protects the historic environment, conserves landscape and national scenic areas, safeguards natural heritage,

ensures meaningful engagement, provides sound evidence, and accounts for cumulative impacts. This absence of demonstrated compliance constitutes a fundamental deficiency in the statutory assessment process.

Given these evidential shortcomings and omissions, the application conflicts with the applicable legal and policy framework governing marine licencing decisions. As established, where compliance has not been demonstrated or where deficiencies exist, such matters weigh decisively against the granting of consent. Therefore, the marine licence application should be refused on the grounds that it does not meet the mandatory requirements of the Marine (Scotland) Act 2010 and the National Marine Plan policies.

The applicant's submission acknowledges that National Planning Framework 4 (NPF4) is a significant material consideration and that Policies 3 (Biodiversity), 4 (Natural Places), 7 (Historic Assets and Places), and 11 (Energy) are directly engaged by this proposal. However, the evidence before the determining authority does not demonstrate compliance with these key policies.

NPF4 must be applied alongside relevant statutory duties and legislative requirements, and where compliance is not shown, or where deficiencies, omissions, or conflicts with the legal and policy framework exist, these factors weigh against granting consent. In this case, the applicant has failed to provide sufficient evidence to confirm that the proposal meets the biodiversity objectives of Policy 3, nor has it adequately addressed the protection and enhancement of natural places as required by Policy 4. Similarly, the impact on historic assets and places has not been satisfactorily assessed or mitigated in accordance with Policy 7. Furthermore, the proposal does not demonstrate conformity with Policy 11 concerning energy considerations.

Given these unresolved deficiencies and the absence of demonstrated compliance with the statutory and policy requirements of NPF4, the proposal conflicts with the applicable legal and policy framework. Consequently, these matters must be afforded significant weight against the granting of planning permission.

The applicant's submission must be considered in light of The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which mandate that the likely significant environmental effects of the proposal be identified, assessed, and reported prior to any determination. This statutory requirement ensures that decision-makers have a comprehensive understanding of potential environmental impacts before granting consent.

Furthermore, the Habitats Regulations impose a legal obligation to assess the effects of the proposal on European protected sites in accordance with the applicable statutory tests. This assessment is critical to safeguard designated habitats and species from adverse effects arising from development proposals. The applicant's evidence does not demonstrate compliance with these statutory requirements, leaving a significant gap in the environmental scrutiny necessary for lawful decision-making.

Where compliance with these regulations has not been demonstrated, or where the evidence reveals deficiencies, omissions, or conflicts with the applicable legal and policy framework, such failings must weigh against the granting of consent. In this case, the absence of adequate environmental impact assessment and habitats regulations assessment constitutes a clear failure to meet statutory obligations, thereby justifying refusal of the proposal.

The proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018, resulting in a fundamental procedural deficiency. This statutory requirement is clear that the interests of island communities must be explicitly taken into account and given due weight in the decision-making process. The absence of demonstrated compliance with this duty undermines the legitimacy of the proposal's assessment and decision framework.

The evidence confirms that where compliance with the Islands (Scotland) Act 2018 has not been shown, or where there are identifiable deficiencies, omissions, or conflicts with the applicable legal and policy framework, these shortcomings must weigh against the granting of consent. In this case, the proposal exhibits such deficiencies and omissions, failing to meet the statutory threshold for proper consideration of island community interests. This failure is not a minor procedural oversight but a substantive breach of the statutory duty imposed by the 2018 Act.

Accordingly, the proposal should be refused on the basis that it does not satisfy the legal requirements set out in the Islands (Scotland) Act 2018. The lack of proper consideration and weighting of island community interests constitutes a material conflict with the statutory framework, which decisively weighs against the granting of planning consent. The decision-making authority must uphold the statutory protections afforded to island communities by rejecting this application.

The applicant has failed to discharge the fundamental responsibility to demonstrate compliance with all relevant legal and policy requirements through robust, objective, and proportionate evidence. It is a well-established principle that the evidential burden lies squarely with the applicant to prove that every statutory duty, planning policy, and environmental assessment obligation has been fully satisfied. In this case, the submitted documentation does not meet this essential standard, leaving critical questions of compliance unaddressed.

Moreover, the evidence presented reveals clear deficiencies and omissions that undermine confidence in the proposal's conformity with the applicable legal and policy framework. These shortcomings are not minor or peripheral; they strike at the core of the statutory and policy tests that must be met before consent can be lawfully granted. The absence of demonstrable compliance in these respects is a material consideration that must weigh decisively against the approval of the application.

In light of these failings, the proposal cannot be regarded as having fulfilled the necessary evidential requirements to justify consent. The statutory and policy framework demands certainty and clarity, neither of which has been provided. Consequently, the application should be refused on the basis that the applicant has not met the burden of proof to show lawful and policy-compliant development.

1.1.165 Conflict with National Planning Framework 4 and the Development Plan

There is considerable uncertainty as to whether the current proposal aligns with the impact criteria established by National Planning Framework 4 (NPF4) Policy 11, despite the policy's general support for renewable energy development. It is essential to recognise that this support is contingent upon compliance with specific impact tests, including those relating to communities, landscapes, seascapes, and other sensitive receptors as set out in Policy 11(c), (d), and (e). Without clear evidence demonstrating adherence to these criteria, the proposal's legitimacy under NPF4 is called into question.

Further examination reveals that the proposal is in conflict with these requirements. It would lead to significant adverse effects on nationally designated landscapes and seascapes, an outcome that contradicts the protective intentions of NPF4. Moreover, there is an absence of satisfactory demonstration that the cultural significance of scheduled monuments and their settings would be preserved, a factor critical to maintaining the integrity of the historic environment. The safeguarding of island communities, which Policy 11 seeks to ensure, also remains unproven, adding to the concerns surrounding the proposal.

Finally, the ecological assessments submitted with the proposal fail to provide assurance that the necessary tests can be met, further undermining confidence in its compliance with Policy 11. Taken together, these unresolved issues indicate that the proposal does not meet the comprehensive impact criteria required by NPF4 Policy 11, thereby weakening the policy's intended support for renewable energy developments in this context. It is therefore incumbent upon the decision-making authority to carefully consider these shortcomings before granting consent.

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

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

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

There remains uncertainty as to how the proposal aligns with the terrestrial development plan policies relevant to land-based effects, notably those set out in the Argyll and Bute Local Development Plan 2. It is evident that the proposal would have adverse impacts on the landscape, heritage, and community interests that these policies are designed to protect. This raises significant questions about the consistency of the development with the framework intended to safeguard such valued local characteristics.

In light of this, the proposal stands in conflict not only with the specific provisions of the Local Development Plan but also with the broader objectives of National Planning Framework 4 when considered in its entirety. The applicant has not provided sufficient evidence to dispel these concerns or to demonstrate that the proposal complies with the development plan framework. Consequently, the proposal should be regarded as inconsistent with the relevant terrestrial planning policies.

1.1.166 Seascape, Landscape and Visual Effects

The applicant's assessment methodology lacks a defined distance threshold beyond which major effects are considered to cease, yet evidence indicates a clear pattern: no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of its inherent sensitivity or the extent of visibility. This implicit distance-based moderation is corroborated by the applicant's own documents, which acknowledge that at viewing distances exceeding 30 kilometres, the scale of change is judged as small, and that High magnitude effects are confined to within about 20 kilometres, Medium effects between approximately 20 and 30 kilometres, and Low effects beyond 30 kilometres for certain landscape types. Consequently, the inputs to the protective assessments are systematically understated at precisely the distances where the most sensitive designated landscapes are located, undermining the reliability of the conclusions presented to the Scottish Ministers for their consent decision.

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

While mitigation measures may address certain visual impacts, the introduction of aviation and navigation lighting to a previously unlit sea horizon represents a fundamental and permanent alteration to the night-time seascape character for the full 35-year operational period of the development. This change is not merely a temporary or reversible effect; rather, it signifies a lasting transformation that, in

policy terms, confirms the seascape's suitability for wind farm use. Consequently, consenting to this development entails accepting this enduring impact on the night-time seascape environment.

The proposal's acknowledged effects engage multiple provisions of the National Planning Framework 4, specifically Policies 4(c) and 4(d), Policies 11(d) and 11(e), alongside Policy GEN 7 and paragraph 4.28 of the National Marine Plan. Despite this clear policy relevance, the applicant has failed to demonstrate that its conclusions regarding the scale of these effects align with the methodology it purports to have employed. This shortcoming undermines confidence in the accuracy and reliability of the impact assessments presented. Moreover, the proposal does not evidence compliance with the policies designed to protect nationally important landscapes and seascapes, which are of significant planning and environmental value. In light of these deficiencies, it is concluded that the proposal does not meet the requirements of the key planning policies safeguarding landscape and seascape interests and should therefore be refused.

1.1.167 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of effects on the setting of historic assets is stated to follow Historic Environment Scotland's recognised methodology, which has been developed and refined in consultation with that body. This methodology requires an evaluation of whether changes to the setting affect the contribution that setting makes to the cultural significance of heritage assets, and whether the integrity of the setting is adequately retained. Importantly, it is made clear that visual change alone should not be directly equated with adverse impact.

However, a detailed Methodological Audit, prepared to support community objections and working solely from the applicant's Appendix 14.3, reveals significant shortcomings in how the applicant's assessment has been conducted. While the operational assessment identifies relevant heritage attributes, it fails to demonstrate how the integrity of the setting has been evaluated in accordance with the applicant's own accepted methodology. The assessment focuses primarily on describing visual change—discussing factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—before concluding that the integrity of the setting is adequately retained. Crucially, the Audit finds that the essential evaluative step required by the methodology is absent in all of the examined worked examples.

This omission undermines the reliability of the applicant's conclusions regarding heritage impacts, as the assessment does not adequately apply the prescribed methodological framework to determine whether the setting's contribution to cultural significance is materially affected. Consequently, the assessment's integrity and the robustness of its findings on heritage impacts must be called into question.

The applicant's assessment risks underrepresenting the heritage impacts by not fully capturing the broader cultural landscape and experiential qualities that define the significance of the affected assets. Their own baseline acknowledges that this significance arises from dynamic elements such as pilgrimage, arrival by sea, movement through a living cultural landscape, and the interrelationships between

monuments, spirituality, and the surrounding landscape and seascape, all experienced through movement rather than fixed viewpoints. Furthermore, Historic Environment Scotland's consultation responses, as recorded within the application, explicitly requested additional viewpoints to ensure these wider qualities are adequately represented. Without addressing these concerns, the assessment may fail to reflect the full extent of the heritage impacts.

The practical consequence of relying on the existing landscape assessment is that any understatement of landscape effects directly compromises the reliability of the heritage impact conclusions. If the landscape assessment fails to fully capture the extent or significance of visual or environmental changes, then the subsequent heritage evaluation, which depends upon those landscape findings, will similarly present an incomplete or diminished picture of the true effects on heritage assets. This interdependency means that the heritage conclusions cannot be viewed in isolation but must be critically examined in the context of the preceding landscape analysis.

Furthermore, the heritage conclusions inherit the deficiencies present in the landscape assessment, leading to a systematic understatement of potential harm. Without an accurate and comprehensive landscape assessment, the evaluation of heritage impacts risks overlooking or downplaying adverse effects that may have material significance. Therefore, the credibility of the heritage impact conclusions is fundamentally undermined by the shortcomings in the landscape assessment, calling into question the robustness of the overall appraisal as it currently stands.

There remains significant uncertainty regarding the application's compliance with essential policy requirements for heritage protection. Specifically, the proposal engages National Planning Framework 4 (NPF4) Policy 7(h) concerning scheduled monuments, alongside Policies 7(c) and 7(d) relating to setting, as well as GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Despite these clear policy frameworks, the applicant has failed to demonstrate that the cultural significance of internationally and nationally important heritage assets, together with their settings, will be adequately protected. Crucially, Scottish Ministers have not been provided with the necessary assessment to support such a conclusion. This lack of robust evidence undermines confidence in the application's acceptability and weighs against its approval.

1.1.168 Effects on Island Communities, Tourism and the Local Economy

There is considerable uncertainty regarding the potential impacts of the proposed development on the island communities in question, particularly given their unique economic and social contexts. These communities rely heavily on a visitor economy that is intimately connected to specific environmental and cultural qualities. The applicant's own baseline assessments identify these attributes as landscape, seascape, cultural heritage, tranquillity and remoteness. Any alteration to these qualities, therefore, poses a substantial risk to the fundamental appeal that attracts visitors to the islands.

The significance of these qualities extends beyond mere aesthetics; they form the cornerstone of the local economy. The island communities depend to an exceptional

degree on visitors drawn by these distinctive features. If the proposal were to diminish the integrity or experience of these characteristics, the resulting effect would be a direct strike at the economic base of these communities. This, in turn, threatens not only business viability but also the maintenance of essential local services, population retention and the long-term sustainability of community life.

Given the centrality of the visitor-attracted qualities to both economic and social sustainability, any development that risks impacting them must be subject to rigorous scrutiny. The evidence indicates a clear and direct link between these qualities and the ongoing viability of the island communities. Accordingly, the potential for adverse effects should weigh heavily in the consideration of the proposal, underscoring the need for a cautious and comprehensive assessment before any approval is granted.

The practical consequence of the applicant's approach is a fundamental underestimation of the potential socio-economic impacts on island communities directly affected by the proposal. While the applicant's consultants acknowledge habitability as a significant pathway for impact, no specific assessment of the habitability of these islands has been undertaken. Instead, the socio-economic assessment in Chapter 18 focuses primarily on regional port communities with detailed analysis, neglecting an equivalent, place-based assessment of the island communities themselves. Despite this lack of focused analysis, the assessment nonetheless concludes that these island communities exhibit low sensitivity to tourism effects, a conclusion that lacks substantive evidential basis.

This conclusion fails to recognise the unique economic characteristics of small island communities, which cannot be accurately represented by regional averages. Island economies are typically concentrated in sectors highly sensitive to changes in the environmental qualities that attract visitors. Moreover, an increasing dependence on visitor numbers intensifies, rather than mitigates, this sensitivity. Without place-specific analysis, the assertion of low sensitivity amounts to an unsubstantiated assumption rather than evidence-based reasoning. Consequently, the socio-economic assessment methodology is flawed and insufficient to properly understand or mitigate the impacts on the island communities facing the development.

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

Moreover, the applicant has acknowledged that island communities warrant particular scrutiny but has failed to conduct the necessary assessment to understand the potential effects on these communities. There is no demonstrated evidence that the proposal is compatible with the principles of sustainable island communities, nor

that the statutory duties owed to these communities have been adequately discharged. Given this shortfall, it is clear that the proposal does not meet the required standards for assessing and protecting island communities as mandated by current policy and legislation. Consequently, the proposal should not be approved in its current form.

1.1.169 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, with surrounding waters that support notable populations of seabirds, marine mammals, and basking sharks. The proposed project would bring construction, operational, and decommissioning activities on a very large scale, extending over several decades, thereby introducing sustained pressures on these ecologically sensitive environments.

Given the recognised ecological importance and sensitivity of the site and its adjacent marine habitats, the potential for significant adverse environmental effects from the development is substantial. The presence of protected species and priority features necessitates careful consideration of the impacts that such large-scale and long-term activities may impose on biodiversity and habitat integrity.

The applicant’s submission of a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan has practical consequences for the assessment of the proposed development. These documents acknowledge the potential for adverse effects on the guillemot population within the North Colonsay and Western Cliffs Special Protection Area, signalling that the applicant does not categorically rule out impacts on the site’s integrity. The preparation and inclusion of such derogation and compensation measures indicate an intention to address these potential impacts through established regulatory mechanisms, should they be deemed unavoidable.

However, it is important to recognise that the submission of these documents also reflects an inherent uncertainty in the applicant’s assessment. By their own approach, the Scottish Ministers may reach a different conclusion on whether adverse effects can be excluded, underscoring that the application relies on conditional mitigation rather than definitive avoidance. This distinction is critical in evaluating the robustness of the proposed measures and the likelihood that they will satisfactorily protect the integrity of the protected site.

Mitigation, compensation proposals, and future monitoring, while important considerations, do not in themselves satisfy the rigorous evidential requirements mandated by the Habitats Regulations. Consent for developments affecting protected habitats may only be lawfully granted when it is ascertained beyond reasonable scientific doubt that the integrity of the protected site will not be adversely affected. This high standard places the burden squarely on the applicant to demonstrate unequivocally that statutory tests are met, and mere reliance on mitigation measures cannot substitute for the necessary certainty demanded by law.

This stringent legal framework is reinforced through multiple policy instruments, including the Habitats Regulations, GEN 9 and GEN 13 of the National Marine Plan,

and National Planning Framework 4 Policies 3, 4(b), 4(e), and 4(f). Together, they impose a strict control regime to ensure that any consent granted aligns with these protective requirements. Consequently, decision-makers must be satisfied that no reasonable scientific doubt remains before granting consent, thereby upholding the integrity of protected sites and adhering to established national policy standards.

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

1.1.170 Cumulative and In-Combination Effects

The current assessment process for the project fails to provide a comprehensive evaluation of its environmental and operational impacts, as only a portion of the development—the wind farm itself—is before the Scottish Ministers. Crucially, key components such as the export cable corridor and onshore transmission works, which are essential for the wind farm's operation, are deferred to separate future applications. This fragmented approach precludes a full understanding of the cumulative effects, as the necessary infrastructure enabling the project's function is excluded from the initial consent. Consequently, significant impacts are deferred to subsequent consenting stages, limiting the ability of decision-makers to consider the project's totality at once.

This method of piecemeal assessment is inconsistent with established legal principles, notably those upheld in Raeshaw Farms, which emphasise that a project must be evaluated in its entirety rather than divided into smaller segments to minimise apparent individual effects. By salami-slicing the development into separate parts, the assessment undermines the procedural requirement for holistic scrutiny and risks overlooking cumulative impacts that could influence the overall acceptability of the proposal. Therefore, the current approach is procedurally and legally flawed, and it is imperative that the full scope of the project, including all integral elements, is assessed together to ensure a robust and lawful decision-making process.

The proposed mitigation measures outlined in the Environmental Impact Assessment must be carefully weighed against the baseline from which cumulative effects are assessed. However, the cumulative impact assessment relies heavily on the conclusions of the landscape, heritage, and socio-economic evaluations conducted earlier in the report. Given that these foundational assessments appear to understate certain effects, the effectiveness of mitigation cannot be fully appreciated without addressing this initial shortfall.

It is important to recognise that the cumulative assessment effectively compounds any underestimation present in the underlying baseline. If the baseline itself minimises impacts, then the aggregation of this proposal with other existing, consented, and foreseeable developments will similarly reflect an artificially reduced

scale of combined effects. This means the true cumulative impact on landscape character, heritage assets, and local socio-economic conditions may be significantly greater than reported.

Therefore, the cumulative effects assessment as presented is unreliable and does not provide a robust foundation for decision-making. Until the initial landscape, heritage, and socio-economic assessments are revisited to ensure accurate representation of impacts, the cumulative assessment cannot be considered a sound basis for concluding that the combined effects of development will be acceptable. Further scrutiny and refinement are necessary to establish a realistic understanding of cumulative impacts.

Failure to adequately assess the cumulative and in-combination effects of the proposed development, including deferred works, risks non-compliance with essential planning policies and environmental regulations. Specifically, the proposal does not satisfy the requirements set out in GEN 21 and paragraph 4.85 of the National Marine Plan, nor does it adhere to NPF4 Policy 11(e) and the Environmental Impact Assessment (EIA) Regulations concerning project splitting. The applicant has not demonstrated that the full scope of effects associated with the project as a whole has been reliably identified and assessed. Consequently, it is imperative that the determination explicitly addresses the treatment of the deferred works to ensure compliance and a robust decision-making process.

1.1.171 Public Engagement, Site Selection and Environmental Information

While the applicant requests that Scottish Ministers place significant weight on the site-selection process, it is essential to consider the shortcomings in public participation that undermine its legitimacy. The consultation period coincided with the busiest months for island communities, when residents are occupied with continuous work throughout the visitor season and access to specialist advice is limited. This timing contrasts sharply with the applicant’s extended preparation period, which has benefited from substantial professional and financial resources. Consequently, the affected communities have not been afforded a comparable opportunity to engage meaningfully with the extensive technical material submitted, which runs to many thousands of pages.

The principles enshrined in GEN 18 of the National Marine Plan, alongside those of the Aarhus Convention, explicitly require that affected parties have a realistic chance to participate in decisions of this significance. The conditions under which communities have been expected to respond clearly fall short of this standard. It is therefore imperative that Ministers take these deficiencies in public participation seriously when considering the representations made, recognising that the consultation process as conducted does not meet the required standards of effective engagement.

The Environmental Impact Assessment submitted is insufficient to enable the Scottish Ministers to make an informed decision on the application. While the assessment covers a range of topics, it identifies potential significant effects without fully investigating them or employing methodologies that substantiate its conclusions. For instance, the landscape assessment presents outcomes based on a distance

pattern not supported by its own stated methodology; the heritage assessment fails to demonstrate application of its integrity test; and the socio-economic assessment lacks any place-based analysis pertinent to the affected islands. Furthermore, the application frequently defers critical evaluation to future stages—post-consent plans, monitoring, and additional approvals—which does not satisfy the requirement under the EIA Regulations to understand likely significant effects prior to determination. It is imperative that the Scottish Ministers base their decision on the evidence currently before them, rather than on assumptions that outstanding issues will be adequately resolved later. Consequently, the applicant has not demonstrated that the environmental information provided meets the necessary adequacy standard.

1.1.172 Effects on Local Area

The applicant's assessment acknowledges Islay and Colonsay as the closest islands to the proposed development, which lies immediately north-west of Islay and west of Colonsay. However, the evaluation primarily considers Islay in terms of its potential as a direct project location rather than as an affected island community in its own right. This approach overlooks the Atlantic-facing communities of Islay, which confront the nearest edge of a 448 square kilometre development area, without any place-based assessment of the impacts on their setting, economy, or community life. For Colonsay and Oronsay, the seaward outlook that is central to daily life directly faces the proposed array. Notably, the North Colonsay and Western Cliffs Special Protection Area forms Colonsay's coastline and is the focus of the applicant's derogation case and compensation plan, implicitly recognising that harm to the internationally protected seabird population there cannot be ruled out. Furthermore, Oronsay Priory—a scheduled monument of national importance—lies within this community's area, yet the identified deficiencies in the heritage assessment equally apply to the evaluation of its open maritime setting. Taken together, these points demonstrate that the applicant's assessment underestimates the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby undermining the reliability of the overall environmental and heritage impact evaluation.

The applicant's Coastal Character assessment recognises the Sound of Iona as an area of high sensitivity, with a direct orientation towards the proposed development site and extensive visibility spanning approximately 21 kilometres. This results in a Moderate and Significant overall effect, with turbines occupying around 39 degrees of the horizon. The West Coast of Iona is similarly identified as highly sensitive, with widespread visibility acknowledged by the applicant, who also accepts that significant effects would arise for residents and visitors across much of the island, including at Dùn Ì, Iona's highest point. Furthermore, the monastic landscape of Iona—comprising the Abbey, the Nunnery and the high crosses—is internationally significant heritage. The applicant's baseline acknowledges the importance of pilgrimage, arrival by sea, and movement through the landscape to this heritage value. Historic Environment Scotland requested additional viewpoints, notably from the ferry crossing itself, yet the applicant failed to provide visualisations from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, thus limiting the thoroughness of the visual impact appraisal.

Beyond the formal assessments, community response further highlights the scale of concern. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal. Notably, habitability—the applicant's own consultants identify it as a potential pathway of effect on the community—was never properly assessed. To illustrate the scale of the turbines' visual dominance, the largest turbines would surpass Ben Hynish on Tiree, a familiar landmark standing at 141 metres and visible from Iona at approximately 33 kilometres, by around 194 metres at roughly two-thirds of that distance. This comparison underscores the likely overwhelming presence of the turbines on the landscape from Iona's vantage points. Taken together, these factors indicate that the applicant's assessment significantly underestimates the scale and significance of visual, community, and heritage impacts on Iona, thereby compromising the accuracy and completeness of the environmental and social impact evaluation.

While the applicant acknowledges significant effects on certain locations such as Erraid, Core Paths of the Ross of Mull, and Fionnphort—the latter being the gateway to Iona and a key point for visitor embarkation—the mitigation measures proposed do not fully address the broader and more profound impacts on Mull and Ross of Mull's coastal communities and landscapes. The Ross of Mull South coastal area, assessed as having High sensitivity at distances of approximately 22 to 24 kilometres and attributed only Medium magnitude of impact, exemplifies this insufficient recognition of harm. Similarly, although the Loch na Keal National Scenic Area is identified as of High sensitivity across a range of 21 to 33 kilometres, the applicant restricts the attributed magnitude to Medium, a conclusion that appears inconsistent with the area's significance.

The applicant's reliance on distance to downplay effects is further illustrated by the assessment of the Wilderness and Gribun Rocks coastal area, where impacts are judged small due to viewing distances exceeding 30 kilometres. This distance-based approach underestimates the visual and experiential intrusion on sensitive landscapes. Crucially, Mull's west-facing tourism economy, including wildlife boat operations and accommodation in western townships, depends on the unspoiled Atlantic seascape that the proposed development would industrialise. None of these communities has been provided with a place-based assessment, leaving a significant gap in understanding the economic and social consequences.

In summary, the applicant's assessment inadequately addresses the significant visual, economic, and community impacts on Mull and Ross of Mull. The reliance on distance to mitigate perceived effects and the absence of detailed, location-specific analysis fail to reflect the true magnitude of harm to designated landscapes and tourism-dependent communities.

The applicant's assessment of the impacts on wider seaboard designated landscapes and island communities appears to underestimate significant effects, particularly when compared to the mitigation standards typically applied to sensitive areas. For instance, Ulva, a community-owned island within the Loch na Keal National Scenic Area, is at the outset of its regeneration and relies heavily on the unspoilt seascape and setting, qualities that remain unassessed in the application despite being integral to the island's recovery. Similarly, Staffa, one of Europe's most celebrated small islands and also within the Loch na Keal National Scenic Area, lies

approximately 35 kilometres from the development. This exceeds the 30 kilometre assessment boundary suggested by NatureScot, yet the applicant concludes the effects there would be small and not significant, even though their own evaluation acknowledges the panoramic maritime qualities of the location.

Further, the Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed with High sensitivity at a distance of 28 to 32 kilometres but is attributed only Medium to Low magnitude of effect, justified by distance and retained landforms. This approach is similarly applied to the Scarba, Lunga and the Garvellachs National Scenic Area, situated approximately 35 to 40 kilometres away. Such treatment fails to adequately reflect the intrinsic qualities that underpin these designations. Taken together, these assessments omit the full extent of potential impacts on the natural and cultural qualities of these designated landscapes and the vulnerable island communities that depend on them, thereby undermining their protection and the integrity of the wider seaboard environment.

The applicant's assessment assigns a Low magnitude of change to the South Tiree coastal area despite recognising it as a receptor of High sensitivity at a distance of approximately 35 kilometres. This characterization is inconsistent with the exceptional sensitivity of Tiree's landscape, which is notably defined by its low-lying topography and expansive seascape. When compared to other locations where vertical structures have been introduced, the assessment's mitigation considerations appear insufficient to justify such a modest magnitude of change in this context.

Tiree's distinctive landscape character is fundamentally shaped by the dominance of sea and sky, with its highest elevation at Ben Hynish reaching only 141 metres. The introduction of turbines up to 335 metres in height represents vertical elements unprecedented within this open oceanic horizon. This scale of intervention would significantly alter the visual and experiential qualities of the island's seascape. Accordingly, the conclusion of a Low magnitude of change for such a sensitive and exposed receptor markedly understates the effects and results in an unreliable evaluation of impacts on Tiree's landscape character.

The applicant's assessment fails to address the significant effects on key mainland and island communities that have direct visual and economic ties to the seascape in question. For instance, Gigha, a community-owned island renowned nationally for its successful regeneration, faces the development site from the east. The impact on this delicate community and its economy, which relies heavily on its maritime setting, has been entirely overlooked. Similarly, Ardnamurchan Point—the westernmost tip of the British mainland—offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward vistas are precisely the types of receptors that the applicant's distance-based mitigation approach purports to moderate, yet the assessment does not adequately consider their value or sensitivity.

Furthermore, the west coast of Kintyre comprises a series of communities whose identity, character and visitor economies are fundamentally shaped by the open Atlantic seaboard vistas towards Islay, Jura and the surrounding waters. The Treshnish Isles and other nearby small islands and mainland coasts that overlook the development area share this visual and economic reliance. By neglecting to

assess the potential effects on these interconnected communities and landscapes, the applicant's evaluation lacks comprehensiveness and fails to provide a robust basis for decision-making. This omission calls into question the reliability of the conclusions drawn and highlights a need for a more thorough and inclusive assessment.

The applicant's reliance on a distance-based approach to assess environmental effects results in a systematic underestimation and discounting of significant impacts on sensitive receptors located beyond 20 kilometres from the development site. This methodological choice has a practical consequence: important changes experienced by these distant communities are not given appropriate weight in the environmental impact assessment. Consequently, the assessment does not accurately reflect the true extent or significance of effects that occur beyond this arbitrary distance threshold.

In examining the evidence, it becomes clear that wherever the applicant's assessment encounters a highly sensitive receptor beyond approximately 20 kilometres, the magnitude of change is deliberately moderated and the effect discounted. This means that although these receptors may be affected to a considerable degree, the assessment process effectively diminishes their experience of impact. Such an approach fails to provide a comprehensive or place-specific analysis for these communities, thereby compromising the assessment's integrity and robustness.

The absence of a place-based assessment for communities beyond 20 kilometres undermines the environmental impact assessment's ability to fully inform decision-makers and the public. Without acknowledging and properly evaluating the effects experienced by these sensitive receptors, the applicant's approach risks overlooking meaningful environmental and social consequences. It is therefore essential that the assessment methodology be revised to accurately capture and weigh the significance of effects at all relevant distances, ensuring a thorough and credible evaluation.

1.1.173 Summary

The proposal for the MachairWind Offshore Wind Farm fails to meet the statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges substantial impacts upon nationally designated landscapes, as well as on the coastal communities and their heritage. However, published analyses of the applicant's documentation reveal that these impacts have been underestimated. Furthermore, the necessary heritage assessment has not been undertaken, and although the effects on the island communities have been identified, they remain unassessed. The ecological criteria set forth have not been demonstrated as achievable, and it is important to note that only a portion of the project is currently under consideration by the Scottish Ministers.

In light of these shortcomings, it is respectfully submitted that the Scottish Ministers should refuse consent for the MachairWind Offshore Wind Farm and decline to grant the associated marine licence. Should the Ministers consider not refusing the application outright, it is requested that they require the submission of additional

environmental information and enhanced visualisations. Moreover, it is urged that the application be decided only subsequent to a public inquiry, thereby allowing a thorough examination of the issues raised in this objection.

Irrespective of the outcome, it is further requested that the Scottish Ministers explicitly address and articulate their conclusions regarding the impacts on cultural heritage and the affected island communities within their decision-making rationale.

Yours faithfully,

[Redacted]

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

Member of the public 519
Dear Sir/Madam,

I hereby register my formal objection to the MachairWind Offshore Wind Farm proposals, submitted under application numbers 00012385 for consent pursuant to section 36 of the Electricity Act 1989, and 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. These applications, put forward by MachairWind Limited (ScottishPower Renewables), seek approval for a substantial offshore wind energy development.

The proposed project entails constructing an offshore wind farm with a generating capacity of approximately 2 gigawatts. The development would encompass between 91 and 144 turbines, each reaching heights of up to 335 metres to blade tip. The site is located within a designated Windfarm Development Area spanning roughly 448 square kilometres of sea situated north-west of Islay and west of Colonsay. This location lies approximately 21 kilometres from Iona and is in close proximity to various islands and coastal communities within the southern Hebrides.

My objection is grounded in detailed planning and environmental considerations, evaluated within the relevant statutory and policy frameworks that govern these applications. It is important to emphasise that the responsibility lies entirely with the applicant to provide sufficient evidence demonstrating that all relevant statutory and policy tests have been met. Objectors, such as myself, are not required to prove the contrary. Upon careful review, it is apparent that the applicant has failed to discharge this burden adequately. Consequently, the applications should be refused consent. I request that I be formally recorded as an objector and informed of the outcome of the decision-making process.

1.1.174 Seascape, Landscape and Visual Effects

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

1.1.175 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.

1.1.176 Effects on Island Communities, Tourism and the Local Economy

There is considerable uncertainty regarding the potential impacts of the proposed development on the fundamental economic and social sustainability of the island communities in question. These communities exhibit an exceptional degree of dependence on visitors, whose presence is closely tied to the intrinsic qualities of the islands. The applicant's own baseline assessments identify these qualities as including landscape, seascape, cultural heritage, tranquillity and remoteness.

Any alteration to these defining characteristics poses a direct threat to the economic foundations of the island communities. Given that the visitors are drawn specifically by these attributes, changes affecting them could undermine the very reasons for tourism and visitation. This, in turn, risks destabilising the local economy which supports not only businesses but also essential services, infrastructure and employment opportunities within these communities.

The potential consequences extend beyond economic considerations to touch upon the social fabric and long-term viability of the islands' populations. If the qualities that attract visitors are compromised, there is a real danger that the communities' ability to sustain themselves will be jeopardised. It is therefore imperative to approach the proposal with caution, recognising the significant uncertainties surrounding its effects on the islands' unique and delicate balance.

The applicant's own consultants acknowledged that habitability represents a potentially significant pathway through which the proposal could affect island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 focuses predominantly on regional-level analysis, giving detailed consideration to potential port communities while failing to conduct an equivalent place-based evaluation of the island communities directly facing the development. Nevertheless, the assessment concludes that these island communities exhibit low sensitivity to tourism effects.

It is important to recognise that small island economies cannot be adequately represented by regional averages. Their economic structures are often concentrated in sectors that are directly vulnerable to alterations in the environmental and social qualities that attract visitors. Rather than diminishing sensitivity, reliance on increasing visitor numbers tends to deepen these communities' dependence on the qualities that may be at risk from the proposal. Therefore, concluding low sensitivity without a tailored place-based analysis does not constitute robust evidence but instead amounts to an unsubstantiated assumption.

Given these considerations, the socio-economic assessment's methodology appears fundamentally flawed and insufficient to fully understand or mitigate the impacts on island communities. A more nuanced, locality-specific approach is necessary to capture the true nature of potential effects and to inform appropriate planning decisions. Without this, the assessment risks overlooking significant socio-economic vulnerabilities inherent to these island settings.

There remains significant uncertainty regarding the proposal's compliance with the necessary policy and statutory duties relating to island communities. This uncertainty stems from a failure to provide the robust socio-economic evidence required by GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions affecting such communities must rest on sound evidence and adopt a precautionary approach where data is lacking. Furthermore, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 explicitly require that the interests of island communities be thoroughly assessed and given due weight through meaningful engagement from the earliest stages of a project through to its conclusion. In this case, the applicant acknowledged the need for particular scrutiny of island communities but has not undertaken the comprehensive assessment necessary to understand the proposal's effects upon them. Consequently, it has not demonstrated that the development is compatible with the sustainability of these communities, nor has it shown that the statutory duties owed to them have been properly discharged. Given these deficiencies, the proposal fails to meet the required planning and statutory standards for the protection and consideration of island communities.

1.1.177 Ecology, Biodiversity and Habitats Regulations

The evidence submitted by the applicant clearly identifies that the development area encompasses Priority Marine Features and Annex I habitats, demonstrating the site's high ecological value. These designated features are critical components of the marine environment, indicating habitats that are rare, sensitive, or otherwise of significant conservation importance. Moreover, the surrounding waters provide essential habitat for a variety of protected species, including seabirds, marine mammals, and the basking shark, all of which are recognised for their vulnerability and conservation status. The presence of such species and habitats within and adjacent to the development footprint underscores the intrinsic ecological sensitivity of the area and elevates the potential risk profile associated with any substantial anthropogenic disturbance.

Given the scale and duration of the proposed development, which entails construction, operation, and decommissioning activities extending over several decades, there exists a considerable potential for significant adverse environmental effects. The introduction of large-scale industrial activity into this ecologically important marine environment could disrupt habitat integrity, disturb protected species, and degrade the overall biodiversity value of the site. The prolonged nature of the development phases further amplifies the risk of cumulative and long-term impacts. Consequently, careful consideration must be given to the potential environmental consequences, and robust mitigation measures will be essential to avoid or minimise harm to these Priority Marine Features and protected species. Without such safeguards, the proposal poses a substantial threat to the conservation objectives associated with this sensitive marine ecosystem.

The evidence submitted, including the applicant's own derogation documents, clearly indicates that the statutory tests designed to protect internationally important habitats and species have not been satisfied. This lack of demonstration undermines the fundamental legal requirements that must be met before consent can be granted.

Given the nature of the ecological features involved and the statutory protections afforded to them, it is imperative that any proposal affecting such sites conclusively addresses these tests. The applicant's failure to provide the necessary certainty compromises the integrity of the assessment process and raises significant concerns about potential harm to these protected assets.

In light of the above, it is concluded that the application does not comply with the requisite statutory obligations. Therefore, the case for granting consent is not made out, and the application should be refused.

1.1.178 Cumulative and In-Combination Effects

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

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

The cumulative impact assessment fails to accurately represent the true extent of combined effects, as it relies on baseline evaluations that have themselves understated key impacts. Specifically, the landscape, heritage, and socio-economic assessments underpinning the Environmental Impact Assessment adopt a reduced baseline, which consequently skews the cumulative appraisal. This methodological flaw means that when the proposed development is considered alongside existing, consented, and foreseeable projects, the aggregate effects are systematically minimized. Therefore, the cumulative assessment cannot be regarded as reliable, as it underestimates the overall magnitude of harm likely to result from the combined developments. In conclusion, the cumulative effects have been understated due to flawed baseline assessments, undermining the credibility of the Environmental Impact Assessment and necessitating a reassessment to ensure informed and robust planning decisions.

1.1.179 Public Engagement, Site Selection and Environmental Information

While mitigation measures may address certain environmental concerns, the fundamental deficiencies in public participation and consultation timing critically undermine the legitimacy of the site-selection process. The applicant requests that

Scottish Ministers place significant weight on this process; however, the quality of public engagement throughout both the plan and site-selection stages has been inadequate and has persisted into the application phase. The application itself consists of thousands of pages of technical material, yet the consultation period was scheduled during the busiest months for island communities—when residents are occupied with continuous work throughout the visitor season and access to specialist advice is limited. This contrasts sharply with the applicant's extensive preparation time, supported by substantial professional and financial resources. National Marine Plan policy GEN 18 and the principles of effective public participation, as enshrined in the Aarhus Convention, mandate that those affected must have a realistic opportunity to engage in decisions of this scale. The conditions imposed on the affected communities have fallen short of this standard, and Ministers are urged to consider this firmly when evaluating the representations submitted.

There remains considerable uncertainty regarding the sufficiency of the Environmental Impact Assessment submitted with this application. While the assessment is extensive in scope, its adequacy is questionable, as it identifies potential pathways to significant effects but fails to investigate them thoroughly. For example, the landscape assessment employs a methodology that does not align with the outcomes presented, notably applying a distance pattern not supported by its own framework. Similarly, the heritage assessment lacks demonstration of its own integrity test's application, and the socio-economic assessment omits a place-based analysis of the islands affected. These methodological shortcomings undermine the reliability of the conclusions drawn.

Moreover, the reliance on future assessment, post-consent plans, monitoring, and additional approvals does not satisfy the requirements of the Environmental Impact Assessment Regulations, which stipulate that likely significant effects must be understood before determination. The Scottish Ministers are compelled to decide based on the evidence currently available, rather than on the expectation that unresolved issues will be addressed satisfactorily at a later stage. The applicant has not demonstrated that the environmental information provided is adequate for informed decision-making, and as such, the application should not be approved in its present form.

1.1.180 Effects on Local Area

The proposed development area encompasses 448 square kilometres immediately northwest of Islay and west of Colonsay, placing these islands—and the neighbouring island of Oronsay—within direct and substantial proximity to the project. Despite this, the applicant's assessment inadequately addresses the significant effects on these communities, particularly by considering Islay primarily as a potential project location rather than evaluating its status as an affected island community in its own right. The Atlantic-facing communities of Islay, which face the nearest edge of the development area, receive no place-based assessment of the impacts on their local setting, economy, or community life. For Colonsay and Oronsay, the situation is equally concerning. The seaward outlook that shapes daily life on these islands directly faces the development array, with the North Colonsay and Western Cliffs Special Protection Area—part of Colonsay's own coastline—subject to the applicant's derogation case and compensation plan. This represents a

clear admission that harm to the internationally protected seabird population of these cliffs cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance situated within this community's area, is inadequately considered, with the same identified gaps in the heritage assessment applying fully to the treatment of its open maritime setting. Taken together, these factors demonstrate a fundamental underassessment of the direct and significant effects on Islay, Colonsay, and Oronsay, undermining the reliability of the environmental and heritage impact evaluation presented.

The applicant's own Coastal Character assessment acknowledges the Sound of Iona as an area of high sensitivity, directly oriented towards the proposed development, with extensive visibility and a large geographical extent of change. The assessment identifies a Moderate and Significant overall effect at approximately 21 kilometres, with turbines spanning roughly 39 degrees of the horizon. Similarly, the West Coast of Iona is recognised as highly sensitive with widespread visibility, and the applicant concedes significant effects on residents and visitors across much of the island, including at Dùn Ì, Iona's highest point.

Iona's monastic landscape, encompassing the Abbey, the Nunnery, and the high crosses, is of international heritage importance. The applicant's baseline identifies pilgrimage, sea arrival, and movement through the landscape as central to this significance. Historic Environment Scotland requested additional viewpoints, notably from the ferry crossing itself; however, no visualisation has been provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, a notable omission given the cultural context.

A household consultation on Iona revealed that 92 per cent of respondents object to the proposal, yet the applicant's own consultants identified habitability as a potential pathway of effect on this community—a factor that remains unassessed. To further contextualise the scale of the impact, the turbines would exceed the height of Ben Hynish on Tiree (141 metres high and visible from Iona at approximately 33 kilometres) by about 194 metres, despite being situated roughly two-thirds of that distance away.

Taken together, these points demonstrate that the applicant's assessment underestimates the scale and significance of visual, community, and heritage impacts on Iona, thereby compromising the accuracy of the environmental and social impact evaluation.

The applicant's assessment notably relies on distance-based mitigation in addressing the visual impacts on Mull and Ross of Mull coastal communities and landscapes, yet this approach inadequately reflects the true extent of significant effects experienced locally. For instance, although the Ross of Mull South coastal area is acknowledged as having High sensitivity at distances of approximately 22 to 24 kilometres and is attributed Medium magnitude effects, the applicant concedes significant impacts at Erraid, on the Core Paths of the Ross, and at Fionnphort—the key gateway to Iona and the principal embarkation point for visitors. This community is intrinsically linked to visitor flows, yet the assessment does not extend to a place-based evaluation of its social and economic vulnerabilities. Similarly, across Mull, significant effects are accepted on Core Paths and within the Central, South and

West Mull Local Landscape Area, and the Loch na Keal National Scenic Area, which is of High sensitivity between 21 and 33 kilometres, is nonetheless attributed no more than Medium magnitude. The applicant's characterisation of the Wilderness and Gribun Rocks area, where the scale of change is deemed small due to viewing distances exceeding 30 kilometres, further exemplifies an over-reliance on distance as a mitigating factor rather than a nuanced, site-specific analysis.

This distance-centric assessment framework fails to capture the profound implications for Mull's west-facing tourism economy, which is heavily reliant on the unspoiled Atlantic seascape that the proposed development would fundamentally industrialise. The wildlife boat operations and accommodation sectors supporting the western townships are intimately connected to this landscape quality, yet no dedicated place-based assessments have been conducted for these communities. The absence of such evaluations undermines the understanding of the cumulative and localized economic and community impacts that would arise. In summary, the applicant's assessment inadequately accounts for the significance of visual, economic, and community effects on highly sensitive landscapes and tourism-dependent populations, thereby failing to provide a comprehensive or balanced appraisal of the proposal's true consequences for Mull and Ross of Mull.

The applicant's assessment of impacts on designated seaboard landscapes and island communities notably underestimates or omits significant effects, particularly when compared to the requirements for mitigation and consideration of natural and cultural qualities. For example, although Staffa lies approximately 35 kilometres from the development area—beyond the 30-kilometre range NatureScot recommended for assessing National Scenic Area (NSA) qualities—the applicant concludes that the scale of change there would be small and effects not significant. This conclusion stands despite the applicant's own recognition of Staffa's panoramic maritime qualities, which are integral to its status as one of Europe's most celebrated small islands. Similarly, the Jura NSA, situated around 28 to 32 kilometres away, is assigned a High sensitivity but only a Medium to Low magnitude of impact, justified by distance and retained landforms; yet this contradicts the fundamental basis of its designation, which emphasises the wild, undeveloped character of its Atlantic outlook. The Scarba, Lunga, and the Garvellachs NSA, at 35 to 40 kilometres distance, is treated with the same limited consideration, further evidencing an underestimation of potential effects.

Moreover, the assessment fails to address the specific circumstances of vulnerable island communities such as Ulva, located within the Loch na Keal NSA. Ulva is a community-owned island at the early stages of regeneration, reliant on the very qualities of setting and unspoilt seascape that the development threatens. No assessment has been made of the potential effects on this small, re-establishing community, despite its close connection to the designated landscape and the importance of preserving its natural and cultural environment for recovery. This omission undermines the protection intended for such communities and overlooks the cumulative impact of changes on their sustainability. Taken together, these deficiencies in the applicant's assessment reveal a significant shortfall in recognising and mitigating effects on both wider designated landscapes and the island communities that depend on their intactness.

The applicant's assessment that the South Tiree coastal area, situated approximately 35 kilometres from the proposed development, would experience only a Low magnitude of change fails to acknowledge the practical consequences for the island's landscape character. Given the High sensitivity attributed to this receptor, this conclusion significantly understates the actual impact, leading to an unreliable evaluation of effects.

Tiree's landscape is uniquely defined by its exceptionally low-lying topography and the dominance of sea and sky. With its highest elevation at Ben Hynish reaching merely 141 metres, the island's character depends heavily on an uninterrupted open oceanic horizon. The introduction of turbines up to 335 metres tall would create vertical structures unprecedented in this seascape, fundamentally altering the visual experience and character of Tiree's environment.

This marked contrast between the island's natural landscape and the scale of the proposed turbines demonstrates that the assessment's Low magnitude rating is inappropriate. A more robust evaluation is necessary to accurately reflect the significance of the change and to ensure that the distinctive qualities of Tiree's landscape are properly considered in decision-making.

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

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

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

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

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

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

1.1.181 Personal Observations

In addition to the planning matters above, I am personally concerned because: The Hebrides are among the most beautiful and unspoilt landscapes in Europe. Their open horizons, wild coastlines, dark skies and peaceful atmosphere are qualities that cannot be recreated once they are lost. Visitors like myself & people who live there value these islands for their natural beauty, tranquillity and sense of remoteness. Introducing large-scale industrial wind turbines would permanently alter the character of this unique landscape.

I am also deeply concerned about the potential impact on wildlife. The Hebrides support internationally important populations of seabirds, birds of prey, marine mammals and other protected species. Construction activity, habitat disturbance and the risk of bird collisions could have lasting consequences for these fragile ecosystems. Environmental assessments for Hebridean projects have repeatedly highlighted the need to protect species such as golden eagles, red-throated divers and other birds of conservation concern.

Equally important is the loss of tranquillity. The Hebrides are renowned for their silence, dark skies and freedom from industrial development. These qualities are increasingly rare and are fundamental to the wellbeing of residents and the experience of visitors. Large turbines, aviation lighting, construction traffic and associated infrastructure would fundamentally change the atmosphere of these islands and diminish what makes them so special.

I fully recognise the importance of renewable energy and the need to tackle climate change. However, renewable energy projects must be located where they do not cause unacceptable damage to landscapes, wildlife and communities of national and

international importance. Protecting the natural heritage of the Hebrides should remain a priority alongside achieving net zero.

For these reasons, I respectfully ask that this proposal be refused and that the exceptional beauty, wildlife and tranquillity of the Hebrides are safeguarded for future generation

Based on my own local knowledge, I also wish to highlight that: Iona is so close to the treshnish islands where puffins migrate to every year I fear these birds would not return or recognise the landscape

1.1.182 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the relevant statutory and policy criteria governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal area. Moreover, published analyses of the applicant's documentation reveal that these impacts have been underestimated, and the necessary heritage assessment has not been completed. While the effects on the island communities involved were identified, they have never undergone proper assessment. Additionally, the ecological requirements have not been demonstrated to be achievable. It is also noteworthy that only a portion of the project falls under the jurisdiction of the Scottish Ministers.

In light of these deficiencies, it is respectfully submitted that the Scottish Ministers should refuse consent for the MachairWind Offshore Wind Farm and decline the associated marine licence.

Should the Ministers consider granting consent, it is requested that they require the submission of further environmental information and enhanced visualisations. Furthermore, the applications should be determined only following a public inquiry, which would enable a thorough examination of the concerns outlined in this representation. Regardless of the decision reached, it is also urged that the Ministers explicitly address the impacts on cultural heritage and the affected island communities within their final reasons.

Yours faithfully,

[Redacted]

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

Member of the public 520
Dear Sir/Madam,

I wish to formally register my objection to the proposed MachairWind Offshore Wind Farm, which is currently the subject of two applications: application number 00012385 seeking consent under section 36 of the Electricity Act 1989, and application number 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications have been submitted by MachairWind Limited, trading as ScottishPower Renewables. I request that this communication be accepted as an official objection, that I be recorded as an objector, and that I receive notification of the outcome of these applications.

The project proposes an offshore wind farm with a generating capacity of approximately 2 gigawatts. This would involve the installation of between 91 and 144 wind turbines, each reaching up to 335 metres in height to blade tip. The development is planned within a designated Windfarm Development Area covering around 448 square kilometres of marine space situated north-west of the island of Islay and west of Colonsay. The site lies approximately 21 kilometres from Iona and is in close proximity to other islands and coastal communities within the southern Hebrides.

My objection is grounded in planning and environmental considerations, which are addressed within the statutory and policy frameworks governing the determination of these applications. It is important to emphasise that the onus lies on the applicant to provide comprehensive and compelling evidence demonstrating that all relevant legal and policy tests have been met. Objectors, including myself, are not obliged to establish the contrary. Based on the following detailed reasons, I conclude that the applicant has failed to meet this evidential burden, and therefore consent should be withheld.

1.1.183 Legislative and Policy Framework

The application fails to demonstrate adequate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989. This Schedule mandates that the applicant must have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, as well as protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant is required to take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The evidence before the determining authority does not establish that these obligations have been satisfactorily addressed.

Given that the Scottish Ministers are also required to have regard to these statutory duties in determining the application, the failure to demonstrate compliance constitutes a significant deficiency. Where such compliance is not shown, or where evidence reveals omissions or conflicts with the applicable legal and policy framework, these factors weigh decisively against the granting of consent. Accordingly, the application should be refused on the basis that it does not meet the statutory requirements of Schedule 9 of the Electricity Act 1989.

The marine licence application under consideration must be determined in accordance with Part 4 of the Marine (Scotland) Act 2010 and the policies set out in Scotland's National Marine Plan. The statutory framework requires that authorisation decisions align with the National Marine Plan unless relevant considerations indicate otherwise. Central to this assessment are the General Policies GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts). Compliance with these policies is an integral part of the statutory evaluation of the application.

A detailed examination of the application reveals that compliance with these statutory policies has not been demonstrated. The evidence identifies deficiencies and omissions in the application's approach to co-existence with existing marine users, failing to satisfy the requirements of GEN 4. There is an absence of adequate assessment or mitigation measures addressing potential impacts on the historic environment, contrary to GEN 6 and the guidance in paragraphs 4.22 to 4.23. Similarly, the application does not sufficiently consider effects on landscape and national scenic areas as required by GEN 7 and paragraph 4.28, nor does it adequately address natural heritage concerns under GEN 9.

Furthermore, the application falls short in demonstrating effective engagement with stakeholders, a requirement under GEN 18, and does not provide sound evidence in accordance with GEN 19 and paragraph 4.81. The cumulative impacts of the proposal, which must be assessed under GEN 21 and paragraph 4.85, are not properly evaluated or mitigated. These shortcomings represent clear conflicts with the applicable legal and policy framework.

Given these identified deficiencies, omissions, and conflicts, the application fails to meet the statutory requirements of the Marine (Scotland) Act 2010 and the National Marine Plan policies. As such, these matters weigh decisively against the granting of consent for the marine licence. The application should therefore be refused on the grounds of non-compliance with the statutory marine planning framework.

This proposal fails to demonstrate compliance with the mitigation requirements set out in National Planning Framework 4 (NPF4), specifically in relation to biodiversity, natural places, historic assets, and energy policies. NPF4 is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. The proposal engages Policies 3, 4, 7, and 11 of NPF4, which address biodiversity, natural places, historic assets and places, and energy respectively.

The submitted evidence does not establish that the proposal meets the standards or obligations of these policies. There are clear deficiencies and omissions in demonstrating how biodiversity will be protected or enhanced, how natural places will be conserved, how historic assets and places will be safeguarded, and how energy considerations will be appropriately addressed. These failures amount to conflicts with the applicable legal and policy framework.

Given that compliance with these key policies has not been demonstrated, and the evidence identifies substantive shortcomings, the proposal is contrary to the requirements of NPF4. As such, these matters weigh decisively against the granting of planning consent.

The proposal fails to comply with the statutory requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which mandate that the likely significant environmental effects of the development must be identified, assessed, and reported prior to any determination. This failure to provide an adequate environmental impact assessment undermines the decision-making process by leaving the determining authority without the necessary information to fully understand the environmental consequences of the proposal.

Furthermore, the proposal does not demonstrate compliance with the Habitats Regulations, which require a thorough assessment of the effects on European protected sites in accordance with the applicable statutory tests. The absence of such an assessment, or any evidence addressing potential impacts on these protected sites, constitutes a clear deficiency and omission in the application. Given these failures to meet essential legal and policy requirements, the proposal is in conflict with the established environmental protection framework, and these shortcomings must weigh decisively against the granting of consent.

The proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018, thereby undermining the statutory decision-making requirements. The Act explicitly requires that the interests of island communities be taken into account and given due weight throughout the planning process. In this case, there is no demonstrated compliance with this obligation, and the evidence reveals deficiencies and omissions in addressing these statutory considerations. Such failures constitute a conflict with the applicable legal and policy framework and, accordingly, weigh against the granting of planning consent.

The practical consequence of the applicant’s failure to provide robust, objective, and proportionate evidence demonstrating compliance with all relevant statutory duties, planning policies, and environmental assessment requirements is that the application cannot be lawfully approved. The evidential burden rests squarely on the applicant to prove that every applicable legal and policy framework has been satisfied. Without such demonstration, the decision-maker is left without the necessary assurance that the proposal meets the comprehensive standards set by legislation and policy.

The submitted evidence does not establish that the applicant has fulfilled this responsibility. There are clear deficiencies and omissions in the documentation provided, and no conclusive proof has been presented to confirm adherence to all statutory and policy obligations. This absence of demonstrable compliance undermines the integrity of the application and directly conflicts with the established legal and planning framework. As a result, the application fails to meet the fundamental requirements for lawful consent.

Given these shortcomings, the application must be refused. The failure to demonstrate compliance with the full suite of legal and policy requirements is a

decisive factor that weighs heavily against granting consent. It is incumbent upon the determining authority to uphold the statutory and policy safeguards by rejecting proposals that do not meet the evidential standards necessary to confirm lawful and policy-compliant development.

1.1.184 Conflict with National Planning Framework 4 and the Development Plan

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

The proposal fails to demonstrate effective mitigation when assessed against the requirements of relevant National Planning Framework 4 policies protecting designated assets. Policy 11, in conjunction with Policies 4(c) and 4(d), safeguards National Scenic Areas and nationally important landscapes by preventing significant adverse effects on their designated qualities. Additionally, Policy 7, including subsection 7(h) concerning scheduled monuments and subsections 7(c) and 7(d) relating to the setting of historic assets, as well as Policy 3 on biodiversity, impose stringent protections.

In this case, the proposal would cause significant adverse effects on nationally designated landscapes and seascapes, contrary to the protective intent of these policies. Furthermore, it has not been demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, nor that island communities would be adequately safeguarded. The ecological assessments submitted fail to satisfy the necessary tests required under the relevant biodiversity policies. Accordingly, the proposal conflicts with multiple NPF4 policies aimed at protecting nationally important landscapes, heritage assets, and biodiversity.

When considering the terrestrial development plan framework relevant to land-based effects, it is evident that the proposal fails to provide adequate mitigation to address the adverse impacts identified. Specifically, the Argyll and Bute Local Development Plan 2 seeks to protect landscape, heritage, and community interests, yet the proposal would result in significant harm to these valued aspects. The measures put forward do not sufficiently counterbalance the detrimental effects, leading to a clear inconsistency with the plan's protective aims.

This conflict with the Argyll and Bute Local Development Plan 2 extends beyond local policy to encompass the broader National Planning Framework 4 when read in

its entirety. The applicant has not demonstrated how the proposal aligns with the development plan framework or overcomes the identified conflicts. Consequently, the proposal stands in opposition to the established terrestrial planning policies designed to safeguard land-based interests, and this inconsistency should weigh heavily against its approval.

1.1.185 Seascape, Landscape and Visual Effects

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

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

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

When assessing the impact of the proposed development on the night-time seascape character, it is important first to consider the nature and extent of any

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

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

The applicant acknowledges that the proposed development's effects engage several key policies, including NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. However, the applicant has not demonstrated that its conclusions regarding the scale of these accepted effects align with its own stated methodology. Furthermore, there is a failure to show compliance with the policies designed to protect nationally important landscapes and seascapes. This lack of clear evidence and adherence to policy requirements indicates that the proposal does not meet the necessary standards set out for safeguarding these valued environmental interests.

1.1.186 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment fails to demonstrate compliance with the required methodology for evaluating impacts on the setting of historic assets, thereby undermining the reliability of its conclusions regarding heritage harm. Although the applicant adopts Historic Environment Scotland's established methodology—developed through consultation and requiring a specific evaluative step to determine whether changes affect the contribution setting makes to cultural significance and whether the integrity of setting is retained—the published Methodological Audit identifies a critical omission. The Audit, based solely on the applicant's Appendix 14.3, finds that while the operational assessment describes visual changes such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it does not show how the integrity of setting has been assessed in line with the methodology's explicit requirement. Instead, the assessment concludes without evidencing this evaluative step, leaving the claimed retention of setting integrity unsubstantiated. This fundamental gap calls into question the robustness of the applicant's heritage impact conclusions.

The applicant's baseline assessment acknowledges that the cultural significance of the heritage assets in question arises from a combination of factors, including pilgrimage, arrival by sea, movement through an active cultural landscape, and the interrelationships between monuments, spirituality, and the encompassing landscape

and seascape. Importantly, these qualities are experienced dynamically through movement rather than from static viewpoints. Despite this recognition, Historic Environment Scotland's consultation responses, as recorded within the application, have highlighted the need for additional viewpoints to ensure these broader experiential and cultural landscape qualities are adequately captured and represented. This suggests that the current assessment may not fully encompass the depth of the heritage assets' cultural significance, potentially leading to an incomplete understanding of the impacts. Therefore, it is essential that the evaluation of heritage effects incorporates these wider landscape and experiential factors to inform a more comprehensive and appropriate heritage impact assessment.

The landscape assessment forms a foundational element upon which the heritage impact conclusions are constructed. Any understatement within the landscape assessment inevitably permeates through to the heritage analysis, resulting in a parallel minimisation of potential effects. This dependency means that if the landscape impacts are not fully or accurately represented, the subsequent conclusions regarding heritage impacts cannot be regarded as robust or credible.

Given the identified deficiencies in the landscape assessment, it follows that the heritage conclusions are similarly compromised. The inherent reliance of heritage evaluations on the landscape context necessitates a precise and comprehensive landscape assessment to underpin any heritage impact findings. Without this, the heritage conclusions are undermined by the same shortcomings, diminishing their reliability and calling into question the overall validity of the assessment.

The application fails to demonstrate compliance with key policy requirements designed to safeguard heritage assets of international and national importance, notably those protected under NPF4 Policy 7(h) concerning scheduled monuments and Policies 7(c) and 7(d) related to their setting. This shortfall is significant given the statutory weight these provisions carry in the planning framework. Additionally, the application does not adequately engage with GEN 6 or the guidance set out in paragraphs 4.22 to 4.23 of the National Marine Plan, both of which reinforce the imperative for rigorous heritage protection.

Critically, the applicant has not provided sufficient evidence to show that the cultural significance of these heritage assets and their settings will be preserved. The absence of a robust assessment undermines the confidence that the proposed development would not result in harm to assets of such high heritage value. Without this essential analysis, Scottish Ministers cannot be satisfied that the statutory duties relating to heritage protection have been fulfilled, thereby compromising the application's acceptability in principle.

In light of these deficiencies, it is clear that the proposal does not meet the necessary standards for the protection of heritage assets as mandated by current planning policy. This failure to adequately assess and mitigate potential impacts on culturally significant sites fundamentally undermines the application's compliance and warrants refusal. Consequently, the application should not be granted planning permission.

1.1.187 Effects on Island Communities, Tourism and the Local Economy

The island communities subject to this proposal rely to an exceptional degree on visitors, whose presence is directly linked to the intrinsic qualities identified in the applicant's own baselines: landscape, seascape, cultural heritage, tranquillity, and remoteness. These attributes are not incidental but foundational to the islands' economic vitality, underpinning the visitor economy that sustains local businesses, services, and employment opportunities.

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

While the applicant's assessment methodology addresses potential impacts on port communities with detailed analysis, it notably lacks an equivalent, place-based evaluation of the island communities directly facing the development. The applicant's own consultants acknowledged habitability as a potentially significant pathway affecting these island communities; however, no specific assessment of island habitability was conducted. Instead, the socio-economic assessment in Chapter 18 operates at a broad regional level and concludes that island communities exhibit low sensitivity to tourism effects. This approach is fundamentally flawed because small island economies cannot be accurately represented by regional averages. Their economies are concentrated in sectors highly vulnerable to changes in the attributes that attract visitors, and an increasing reliance on visitor numbers exacerbates their sensitivity rather than diminishes it. Therefore, the conclusion of low sensitivity, derived without any place-based analysis, constitutes an unsupported assumption rather than evidence. Consequently, the applicant's socio-economic assessment is inadequate to understand or mitigate the true impacts on island communities.

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

Moreover, the applicant has acknowledged that island communities warrant particular scrutiny but has failed to conduct the necessary assessment to understand the potential effects on these communities. There is no demonstrated evidence that the proposal is compatible with the principles of sustainable island communities, nor that the statutory duties owed to these communities have been adequately discharged. Given this shortfall, it is clear that the proposal does not meet the required standards for assessing and protecting island communities as mandated by

current policy and legislation. Consequently, the proposal should not be approved in its current form.

1.1.188 Ecology, Biodiversity and Habitats Regulations

There is considerable uncertainty regarding the potential environmental impact of the proposed development due to the presence of Priority Marine Features and Annex I habitats within the development area itself. These ecological designations indicate that the site holds significant biodiversity value, warranting careful consideration in the planning process. The surrounding waters further support important species such as seabirds, marine mammals and basking sharks, all of which contribute to the ecological sensitivity of the location.

The proposal involves introducing large-scale construction, operational and decommissioning activities into this environmentally sensitive marine environment. Given the scale and duration of these activities, potentially spanning several decades, there is a substantial risk of significant adverse effects on the protected habitats and species present. The long-term nature of the development intensifies concerns about cumulative impacts and the resilience of the local ecosystem.

In light of these factors, it is imperative that the planning authorities undertake a thorough assessment of the ecological importance of the site and the potential consequences of the proposal. Without clear evidence demonstrating that the environmental risks can be effectively mitigated, there remains a strong case for caution. The protection of Priority Marine Features and associated protected species must be a primary consideration in determining the acceptability of this development.

The applicant’s evidence confirms that, under the Habitats Regulations, planning consent may only be granted once the competent authority has ascertained that the proposed development will not adversely affect the integrity of the protected site, unless the stringent derogation tests are fully satisfied. Importantly, consent can lawfully be given only where no reasonable scientific doubt remains regarding adverse effects. The responsibility to demonstrate this high evidential standard lies unequivocally with the applicant. It is further clarified that mitigation measures, compensation proposals, and future monitoring alone do not suffice to meet the statutory tests required by law. This legal framework is reinforced by policy provisions within GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). Taken together, this establishes a stringent and legally binding threshold that must be met before any consent can be granted for developments impacting protected habitats and species.

The practical consequence of the applicant’s failure to demonstrate compliance with the statutory tests is that the proposed development cannot be lawfully approved without risking harm to internationally important habitats and species. A detailed examination of the submitted evidence, including the applicant’s own derogation documents, reveals an absence of sufficient certainty that the necessary legal protections will be upheld. This lack of demonstrable compliance undermines the statutory framework designed to safeguard these ecological features. Consequently, the application falls short of the legal requirements, and consent should therefore be withheld.

1.1.189 Cumulative and In-Combination Effects

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

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

Moreover, this approach is inconsistent with established legal principles. The courts, as affirmed in Raeshaw Farms, have made clear that a project must be assessed in its entirety and not divided into smaller parts whose individual effects seem diminished. Therefore, the current assessment method is procedurally and legally flawed, as it prevents a comprehensive evaluation of the project's cumulative impacts.

The cumulative impact assessment presented in the Environmental Impact Assessment relies heavily on baseline evaluations that have themselves been demonstrated to understate the effects on landscape, heritage, and socio-economic factors. This foundational underestimation compromises the integrity of the cumulative assessment, as it effectively begins from an already diminished baseline. Consequently, the combined effects of the current proposal, when considered alongside existing, consented, and foreseeable developments, are systematically undervalued.

Given that the cumulative assessment is contingent upon these flawed baseline conclusions, the overall appraisal cannot be regarded as reliable. The true extent of the cumulative impacts is therefore likely to be greater than that indicated, with significant implications for the adequacy of proposed mitigation measures. It follows that decision-makers should exercise caution in accepting the current assessment's findings without further, more rigorous baseline analyses to ensure that cumulative effects are accurately identified and addressed.

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

treatment of these deferred elements to ensure regulatory compliance and a robust environmental assessment.

1.1.190 Public Engagement, Site Selection and Environmental Information

While the applicant requests that Scottish Ministers place significant weight on the site-selection process, it is essential to consider the shortcomings in public participation that undermine its legitimacy. The consultation period coincided with the busiest months for island communities, when residents are occupied with continuous work throughout the visitor season and access to specialist advice is limited. This timing contrasts sharply with the applicant's extended preparation period, which has benefited from substantial professional and financial resources. Consequently, the affected communities have not been afforded a comparable opportunity to engage meaningfully with the extensive technical material submitted, which runs to many thousands of pages.

The principles enshrined in GEN 18 of the National Marine Plan, alongside those of the Aarhus Convention, explicitly require that affected parties have a realistic chance to participate in decisions of this significance. The conditions under which communities have been expected to respond clearly fall short of this standard. It is therefore imperative that Ministers take these deficiencies in public participation seriously when considering the representations made, recognising that the consultation process as conducted does not meet the required standards of effective engagement.

The Environmental Impact Assessment provided in this application identifies several pathways to significant environmental effects but fails to investigate them comprehensively. Key assessments, including the landscape evaluation, heritage analysis, and socio-economic study, either do not apply their own methodologies correctly or lack critical place-based analysis, undermining the reliability of their conclusions. This insufficiency means that the extent and nature of likely significant effects remain inadequately evidenced.

Moreover, the application depends on future measures such as post-consent plans, ongoing monitoring, and additional approvals to address environmental concerns. However, reliance on these subsequent steps does not satisfy the requirements of the EIA Regulations, which mandate that likely significant effects be fully understood and assessed prior to determination. The prospective nature of these controls cannot substitute for robust, upfront environmental information.

In conclusion, the Scottish Ministers must base their decision on the evidence currently before them, not on assumptions that outstanding issues will be resolved later. The applicant has not demonstrated that the environmental information submitted is sufficient for an informed determination, and accordingly, the application should not be approved in its present form.

1.1.191 Effects on Local Area

The proposed development encompasses a substantial 448 square kilometre area situated immediately north-west of Islay and west of Colonsay, placing these islands

in closest proximity to the project site. Despite this, the applicant's assessment predominantly considers Islay in terms of its potential as a direct project location rather than as a distinct affected community. This approach fails to provide a place-based evaluation of the development's effects on Islay's Atlantic-facing communities, whose daily lives and local economy would be directly influenced by the nearest edge of the development area. Consequently, the assessment does not adequately address the considerable and direct impact on the setting, community life, and economic activities of Islay's residents.

For Colonsay and Oronsay, the situation is equally concerning. The islands' seaward outlook, integral to their daily existence, faces the development array directly. Notably, the North Colonsay and Western Cliffs Special Protection Area, located along Colonsay's coastline, is central to the applicant's derogation case and compensation plan, which implicitly acknowledges that harm to the internationally protected seabird population cannot be ruled out. Additionally, Oronsay Priory, a scheduled monument of national importance within this community, has an open maritime setting that the heritage assessment inadequately addresses, mirroring the gaps identified elsewhere in the application. Collectively, these shortcomings undermine the reliability of the environmental and heritage impact evaluation for Islay, Colonsay, and Oronsay, as the applicant's assessment does not sufficiently capture the direct and significant effects on these island communities, their economy, and their heritage assets.

The applicant's own Coastal Character assessment acknowledges that the Sound of Iona is of high sensitivity, with a direct orientation towards the proposed development area and extensive visibility. The assessment identifies a large geographical extent of change, approximately 21 kilometres, with turbines spanning around 39 degrees of the horizon, resulting in an overall effect deemed Moderate and Significant. The West Coast of Iona is similarly rated as highly sensitive with widespread visibility, and the applicant concedes significant effects for both residents and visitors across much of the island, including at Dùn Ì, the island's highest point. Furthermore, the applicant's baseline recognises Iona's monastic landscape—comprising the Abbey, the Nunnery, and the high crosses—as heritage of international importance, with significance intrinsically linked to pilgrimage, arrival by sea, and movement through the landscape. Despite Historic Environment Scotland's request for additional viewpoints, including from the ferry crossing itself, the applicant has failed to provide a visualisation from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, a notable omission given its heritage context.

Community concerns further underscore the scale of the impact. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal, yet the applicant's own consultants identified habitability as a potential pathway of effect on this community, which has not been assessed. The perceived scale of the turbines can be contextualised by comparison with the landmark Ben Hynish on Tiree, which stands 141 metres high and is visible from Iona at approximately 33 kilometres. The largest turbines would surpass Ben Hynish by roughly 194 metres, despite being situated at about two-thirds of that distance. This comparison emphasizes the substantial visual intrusion and underlines that the applicant's assessment understates the significance of visual, community, and heritage impacts

on Iona, thereby compromising the accuracy of the environmental and social impact evaluation.

The applicant's assessment of the visual and community impacts on Mull and Ross of Mull coastal areas relies heavily on distance-based mitigation assumptions, which inadequately reflect the true magnitude of change experienced by these sensitive locations. For example, while the Loch na Keal National Scenic Area is acknowledged as having High sensitivity at viewing distances between 21 and 33 kilometres, the applicant attributes no greater than Medium magnitude to the effects, thereby understating the significance of impact. Similarly, the Ross of Mull South coastal area, assessed as of High sensitivity at approximately 22 to 24 kilometres, is attributed only Medium magnitude despite acknowledged significant effects at Erraid, on Core Paths of the Ross, and notably at Fionnphort. This latter community is particularly critical as it serves as the gateway to Iona and the primary embarkation point for visitors, yet the assessment fails to adequately account for the disruption to its flow of tourism and community life. The treatment of more distant areas, such as the Wilderness and Gribun Rocks coastal area beyond 30 kilometres, further exemplifies this reliance on distance to downplay the scale of visual change, with the applicant concluding a small scale of change solely on that basis.

Beyond the shortcomings of the visual assessment, the applicant's approach neglects the essential economic and community dimensions tied to these landscapes. Mull's west-facing tourism economy, including its wildlife boat operators and the accommodation sectors within its western townships, is fundamentally dependent upon the Atlantic seascape, which the proposed development would industrialise. Despite this, none of these communities has been subject to a place-based assessment that might elucidate the full extent of economic and social impacts. The failure to recognise the interdependence of landscape, community identity, and visitor experience results in an incomplete and potentially misleading evaluation of effects. Given the prominence of tourism in sustaining these communities, and the designation of key landscapes as nationally and locally important, the applicant's assessment falls short of capturing the significant visual, economic, and community impacts that the development would engender.

While the applicant's assessment acknowledges some effects on designated landscapes, it systematically underestimates or omits significant impacts on key seaboard areas and vulnerable island communities. For example, Ulva, situated within the Loch na Keal National Scenic Area, is a community-owned island undergoing regeneration. Its recovery is critically dependent on the preservation of the unspoilt seascape and setting that the development threatens; yet, no assessment has been made of these effects. Similarly, Staffa, also within the Loch na Keal National Scenic Area and renowned as one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development area—beyond even the 30-kilometre distance NatureScot recommended for assessing effects on National Scenic Area qualities. Despite the applicant's own recognition of Staffa's panoramic maritime qualities, the conclusion that changes there would be small and not significant is insufficiently justified. The Jura National Scenic Area, assessed at 28 to 32 kilometres distance and classified as of High sensitivity, is attributed only Medium to Low magnitude effects based on distance and retained landforms. This disregards that the designation is founded on its wild, undeveloped Atlantic

character, which is vulnerable to the development's influence. The Scarba, Lunga and the Garvellachs National Scenic Area, 35 to 40 kilometres away, receives an equally limited treatment. Overall, these shortcomings in the assessment undermine the protection of the natural and cultural qualities of important designated landscapes and the viability of island communities reliant on them.

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

The applicant's assessment overlooks significant effects on several mainland and island communities that have direct visual and economic connections to the seascape in question. For example, Gigha, a community-owned island renowned as a national symbol of island regeneration, faces the development waters from the east; yet, no examination has been made of how these impacts might affect its delicate community balance and local economy. Similarly, the west coast of Kintyre comprises a series of communities whose identity and visitor economy are closely linked to the open Atlantic seaboard views towards Islay, Jura, and surrounding waters. These areas, along with the Treshnish Isles and other small islands and mainland coasts with views toward the development, have been excluded from any detailed consideration.

Furthermore, Ardnamurchan Point—the westernmost point of the British mainland—offers panoramic views along the Hebridean seaboard that attract visitors along the peninsula's length. Such seaward panoramas represent precisely the receptors that the applicant's distance-based moderation approach seeks to diminish, thereby undermining the robustness of the visual impact assessment. By failing to address these key receptors, the assessment compromises its comprehensiveness and risks underestimating the potential adverse effects on communities whose economies and cultural identities depend on the quality of their seascape environment.

The applicant's assessment reveals a clear pattern: whenever a highly sensitive receptor is located beyond approximately 20 kilometres, the magnitude of change is systematically moderated and the resulting effect discounted. This approach effectively excludes comprehensive place-based evaluations for the communities experiencing these impacts. Such systematic moderation and discounting beyond this distance threshold lead to a consistent underestimation of significant effects on sensitive receptors. Consequently, the integrity of the environmental impact assessment is undermined, as the lived experiences and specific circumstances of

affected communities beyond 20 kilometres are neither fully recognised nor adequately addressed.

1.1.192 Personal Observations

In addition to the planning matters above, I am personally concerned because: Here on Skye, we are going through the same process of developers wanting huge wind turbines.. Local people ignored. Scottish SNP and UK LABOUR dont give a dam about local economy, tourism

Based on my own local knowledge, I also wish to highlight that: Fish, mamals,birds, people , tourism, keeping younger generation on islands

Finally, I would also ask the Scottish Ministers to consider: All islanders appreciate that we need renewable energy, BUT why on such a large scale, with massive infrastructure,
Remember for every big tower, there is a huge base. These bases will not be removed at end of life. See grass, peat bog, nature's environment all sacrificed for a usually foreign company to make a profit, governments to tick a box and get a licence fee. Landscape and seascape ruined, and we still have the highest electricity costs in Europe

1.1.193 Summary

The proposal before the Scottish Ministers fails to satisfy the relevant statutory and policy requirements governing its determination. The applicant’s own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the cultural heritage and communities along the coast. However, an analysis of the applicant’s documentation reveals that these adverse effects have been consistently underestimated. Crucially, the necessary heritage assessment has not been conducted, and although the impacts on the island communities within the project’s influence were identified, they have not been adequately assessed. Furthermore, the ecological criteria mandated by policy have not been demonstrated as achievable. It is also important to note that the application submitted to the Scottish Ministers only covers a portion of the overall project.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm proposal, and to decline the associated marine licence.

Should the Ministers consider granting consent, I request that they require the submission of additional environmental information and enhanced visualisations to better inform their decision. I further advocate that the application be subjected to determination only following a public inquiry, providing a forum in which the concerns raised here can be thoroughly examined. Regardless of the outcome, I ask that the Ministers explicitly address the impacts on cultural heritage and the island communities within their decision statement.

Yours faithfully,

[Redacted]

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

Member of the public 521
Dear Sir/Madam,

I hereby submit a formal objection to the proposed MachairWind Offshore Wind Farm, which is the subject of two applications: application 00012385 for consent under section 36 of the Electricity Act 1989, and application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications have been made by MachairWind Limited, a subsidiary of ScottishPower Renewables. I request that this letter be recorded as an official objection, that I be listed as an objector, and that I receive notification of the outcome of these applications.

The development proposed comprises an offshore wind farm with an installed capacity of approximately 2 gigawatts. It would consist of between 91 and 144 turbines, each with a maximum blade tip height of up to 335 metres. The site lies within a designated Windfarm Development Area covering around 448 square kilometres of sea to the north-west of Islay and west of Colonsay. The location is approximately 21 kilometres from the island of Iona and is situated in close proximity to the islands and coastal communities of the southern Hebrides.

My objection is grounded in both planning and environmental considerations, which are elaborated in the following sections with reference to the relevant statutory and policy frameworks governing the determination of these applications. It is important to emphasise that the onus lies entirely with the applicant to provide sufficient evidence demonstrating compliance with the applicable tests prescribed by law and policy. Objectors are not required to establish contrary proof. On the basis of the evidence presented, the applicant has failed to satisfy this burden, and accordingly, consent ought to be refused.

1.1.194 Personal Observations

In addition to the planning matters above, I am personally concerned because: Have been coming to Iona for over 40 years and feel it would just not be the same . Must be plenty other areas round Scottish coast that could be used . And a huge number of birds in surrounding area .

1.1.195 Summary

The proposal before the Scottish Ministers fails to satisfy the relevant statutory and policy requirements governing its determination. The applicant’s own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the cultural heritage and communities along the coast. However, an analysis of the applicant’s documentation reveals that these adverse effects have been consistently underestimated. Crucially, the necessary heritage assessment has not been conducted, and although the impacts on the island communities within the project’s influence were identified, they have not been adequately assessed. Furthermore, the ecological criteria mandated by policy have not been demonstrated as achievable. It is also important to note that the application submitted to the Scottish Ministers only covers a portion of the overall project.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm proposal, and to decline the associated marine licence.

Should the Ministers consider granting consent, I request that they require the submission of additional environmental information and enhanced visualisations to better inform their decision. I further advocate that the application be subjected to determination only following a public inquiry, providing a forum in which the concerns raised here can be thoroughly examined. Regardless of the outcome, I ask that the Ministers explicitly address the impacts on cultural heritage and the island communities within their decision statement.

Yours faithfully,

[Redacted]

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

Member of the public 522
Dear Sir/Madam,

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

The development under consideration involves the construction of an offshore wind farm with an estimated capacity of approximately 2 gigawatts. The project would encompass between 91 and 144 turbines, each potentially reaching a maximum height of 335 metres to blade tip. The proposed site lies within a Windfarm Development Area spanning roughly 448 square kilometres of marine environment, positioned to the north-west of Islay and west of Colonsay, at an approximate distance of 21 kilometres from Iona. This locale is in close proximity to the islands and coastal settlements of the southern Hebrides.

This objection is grounded in a detailed assessment of the planning and environmental considerations relevant to the proposal, firmly situated within the statutory and policy context that governs the determination of such applications. It is paramount to emphasise that the responsibility lies squarely with the applicant to provide adequate and convincing evidence that all applicable statutory tests and policy requirements have been met. Objectors are not obliged to establish the contrary. Having evaluated the evidence presented, it is evident that the applicant has failed to meet this burden of proof. Consequently, for the reasons elaborated herein, consent for the MachairWind Offshore Wind Farm should be refused.

1.1.196 Legislative and Policy Framework

The application before the Scottish Ministers raises significant uncertainty regarding compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989. This Schedule explicitly requires the applicant to have regard to the desirability of preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, as well as protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant must take reasonable steps to mitigate any adverse effects arising from the proposal on these protected interests. The evidence submitted fails to demonstrate that these statutory duties have been adequately addressed or fulfilled.

In addition, the statutory framework mandates that the Scottish Ministers, when determining the application, must themselves have regard to these same duties. The application documentation and supporting evidence do not provide sufficient assurance that this requirement can be met. There are clear deficiencies and omissions in the assessment of impacts on the natural and built environment, and the proposed mitigation measures are either inadequately described or absent. This lack of compliance with the statutory duties under Schedule 9 introduces a material conflict with the applicable legal and policy framework governing such developments.

Where compliance with Schedule 9 has not been demonstrated, or where the evidence identifies such deficiencies and omissions, these matters must weigh decisively against the granting of consent. The absence of robust evidence confirming that the statutory duties have been properly considered and addressed undermines the legitimacy of the application and compels a conclusion that consent should not be granted in its current form. The statutory duties under the Electricity Act 1989 Schedule 9 remain paramount and unfulfilled in this case.

The marine licence application under consideration is required to be determined in accordance with Part 4 of the Marine (Scotland) Act 2010 and must comply with Scotland's National Marine Plan unless relevant considerations indicate otherwise. The statutory framework explicitly mandates that authorisation decisions adhere to the General Policies set out in the National Marine Plan, which include but are not limited to GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts). These policies collectively establish a comprehensive legal and policy baseline against which the application must be rigorously assessed. The application documentation and supporting evidence have not demonstrated compliance with these essential policies, which form an integral part of the statutory assessment process.

Where compliance with the National Marine Plan policies has not been demonstrated, or where the evidence reveals deficiencies, omissions, or conflicts with the applicable legal and policy framework, such matters must weigh decisively against the granting of consent. In this case, the application fails to provide sufficient evidence to satisfy the requirements of the relevant General Policies, including the need for sound evidence, proper engagement, and consideration of cumulative impacts, as well as protection of the historic environment, natural heritage, and landscape designations. The absence of demonstrated compliance with these statutory policies constitutes a fundamental procedural and substantive defect in the application. Accordingly, the marine licence application should be refused on the grounds that it does not meet the statutory requirements of the Marine (Scotland) Act 2010 and the National Marine Plan.

The proposal fails to comply with key policies of National Planning Framework 4 (NPF4), which is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. Specifically, the application does not demonstrate compliance with Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy), all of which are directly engaged by this proposal.

Policy 3 requires that developments protect and enhance biodiversity, yet the submitted evidence does not confirm that biodiversity interests will be maintained or improved. Policy 4 mandates the safeguarding of natural places, but the proposal lacks sufficient demonstration that natural habitats and landscapes will be preserved in accordance with this policy. Policy 7 obliges the protection of historic assets and places, yet the application fails to provide adequate evidence that historic environment considerations have been properly addressed or that heritage assets

will be conserved. Finally, Policy 11 on energy requires adherence to standards that promote sustainable energy use and efficiency, but the proposal does not establish conformity with these requirements.

Where compliance with these policies has not been demonstrated, or where the evidence identifies deficiencies, omissions, or conflicts with the applicable legal and policy framework, these matters weigh decisively against the granting of consent. Given the absence of satisfactory evidence to meet the requirements of NPF4 policies 3, 4, 7, and 11, the proposal is contrary to the statutory and policy framework governing this development.

In conclusion, the failure to demonstrate compliance with the relevant policies of National Planning Framework 4, combined with identified deficiencies and omissions, provides a clear basis for refusal of planning permission. The proposal does not meet the necessary legal and policy standards and therefore should not be granted consent.

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

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

The proposal under consideration fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be properly considered and given due weight in the decision-making process. This statutory obligation is clear and unambiguous, as set out in the Act itself, and is a critical component of the legal and policy framework governing developments affecting island areas.

A detailed examination of the submitted documentation reveals significant deficiencies and omissions in how the proposal addresses these statutory requirements. There is no substantive evidence that the interests of the relevant island communities have been adequately identified, assessed, or incorporated into the planning rationale. The absence of such consideration constitutes a failure to meet the explicit duties imposed by the Islands (Scotland) Act 2018.

Furthermore, the lack of demonstrable compliance with this legislative requirement is not a minor procedural oversight but a fundamental flaw that directly conflicts with the applicable legal framework. As established by the Act and reinforced by planning policy, where compliance cannot be shown, or where evidence highlights such deficiencies, these factors must weigh against the granting of planning consent.

In conclusion, the proposal does not satisfy the statutory duty to consider and give due weight to the interests of island communities as required by the Islands (Scotland) Act 2018. This failure represents a material conflict with the legal and policy framework and accordingly constitutes a compelling reason to refuse consent.

The practical consequence of the applicant's failure to provide robust, objective, and proportionate evidence demonstrating compliance with all relevant statutory duties, planning policies, and environmental assessment requirements is that the application cannot be lawfully approved. The evidential burden rests squarely with the applicant to prove that every applicable legal and policy framework has been satisfied. Without such demonstration, the decision-maker is left without the necessary assurance that the proposal meets the comprehensive standards mandated by legislation and policy.

The submitted evidence does not establish that the applicant has fulfilled this fundamental responsibility. There are clear deficiencies and omissions within the application materials that leave critical questions unanswered regarding compliance. These gaps in the evidence base mean that the proposal conflicts with the applicable legal and policy framework. As established in the approved evidence, where compliance has not been demonstrated, these unresolved matters must weigh decisively against the granting of consent.

In light of the above, the application should be refused on the grounds that the applicant has not met the essential evidential requirements. The absence of conclusive, proportionate, and objective proof of compliance with statutory duties and planning policies undermines the legitimacy of the proposal and precludes lawful approval. The planning authority must therefore reject the application to uphold the integrity of the statutory and policy regime governing development control.

1.1.197 Conflict with National Planning Framework 4 and the Development Plan

While NPF4 Policy 11 endorses renewable energy development, this support is expressly conditional upon compliance with the policy's impact criteria, notably those concerning effects on communities, landscapes, seascapes, and other sensitive receptors as outlined in subsections (c), (d), and (e). The proposal under consideration fails to meet these essential criteria, as the adverse impacts it would generate cannot be effectively mitigated to the standard required by the policy.

Unlike proposals that demonstrate robust measures to safeguard cultural heritage, ecological integrity, and community well-being, this development lacks convincing evidence of sufficient mitigation to offset its significant negative effects.

Specifically, the proposal would result in substantial harm to nationally designated landscapes and seascapes, undermining their value and character. Furthermore, there is an absence of demonstrated protection for the cultural significance of scheduled monuments and their settings, raising serious concerns about heritage preservation. The proposal also falls short of ensuring the safeguarding of island communities, a key consideration under Policy 11. Finally, the ecological assessments submitted do not establish that the necessary environmental tests can be met, leaving unresolved risks to biodiversity. Taken together, these deficiencies amount to a clear conflict with the impact criteria of NPF4 Policy 11, thereby undermining the policy's intended support for renewable energy development in this instance.

In considering the proposal against the requirements of the National Planning Framework 4 (NPF4), it is pertinent first to acknowledge the comprehensive scope of protective policies in place. Policy 11 works in conjunction with Policies 4(c) and 4(d), which specifically guard National Scenic Areas and other nationally important landscapes from significant adverse impacts affecting their designated qualities. Additionally, Policy 7 addresses the safeguarding of historic assets, including scheduled monuments and their settings, while Policy 3 focuses on biodiversity conservation. The mitigation measures proposed have yet to convincingly demonstrate an ability to align with the stringent protections these policies require.

A detailed examination reveals that the proposal would result in significant adverse effects on nationally designated landscapes and seascapes, undermining the intrinsic qualities for which these areas have been recognized. Furthermore, the cultural significance of scheduled monuments and their settings has not been satisfactorily protected, as the evidence submitted falls short of showing how these heritage assets would be preserved in situ. The safeguarding of island communities, which often have distinct vulnerabilities and cultural identities, has similarly not been assured through the proposal's provisions.

Finally, the ecological assessments provided fail to meet the necessary tests outlined in Policy 3. The submitted evidence does not convincingly establish that biodiversity interests could be maintained or enhanced, raising concerns about potential harm to protected species and habitats. Collectively, these shortcomings illustrate a clear conflict with multiple relevant NPF4 policies designed to protect designated assets, highlighting the need for a more robust approach to mitigation and compliance before the proposal can be considered acceptable.

Uncertainty remains regarding the extent to which the proposal aligns with the terrestrial development plan framework, particularly the Argyll and Bute Local Development Plan 2. It is evident that the proposal would have adverse effects on the landscape, heritage, and community interests that these policies are designed to protect. This raises significant concerns about the compatibility of the development with the established planning objectives for the area.

In light of these considerations, the proposal is clearly in conflict with both the relevant development plan and the overarching National Planning Framework 4 when read in its entirety. The applicant has not provided sufficient evidence to dispel these conflicts or to demonstrate that the proposal would comply with the policy framework. Therefore, it is concluded that the proposal should not be supported in its current form.

1.1.198 Seascape, Landscape and Visual Effects

The applicant's assessment methodology lacks a defined distance threshold beyond which major effects are considered to cease, yet an independent Evidence Note reveals a consistent pattern: no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of its inherent sensitivity or extent of visibility. This pattern is corroborated by the applicant's own documents, which acknowledge the influence of distance on their judgements—for example, an area over 30 kilometres away is assessed as experiencing only a small scale of change due to viewing distance. Furthermore, the Landscape Character synthesis categorises magnitude as High within roughly 20 kilometres, Medium between about 20 and 30 kilometres, and Low beyond approximately 30 kilometres for certain landscape types. This systematic moderation of magnitude at distances coinciding with the location of the most sensitive designated landscapes means that the protective tests are applied to understated inputs. Consequently, the conclusions drawn do not provide a reliable description of the effects that Scottish Ministers are being asked to consent to.

While the applicant has made efforts to mitigate visual impact through the use of visualisations consistent with NatureScot's guidance, it is important to recognise inherent limitations within these materials. NatureScot's own guidance, which the applicant follows, states that printed visualisations cannot fully replicate the scale experienced by a viewer in the field. Additionally, wireline drawings included within the same panoramic views share the same constraints as the accompanying photographs; they represent technical renderings within the visualisation rather than serving as independent corrections or enhancements. Consequently, reliance on these visual materials alone may lead to an underappreciation of the true extent of visual effects when experienced on site. It follows that while the visualisations contribute valuable information, their technical and perceptual limitations should be carefully considered in the overall assessment.

The introduction of aviation and navigation lighting associated with the proposed development would fundamentally alter the night-time seascape character. At present, the sea horizon remains unlit, preserving a natural and uninterrupted nocturnal environment. The permanent illumination over the 35-year operational period would create an artificial visual feature, changing the existing character and experience of the seascape in a way that cannot be mitigated by current proposals. While some forms of lighting may be designed to minimise adverse effects, the essential nature of these safety-related lights means that their presence is unavoidable and will result in a lasting alteration to the seascape.

Furthermore, it is important to recognise that the 35-year operational lifespan does not diminish the significance of this harm in planning terms. Granting consent for the

development effectively establishes that this seascape is appropriate for wind farm use, setting a precedent for similar proposals and the acceptance of such visual impacts. This policy implication underscores the need for careful consideration of the wider consequences of permitting lighting-induced changes to the night-time seascape character, beyond the operational timeframe. Therefore, any decision to approve the development must weigh the permanence of the seascape transformation against the strategic objectives that the wind farm seeks to achieve.

The proposal's acknowledged effects on the landscape and seascape are significant enough to engage multiple policies within the planning framework, specifically NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively aim to safeguard nationally important landscapes and seascapes from adverse impacts, underscoring the importance of rigorous assessment and mitigation measures.

However, the applicant has failed to substantiate that its assessment of these effects aligns with its own stated methodology. This lack of methodological consistency undermines the credibility of the conclusions presented and raises concerns about the accuracy of the predicted scale of impacts. Without clear evidence demonstrating that the assessment complies with established procedures, it is impossible to ascertain whether the proposal adequately addresses the relevant policy requirements.

In light of these deficiencies, the proposal does not meet the necessary standards set out in the planning policies designed to protect nationally important landscape and seascape interests. Consequently, the application should be refused on the grounds of non-compliance with the relevant statutory planning policies, ensuring that these valued environmental assets are properly conserved.

1.1.199 Cultural Landscape, Archaeology and Historic Environment

There is considerable uncertainty regarding the robustness of the applicant's assessment of heritage impacts, specifically in relation to the methodology employed for evaluating the setting of historic assets. While the applicant claims to have adopted the recognised methodology developed by Historic Environment Scotland, which emphasises assessing how changes affect the contribution setting makes to cultural significance and the integrity of that setting, it is unclear whether this has been rigorously applied. Notably, the methodology explicitly cautions against equating visual change directly with adverse impact, underscoring the need for a nuanced evaluative approach.

An independent Methodological Audit, conducted solely on the basis of the applicant's Appendix 14.3, highlights this shortfall. The audit acknowledges that the operational assessment identifies relevant heritage attributes, such as visibility, distance, monument prominence, retained views, screening, and skyline occupation. However, it finds that the assessment does not demonstrate how these factors have been integrated to assess the integrity of setting in accordance with the accepted methodology. Instead, the assessment appears to describe visual change before concluding that setting integrity is adequately retained, without presenting the necessary evaluative step required to substantiate that conclusion.

This omission fundamentally undermines the reliability of the applicant's conclusions regarding heritage impacts. Without clear evidence that the accepted methodology has been properly applied, the assessment's findings remain uncertain and cannot be relied upon to inform planning decisions with confidence. It is therefore essential that the assessment methodology be scrutinised and fully demonstrated to ensure compliance and maintain the integrity of heritage considerations.

The applicant's own baseline assessment acknowledges that the cultural significance of the affected heritage assets arises from a complex interplay of qualities, including pilgrimage, arrival by sea, and movement through a living cultural landscape. It recognises the importance of relationships between monuments, spirituality, and the surrounding landscape and seascape, all of which are experienced dynamically rather than through fixed viewpoints. This nuanced understanding underscores that heritage value extends beyond isolated features to encompass experiential and spatial dimensions that contribute to the overall cultural landscape.

Historic Environment Scotland's consultation responses, as recorded within the application documentation, highlight concerns that the applicant's assessment may not adequately capture these broader qualities. They specifically requested the inclusion of additional viewpoints to ensure a fuller representation of the cultural landscape's experiential aspects. This indicates a potential shortfall in the baseline assessment and suggests that the heritage impact appraisal may underestimate effects on the wider cultural and experiential context. Consequently, the assessment should be revisited to incorporate these broader perspectives, thereby providing a more comprehensive understanding of heritage impacts.

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

The application fails to demonstrate adequate protection for the cultural significance of internationally and nationally important heritage assets and their settings, a deficiency that fundamentally undermines its acceptability. Without the necessary assessment to support such a conclusion, the Scottish Ministers are left without the essential evidence to determine compliance with relevant policies.

This shortfall directly contravenes National Planning Framework 4 (NPF4) Policy 7(h) concerning scheduled monuments, alongside Policies 7(c) and 7(d) which address the setting of heritage assets. Furthermore, the application does not satisfy the requirements of GEN 6 or the guidance set out in paragraphs 4.22 to 4.23 of the

National Marine Plan, all of which collectively establish the framework for safeguarding heritage interests.

In the absence of a comprehensive assessment demonstrating that these heritage assets and their settings will be preserved, the application cannot be considered compliant with established policy. Consequently, it should not be approved until such evidence is properly provided and evaluated.

1.1.200 Effects on Island Communities, Tourism and the Local Economy

There is considerable uncertainty regarding the potential impacts of the proposed development on the fundamental economic and social sustainability of the island communities in question. These communities exhibit an exceptional degree of dependence on visitors, whose presence is closely tied to the intrinsic qualities of the islands. The applicant's own baseline assessments identify these qualities as including landscape, seascape, cultural heritage, tranquillity and remoteness.

Any alteration to these defining characteristics poses a direct threat to the economic foundations of the island communities. Given that the visitors are drawn specifically by these attributes, changes affecting them could undermine the very reasons for tourism and visitation. This, in turn, risks destabilising the local economy which supports not only businesses but also essential services, infrastructure and employment opportunities within these communities.

The potential consequences extend beyond economic considerations to touch upon the social fabric and long-term viability of the islands' populations. If the qualities that attract visitors are compromised, there is a real danger that the communities' ability to sustain themselves will be jeopardised. It is therefore imperative to approach the proposal with caution, recognising the significant uncertainties surrounding its effects on the islands' unique and delicate balance.

The applicant's socio-economic assessment notably contrasts the detailed evaluation of potential port communities with a generalized, regional-level approach to island communities, despite acknowledging habitability as a significant pathway for impact. While mitigation measures are proposed with respect to port areas, no comparable place-based assessment or tailored mitigation is undertaken for the island communities directly affected by the development. This discrepancy undermines confidence in the adequacy of the proposed mitigation for these island populations.

Island economies, by their nature, differ markedly from regional averages. Their economic structures are heavily concentrated in sectors reliant on the unique qualities that attract visitors, making them particularly sensitive to any changes in those attributes. Contrary to this reality, the applicant's conclusion that island communities exhibit low sensitivity to tourism-related effects is reached without the benefit of localized, place-specific analysis. Such a conclusion cannot be considered robust evidence but rather an unsubstantiated assumption.

Given these considerations, the methodology employed fails to capture the nuanced vulnerabilities of island communities, and the absence of place-based assessment

leaves the true socio-economic impacts inadequately understood and potentially unaddressed. It is therefore essential that a more detailed and context-specific evaluation be undertaken to ensure that mitigation measures are appropriately targeted and effective for island populations.

The proposal fails to meet the mitigation standards required to protect island communities, as it lacks the necessary assessment and evidence to demonstrate compliance with relevant policy and statutory duties. Specifically, it does not satisfy the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions be founded on robust socio-economic evidence and adopt a precautionary approach when such evidence is insufficient. Furthermore, the proposal does not align with NPF4 Policy 11(c) nor the obligations under the Islands (Scotland) Act 2018, both of which insist on thorough evaluation and meaningful engagement with island communities throughout the planning process. The applicant acknowledged that island communities warrant particular scrutiny but failed to undertake the comprehensive assessment needed to understand the proposal's effects on these communities. Consequently, it has not been demonstrated that the development is compatible with the sustainability of island communities, nor that the statutory duties owed to them have been properly discharged. This non-compliance undermines the proposal's acceptability in planning terms.

1.1.201 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, placing highly sensitive ecological assets directly within the zone of proposed activity. Surrounding waters are also known to support a range of protected species, including seabirds, marine mammals, and basking sharks, which rely on these habitats for feeding, breeding, and migratory pathways. The scale of the proposal is substantial, involving construction, operation, and eventual decommissioning phases extending over several decades, thereby introducing prolonged and potentially cumulative pressures on these environmentally critical components.

Given the ecological significance of the site and adjacent marine environment, the introduction of large-scale industrial activity raises serious concerns regarding adverse environmental effects. The presence of Priority Marine Features within the development footprint, coupled with the usage of surrounding waters by protected species, underscores the need for rigorous assessment and mitigation strategies. Without such measures, the proposal risks causing substantial harm to habitats and species of national and international importance, undermining biodiversity objectives and statutory conservation priorities.

The applicant's submission includes both a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan, specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are typically prepared when there is a possibility that the project may have an adverse effect on the integrity of a protected site. Their inclusion in this application indicates the applicant's recognition of potential impacts that cannot be definitively ruled out. Importantly, the submission of these documents also acknowledges that the Scottish Ministers might ultimately reach a different conclusion regarding the presence of adverse effects. In this context, the applicant's

approach demonstrates an awareness of the sensitivities involved and provides a framework for mitigation and compensation measures should they be deemed necessary. This reflects a responsible stance, though the final determination of adverse impact remains subject to ministerial assessment.

Under the Habitats Regulations, consent for developments affecting protected habitats and species may only be granted where the competent authority has ascertained that the proposal will not adversely affect the integrity of the protected site, unless the stringent derogation tests are satisfied. This requirement demands that no reasonable scientific doubt remains regarding the absence of such adverse effects. The onus of proof lies squarely with the applicant, who must provide robust evidence to meet this high evidential standard. Importantly, proposals for mitigation, compensation, or future monitoring alone cannot substantiate compliance with the statutory tests, underscoring the necessity for conclusive scientific certainty before consent can lawfully be given.

These legal obligations engage not only the Habitats Regulations but also specific policies within the National Marine Plan, notably GEN 9 and GEN 13, as well as Policies 3, 4(b), 4(e), and 4(f) of NPF4. This comprehensive policy framework reinforces the critical importance of safeguarding protected sites and species through rigorous assessment processes. Any development proposal must therefore demonstrate unequivocally that it will not compromise protected site integrity in order to secure consent, reflecting the stringent protections embedded within both statutory and planning policy regimes.

The applicant’s own derogation documents form the primary basis of the evidence submitted in support of the application. However, a careful examination of these documents reveals a significant lack of certainty regarding the satisfaction of the statutory tests that are legally required to protect internationally important habitats and species. The information provided does not adequately demonstrate that the necessary conditions for derogation have been met, raising substantial doubts about the application’s compliance with these critical environmental safeguards. This evidential deficiency is particularly concerning given the stringent nature of the statutory tests designed to ensure that any adverse impacts on internationally designated ecological features are rigorously justified and mitigated.

Consequently, the failure to provide clear, convincing proof that the statutory tests can be satisfied fundamentally undermines the application’s case for consent. Without meeting these legal requirements, the proposed development cannot be considered compliant with the obligations to protect internationally important ecological assets. The absence of demonstrated compliance not only contravenes statutory protections but also weakens the overall planning justification. In light of this, the application should not be granted consent until such time as the applicant can unequivocally establish that all statutory tests have been fully and satisfactorily met.

1.1.202 Cumulative and In-Combination Effects

The current approach to the project’s assessment is fundamentally flawed, as only a portion of the development is presently before the Scottish Ministers. Critical

components, specifically the export cable corridor and the onshore transmission works, which are indispensable for the wind farm's operation, have been deferred to subsequent applications. This fragmentation results in the effects of the entire project never being evaluated in a single, comprehensive process. Consequently, significant elements are subject to separate consenting procedures that follow the principal decision, undermining the integrity of the overall assessment.

Such an approach conflicts with established legal principles, notably those affirmed by the courts in Raeshaw Farms, which require that a project must be assessed in its entirety rather than segmented into smaller parts whose individual impacts might appear less significant. By effectively salami-slicing the project, the assessment fails to capture the cumulative effects and interactions of all components, thereby compromising the robustness and completeness of the environmental and planning evaluation. This procedural deficiency raises serious concerns about the legality and adequacy of the decision-making process in this case.

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

The applicant has failed to demonstrate that the cumulative and in-combination effects of the proposal, including the full scope of the project, have been reliably identified and assessed. This shortcoming is particularly significant given the potential for deferred works to contribute additional environmental impacts that remain unquantified and unconsidered. Such omission undermines the integrity of the environmental impact assessment and obscures the true scale of potential harm.

This failure constitutes non-compliance with established planning policies and regulatory frameworks, specifically engaging GEN 21 and paragraph 4.85 of the National Marine Plan, as well as NPF4 Policy 11(e). Furthermore, it contravenes the requirements of the Environmental Impact Assessment Regulations concerning project splitting, which mandate a comprehensive and integrated assessment of all components of a development to prevent piecemeal consideration that might understate cumulative effects.

In light of these concerns, it is imperative that the decision-making process explicitly addresses the treatment of deferred works to ensure a complete and transparent evaluation. Without this, there remains a material risk that significant environmental effects will be overlooked, justifying refusal of consent until such deficiencies are rectified.

1.1.203 Public Engagement, Site Selection and Environmental Information

The failure to ensure effective public participation has materially compromised the legitimacy of the site-selection process and subsequent application. The applicant requests that the Scottish Ministers place significant weight on the site-selection exercise; however, the deficiencies in public engagement throughout both the plan and site-selection stages have persisted into the current application phase. This application is supported by an extensive volume of technical documentation spanning many thousands of pages, yet the consultation window was scheduled during the busiest months for the island communities concerned. During this peak visitor season, residents are continuously engaged in work and specialist advice becomes scarce, severely limiting their capacity to engage meaningfully with the proposals. In stark contrast, the applicant has benefited from years of preparation supported by substantial professional and financial resources.

Furthermore, the requirements set out in GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, mandate that affected parties must be afforded a realistic opportunity to participate in decisions of this scale. The conditions imposed on the local communities have fallen short of this threshold, undermining the fairness and transparency of the process. In light of these considerations, it is imperative that the Ministers give due weight to these deficiencies when evaluating the representations made. The inadequacy of the consultation process represents a fundamental procedural flaw that calls into question the robustness and legitimacy of the site-selection and application decisions.

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

Moreover, the application frequently relies on future assessments, post-consent plans, monitoring programmes, and additional approvals to address outstanding issues. This approach conflicts with the requirements of the EIA Regulations, which mandate that likely significant effects must be fully understood prior to determination. The Scottish Ministers are required to make decisions based on the evidence before them at the time of determination, rather than on the assumption that unresolved matters will be satisfactorily addressed at a later stage. In this regard, the applicant has not demonstrated that the environmental information submitted is adequate to enable an informed decision.

1.1.204 Effects on Local Area

The applicant's assessment fails to adequately consider the direct and significant effects on the communities of Islay, Colonsay, and Oronsay, leading to an unreliable

evaluation of environmental and heritage impacts. Although the development area lies immediately north-west of Islay and west of Colonsay, the application treats Islay primarily as a potential project location rather than recognising it as an affected island community. This approach overlooks the Atlantic-facing communities that border the nearest edge of the 448 square kilometre development area and neglects any place-based analysis of how the development would affect their setting, local economy, or community life.

For Colonsay and Oronsay, the situation is similarly concerning. The daily lives of these communities are defined by their seaward outlook, which faces the development area directly. Moreover, the North Colonsay and Western Cliffs Special Protection Area, located along Colonsay's own coastline, is central to the applicant's derogation case and compensation plan. This area's inclusion highlights the acknowledged risk of harm to the internationally protected seabird population, which the application admits cannot be ruled out. Such potential ecological damage further underscores the insufficiency of the assessment.

The heritage implications are equally significant. Oronsay Priory, a scheduled monument of national importance, lies within this community's area and is intimately connected to its open maritime setting. The previously identified shortcomings in the heritage assessment apply fully to the treatment of this monument's setting. Taken together, these deficiencies demonstrate that the applicant's evaluation underestimates the effects on local communities, economy, and heritage, thereby undermining the credibility of the overall environmental and heritage impact assessment.

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

undermining the accuracy and robustness of the environmental and social impact evaluation.

While the applicant acknowledges certain significant effects on the Ross of Mull South coastal area, Erraid, and Fionnphort—key locations linked to visitor flows and community experience—the proposed mitigation does not sufficiently address the extent of visual and economic impacts on these sensitive areas. Notably, although the Ross of Mull South is assessed as having high sensitivity with significant effects accepted at distances of approximately 22 to 24 kilometres, the magnitude attributed remains only medium. Similarly, within the Loch na Keal National Scenic Area, characterised by high sensitivity over distances of 21 to 33 kilometres, the applicant limits the magnitude to medium despite recognising significant effects on Core Paths and local landscapes. This reliance on distance-based reasoning, such as dismissing effects on the Wilderness and Gribun Rocks coastal area due to viewing distances exceeding 30 kilometres, fails to adequately capture the scale of change and its implications for these designated landscapes.

Furthermore, the applicant's assessment overlooks the broader economic and community consequences for Mull's west-facing tourism economy and its wildlife boat operations, both of which are intrinsically linked to the unspoiled Atlantic seascape that the development would industrialise. The accommodation and livelihood of western townships, which depend heavily on this natural environment, have not been subject to place-based assessment. This omission undermines a comprehensive understanding of the development's impact on tourism-dependent communities whose economic vitality is closely connected to the visual integrity and experiential quality of the coastal and seascape environment. Therefore, the assessment inadequately addresses the significant visual, economic, and community effects on Mull and Ross of Mull, warranting a more thorough and place-specific evaluation.

The applicant's assessment fails to adequately recognise significant impacts on important designated landscapes and vulnerable island communities, thereby undermining the protection of their natural and cultural qualities. Ulva, situated within the Loch na Keal National Scenic Area, is a community-owned island undergoing regeneration. This small, re-establishing community relies fundamentally on the unspoilt seascape and setting that the development threatens, yet no specific assessment of effects on Ulva has been undertaken. Similarly, Staffa, also within the Loch na Keal National Scenic Area and renowned across Europe, lies approximately 35 kilometres from the development. Despite NatureScot's recommendation to assess effects up to 30 kilometres, the applicant dismisses the impact on Staffa as small and not significant, even though their own analysis acknowledges its panoramic maritime qualities. The Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed at a High sensitivity level from 28 to 32 kilometres distance but is attributed only Medium to Low magnitude effects due to distance and retained landforms, a conclusion that appears to downplay the importance of its defining characteristics. The Scarba, Lunga and the Garvellachs National Scenic Area, located between 35 and 40 kilometres away, is treated similarly. Collectively, these assessments underestimate or omit meaningful effects on designated landscapes and island communities, risking harm to their essential qualities and the viability of fragile local populations.

The applicant's assessment categorises the South Tiree coastal area as having High sensitivity at an approximate distance of 35 kilometres, while attributing a Low magnitude of change to the proposed development. However, this evaluation appears to significantly understate the likely effects on Tiree's landscape character. The island is exceptionally low-lying, with its highest elevation, Ben Hynish, reaching only 141 metres. Its landscape character is fundamentally defined by the dominance of sea and sky, creating an open oceanic horizon that is both sensitive and distinctive. The introduction of turbines up to 335 metres in height would introduce vertical structures unprecedented in this seascape, thereby altering its defining characteristics in a manner not adequately reflected by a Low magnitude rating. Given the exposed nature of Tiree and the prominence such turbines would have within its visual context, the conclusion of Low magnitude does not reliably represent the scale of change anticipated. Consequently, the assessment's evaluation of effects on Tiree's sensitive landscape is insufficiently robust and requires reconsideration to accurately reflect the magnitude of impact.

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

The applicant's distance-based methodology systematically moderates and discounts environmental effects on sensitive receptors located beyond approximately 20 kilometres, resulting in an underestimation of impacts that compromises the environmental impact assessment's integrity. Specifically, the assessment reduces the magnitude of change attributed to highly sensitive receptors at these distances, effectively diminishing the perceived severity of effects. This approach overlooks the lived experiences of communities situated beyond the 20-kilometre threshold, as no place-based assessment has been conducted to capture the specific local impacts they endure. Consequently, the current evaluation fails to provide a comprehensive understanding of the environmental consequences, thereby undermining the robustness and credibility of the overall assessment.

1.1.205 Personal Observations

In addition to the planning matters above, I am personally concerned because: Loss of freedom to roaming and the general loss of the natural environment.

1.1.206 Summary

The proposal for the MachairWind Offshore Wind Farm has failed to demonstrate compliance with the relevant statutory and policy frameworks governing its determination. The applicant's own assessment acknowledges significant impacts on nationally designated landscapes, as well as on the coastal communities and their heritage. However, independent analyses of the applicant's documentation reveal that these effects have been underestimated, and crucially, the necessary heritage assessment has not been conducted. Furthermore, while the proposal identifies potential impacts on the island communities affected, no assessment of these effects has been undertaken. In addition, the ecological requirements associated with the project have not been shown to be capable of being satisfied. It is also pertinent to note that only a portion of the entire project is currently submitted for consideration by the Scottish Ministers.

In light of these substantial shortcomings, it is respectfully urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm and deny the accompanying marine licence. Should the Ministers decide against refusal, it is requested that they require the submission of further environmental information and enhanced visual representations. Moreover, determination of the applications should be deferred until a public inquiry is held, thereby ensuring that the issues raised in this objection receive thorough examination. Regardless of the ultimate decision, it is further requested that the Ministers provide explicit conclusions within their reasoned decision regarding the impacts on cultural heritage and the affected island communities.

Yours faithfully,

[Redacted]

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

Member of the public 523
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, as detailed in application 00012385 seeking consent under section 36 of the Electricity Act 1989, alongside application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. I request that my objection be officially recorded and that I receive notification of the final determination concerning these applications.

The proposals envisage an offshore wind energy development with a capacity of approximately 2 gigawatts, incorporating between 91 and 144 turbines, each reaching up to 335 metres to blade tip. This facility is to be located within a designated Windfarm Development Area encompassing roughly 448 square kilometres of marine environment situated northwest of Islay and west of Colonsay. The site lies approximately 21 kilometres from Iona and lies in proximity to the islands and coastal communities of the southern Hebrides.

The following sections detail the planning and environmental grounds upon which I base my objection, framed by the statutory and policy context relevant to the determination of these applications. It is important to emphasise that the onus lies with the applicant to provide compelling evidence demonstrating compliance with all applicable tests and requirements. There is no requirement for objectors to substantiate the contrary position. In this instance, the applicant has failed to meet this evidentiary burden, and accordingly, the applications should be refused.

1.1.207 Legislative and Policy Framework

The application fails to demonstrate adequate compliance with the statutory duties under Schedule 9 of the Electricity Act 1989, particularly in relation to the requirement to take reasonable steps to mitigate adverse effects on natural beauty, flora, fauna, geological or physiographical features of special interest, and sites, buildings, or objects of architectural, historic, or archaeological interest. Schedule 9 explicitly mandates that both the applicant and the Scottish Ministers must have regard to these considerations and ensure that reasonable mitigation measures are implemented to address any negative impacts arising from the proposal.

The evidence confirms that the applicant has not sufficiently addressed these statutory obligations. There is a clear deficiency in demonstrating how the proposal preserves natural beauty or conserves important ecological and heritage assets. Furthermore, the application lacks adequate detail on reasonable steps taken to mitigate adverse effects on these protected interests. This omission constitutes a failure to meet the legal requirements set out in Schedule 9.

Given that compliance with these statutory duties has not been established, and the application contains significant evidential shortcomings and omissions in relation to the preservation and protection of designated natural and historic features, these factors weigh decisively against the granting of consent. The application, therefore, does not satisfy the mandatory legal framework governing such developments under the Electricity Act 1989.

The marine licence application under consideration is required to be determined in accordance with Part 4 of the Marine (Scotland) Act 2010 and must comply with Scotland's National Marine Plan unless relevant considerations indicate otherwise. The statutory framework explicitly mandates that authorisation decisions adhere to the General Policies set out within the National Marine Plan, including but not limited to GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 addressing Natural Heritage, GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 alongside paragraph 4.85 regarding Cumulative Impacts. These policies collectively form an integral part of the statutory assessment process for the marine licence application.

Upon examination of the application and supporting documentation, it is evident that compliance with these critical policies has not been demonstrated. The evidence submitted fails to adequately address the requirements of the National Marine Plan's General Policies, resulting in identifiable deficiencies and omissions. In particular, the application does not satisfactorily demonstrate how it will ensure co-existence with existing marine users as required by GEN 4, nor does it provide sufficient assessment or mitigation measures concerning impacts on the Historic Environment, Landscape and National Scenic Areas, or Natural Heritage as mandated by GEN 6, GEN 7, and GEN 9 respectively. Furthermore, the engagement process outlined under GEN 18 appears incomplete, and the evidence presented does not meet the standards of soundness and robustness demanded by GEN 19. The cumulative impacts of the proposal, as required to be assessed under GEN 21, have also not been comprehensively evaluated.

Given these significant shortcomings, the application conflicts with the applicable legal and policy framework established by the Marine (Scotland) Act 2010 and the National Marine Plan. The failure to demonstrate compliance with these statutory requirements and the presence of evidential deficiencies weigh decisively against the granting of consent. In accordance with the statutory assessment obligations, the marine licence application should be refused on the grounds that it does not meet the necessary legal and policy standards.

The applicant's submission acknowledges that National Planning Framework 4 (NPF4) is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. The proposal engages several key policies within NPF4, specifically Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy). These policies collectively establish a comprehensive framework aimed at safeguarding biodiversity, protecting natural environments, conserving historic assets, and ensuring sustainable energy development. However, the evidence presented by the applicant fails to demonstrate compliance with these critical policies. There are clear deficiencies and omissions in the application's assessment and mitigation strategies concerning biodiversity and natural places, as well as inadequate consideration of impacts on historic assets. Furthermore, the proposal does not satisfactorily address the requirements of Policy 11 relating to energy, leaving significant uncertainties unresolved.

Given that compliance with NPF4 policies has not been demonstrated, and that the evidence identifies substantive conflicts with the applicable legal and policy framework, these shortcomings must weigh heavily against the granting of planning consent. The failure to meet the explicit requirements of Policies 3, 4, 7, and 11 undermines the proposal's conformity with the statutory planning regime and the overarching objectives of NPF4. In accordance with the guidance set out in the applicant's own evidence, where such deficiencies and conflicts exist, they constitute material considerations that justify refusal. Therefore, the proposal should be refused on the basis that it does not comply with the essential provisions of National Planning Framework 4 and associated statutory duties.

The applicant's submission must be considered in light of the statutory requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations, which mandate that the likely significant environmental effects of the proposal be identified, assessed, and reported prior to any determination. This procedural obligation is fundamental to ensuring that decision-makers have a comprehensive understanding of the environmental consequences before granting consent.

Furthermore, the Habitats Regulations impose a clear duty to assess the effects of the proposal on European protected sites in accordance with the applicable statutory tests. This assessment is not discretionary but a legal requirement designed to safeguard designated habitats and species from adverse impacts arising from development proposals. The absence of a demonstrably compliant Habitats Regulations Assessment undermines the statutory protection afforded to these sites.

In this case, the evidence indicates that compliance with both the Environmental Impact Assessment and Habitats Regulations has not been satisfactorily demonstrated. Deficiencies and omissions in the submitted documentation conflict with the applicable legal and policy framework. As established, where such compliance failures exist, they weigh decisively against the granting of consent. Accordingly, the proposal should be refused on the grounds of inadequate environmental and habitats impact assessment.

The applicant's submission does not demonstrate compliance with the requirements set out in the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be considered and given due weight in the decision-making process. This statutory obligation is clear and unequivocal, as established in the Act itself. The evidence before the determining authority fails to show that these interests have been properly identified, assessed, or integrated into the planning evaluation.

Furthermore, the absence of any substantive analysis or documentation addressing the specific impacts on island communities constitutes a significant omission. This deficiency is not a minor procedural lapse but a fundamental failure to meet the legal and policy framework prescribed by the Islands (Scotland) Act 2018. As a result, the proposal stands in conflict with the statutory duty to consider island communities' interests, undermining the integrity of the decision-making process.

Given these shortcomings, the proposal cannot be regarded as compliant with the applicable legislation. Where such compliance has not been demonstrated, and

where evidence reveals omissions and conflicts with the legal framework, these factors must weigh against the granting of consent. Accordingly, the proposal should be refused on the grounds that it fails to properly consider and weigh the interests of island communities as required by the Islands (Scotland) Act 2018.

There remains significant uncertainty as the applicant has failed to provide robust, objective, and proportionate evidence demonstrating compliance with all relevant statutory duties, planning policies, and environmental assessment requirements. This evidential shortfall undermines confidence that the proposal meets the comprehensive legal and policy framework governing the development.

Given that compliance has not been satisfactorily demonstrated, and the evidence reveals deficiencies and omissions in fulfilling these obligations, these unresolved matters must weigh decisively against the granting of consent. The applicant's failure to discharge the burden of proof required by law and policy renders the proposal unacceptable in its current form.

1.1.208 Conflict with National Planning Framework 4 and the Development Plan

The proposal under consideration fails to meet the impact criteria set out in NPF4 Policy 11, thereby undermining the policy's intended support for renewable energy development. NPF4 Policy 11 explicitly conditions such support on compliance with specific impact tests, including those addressing effects on communities under Policy 11(c), and impacts on landscape, seascape, and other receptors under Policies 11(d) and 11(e). The proposal's shortcomings in these areas are significant and quantifiable, as it would result in substantial adverse effects on nationally designated landscapes and seascapes. Furthermore, the evidence submitted does not satisfactorily demonstrate that the cultural significance of scheduled monuments and their settings would be preserved, nor does it establish that the interests of island communities would be adequately safeguarded. Additionally, the ecological assessments provided fail to confirm that the necessary environmental protections can be achieved.

These deficiencies collectively indicate a clear conflict with the impact criteria integral to NPF4 Policy 11. The policy's support for renewable energy is contingent upon meeting these criteria, which are designed to balance development with environmental and cultural conservation. Without satisfactory evidence to address these critical concerns, the proposal cannot be said to comply with the policy framework. Consequently, it is appropriate to conclude at this stage that the proposal does not align with the requirements of NPF4 Policy 11, and therefore should not be supported in its current form.

The proposal would result in significant adverse effects on nationally designated landscapes and seascapes, undermining the qualities for which these areas have been protected. This practical consequence is directly at odds with the safeguards enshrined in National Planning Framework 4 (NPF4), specifically Policy 11 in conjunction with Policies 4(c) and 4(d), which collectively aim to preserve the intrinsic value of National Scenic Areas and nationally important landscapes.

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

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

The proposal's adverse impacts on landscape, heritage, and community interests, as protected by the Argyll and Bute Local Development Plan 2, indicate a clear conflict with the terrestrial development plan framework. This conflict arises notwithstanding any mitigation measures, which have not been shown to adequately address these effects. Consequently, the proposal is inconsistent with both the local development plan and the National Planning Framework 4 when considered in their entirety, and the applicant has failed to demonstrate otherwise.

1.1.209 Seascape, Landscape and Visual Effects

The applicant's assessment methodology lacks clarity and consistency regarding the distance thresholds beyond which major effects are deemed to cease. Notably, the written methodology provided in Appendix 16.1 fails to specify any such threshold. However, an independent Evidence Note, which draws exclusively on the applicant's Chapter 16 and Appendices 16.1 to 16.3, reveals a clear and consistent pattern across all three assessment streams: no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of that receptor's inherent sensitivity or the extent of visibility. This indicates an implicit, yet unacknowledged, reliance on distance as a controlling factor in determining the scale of impact.

Further examination of the applicant's documents confirms the influence of distance in shaping these assessments. For example, an evaluation of a coastal area located over 30 kilometres from the development site concludes that the scale of change is small, explicitly citing the viewing distance as the rationale. Moreover, the Landscape Character synthesis categorises the magnitude of impact as High within roughly 20 kilometres, Medium between about 20 and 30 kilometres, and Low beyond approximately 30 kilometres for certain landscape types. This systematic moderation of magnitude at the distances where the most sensitive designated landscapes are situated suggests that the protective tests are applied to understated inputs. Consequently, the conclusions drawn do not reliably reflect the true effects that the Scottish Ministers are being asked to consider and consent to.

The applicant's evidence draws upon NatureScot's visualisation guidance, which explicitly recognises the inherent limitations of printed visual materials in

representing the true scale perceived by a viewer on site. This guidance clarifies that while wireline drawings are included within the panoramic projections, they do not serve as independent corrections to the photographic images but rather constitute technical renderings embedded within the same visual framework. Consequently, the visualisations cannot fully replicate the experiential dimensions of the landscape as encountered in reality. This acknowledgement underlines the need for cautious interpretation of visual evidence within the assessment, recognising that such materials provide indicative rather than definitive representations of visual impact.

The applicant's evidence acknowledges that the proposed development will introduce aviation and navigation lighting to a sea horizon that is currently unlit, thereby permanently altering the character of the night-time seascape throughout its operational life of 35 years. This change represents a significant visual impact, as the existing natural darkness will be replaced by artificial illumination, fundamentally transforming the nocturnal environment of the seascape.

Furthermore, the temporal limitation of 35 years does not diminish the policy implications of such harm. Consent for this development effectively constitutes a determination that the seascape is appropriate for wind farm use, thereby establishing a precedent for the acceptability of such character alterations within this marine setting. This has enduring consequences for the protection of seascape character and must be carefully weighed in the decision-making process.

There remains significant uncertainty regarding the proposal's compliance with key planning policies designed to safeguard landscape and seascape interests. The applicant has not adequately demonstrated that its assessment of the scale of the accepted effects aligns consistently with its own stated methodology. This inconsistency raises doubts about the reliability of the conclusions presented and undermines confidence in the assessment's findings.

Moreover, the proposal fails to establish compliance with policies protecting nationally important landscapes and seascapes, specifically those set out in NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. Given this lack of demonstrated conformity, it is evident that the proposal does not meet the requisite policy standards, and accordingly, it should not be supported.

1.1.210 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of heritage impacts fails to comply fully with the required methodology, thereby undermining the reliability of its conclusions regarding the integrity of setting. While the applicant adopts Historic Environment Scotland's recognised methodology, which mandates an evaluation of how changes to setting affect the contribution that setting makes to cultural significance and whether the integrity of setting is retained, the assessment does not demonstrate that it has undertaken this evaluative step. Instead, the assessment predominantly describes visual changes—such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—before concluding that the integrity of setting is adequately retained. This approach conflates visual change with adverse impact, contrary to the methodology's explicit guidance. A Methodological Audit prepared in

support of community objections, analysing the applicant's Appendix 14.3, confirms that while heritage attributes are identified, the critical evaluation of setting integrity required by the methodology is absent from all examined examples.

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

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

Consequently, if the landscape assessment fails to fully capture the extent or severity of landscape impacts, the heritage conclusions derived from it are inherently compromised. This undermines the credibility of the heritage impact analysis and suggests that the overall assessment may not adequately reflect the true scale of harm to heritage assets. Such a foundational shortcoming calls into question the robustness of the conclusions relied upon in support of the proposed development.

The application fails to comply with essential policy requirements regarding the protection of heritage assets, thereby undermining its overall acceptability. Specifically, it engages National Planning Framework 4 (NPF4) Policy 7(h) concerning scheduled monuments, alongside Policies 7(c) and 7(d) addressing the setting of heritage sites, as well as policy GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Despite these clear policy frameworks, the applicant has not provided sufficient evidence to demonstrate that the cultural significance of internationally and nationally important heritage assets, including their settings, will be preserved. Furthermore, the Scottish Ministers have not been presented with the comprehensive assessment required to reach a reasoned conclusion on these matters. In light of these shortcomings, the application does not meet the necessary policy standards for heritage protection and should be refused accordingly.

1.1.211 Effects on Island Communities, Tourism and the Local Economy

There remains considerable uncertainty about the implications of the proposed development for the island communities concerned. These communities rely heavily on visitors whose presence is closely tied to certain distinctive qualities. According to the applicant's own baseline assessments, these include the landscape, seascape, cultural heritage, tranquillity and remoteness that define the area.

Any alterations to these essential qualities pose a direct threat to the economic foundations of these islands. Given the exceptional dependence on visitors, even modest changes could undermine local businesses and services that sustain residents. This in turn raises concerns about population retention and the broader social fabric of these communities.

It is therefore imperative to consider the proposal's potential impact on these fundamental attributes with great caution. The risk of destabilising the economic and social sustainability of island life should weigh heavily in the planning decision. Without assurance that these core visitor-attracting qualities will be preserved, the proposal threatens the ongoing viability of the islands themselves.

While the applicant's assessment methodology addresses potential impacts on port communities with detailed analysis, it notably lacks an equivalent, place-based evaluation of the island communities directly facing the development. The applicant's own consultants acknowledged habitability as a potentially significant pathway affecting these island communities; however, no specific assessment of island habitability was conducted. Instead, the socio-economic assessment in Chapter 18 operates at a broad regional level and concludes that island communities exhibit low sensitivity to tourism effects. This approach is fundamentally flawed because small island economies cannot be accurately represented by regional averages. Their economies are concentrated in sectors highly vulnerable to changes in the attributes that attract visitors, and an increasing reliance on visitor numbers exacerbates their sensitivity rather than diminishes it. Therefore, the conclusion of low sensitivity, derived without any place-based analysis, constitutes an unsupported assumption rather than evidence. Consequently, the applicant's socio-economic assessment is inadequate to understand or mitigate the true impacts on island communities.

In comparison to the rigorous mitigation requirements set out for environmental and socio-economic impacts elsewhere in the proposal, the assessment of effects on island communities is notably deficient. The proposal fails to meet the statutory and policy obligations established to protect these communities. Specifically, the National Marine Plan's GEN 19 and paragraph 4.81 mandate that decisions affecting marine environments must be founded on robust socio-economic evidence and adopt a precautionary approach where data is insufficient. Moreover, NPF4 Policy 11(c) alongside the Islands (Scotland) Act 2018 explicitly require that the interests of island communities be thoroughly assessed and afforded due weight through meaningful engagement from the earliest stages through to the conclusion of the decision-making process.

Despite recognising the particular scrutiny island communities require, the applicant did not undertake the necessary assessment to understand how the proposal would

affect them. No evidence has been provided to demonstrate compatibility with the principles of sustainable island communities, nor that the statutory duties owed to these populations have been fulfilled. As such, the proposal falls short of the established planning and statutory standards, undermining the protection and consideration that island communities are entitled to under current policy and legislation.

1.1.212 Ecology, Biodiversity and Habitats Regulations

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

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan, specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents represent recognised mechanisms intended to address potential adverse impacts on protected sites when it cannot be conclusively ruled out that the proposal would maintain site integrity. Their inclusion signals the applicant's awareness of possible significant effects and a preparedness to implement measures in line with derogation provisions.

It is important to understand that such submissions are typically prepared for situations where adverse effects on the integrity of a protected site are uncertain or likely. The presence of these documents within the application is a critical feature, as it highlights that the applicant does not categorically exclude the possibility of harm. This is a prudent step intended to facilitate regulatory consideration and possible mitigation, reflecting an approach that accounts for ecological sensitivities and the need for compensatory action.

Nevertheless, the applicant acknowledges that Scottish Ministers may arrive at a different conclusion regarding adverse effects than the applicant's own assessment. This recognition underscores that the submitted derogation and compensation documents serve as precautionary and responsive measures rather than definitive proof of no impact. In this context, the documents form a necessary part of the application's overall environmental evaluation, contributing to informed decision-making about the proposal's acceptability and the adequacy of proposed mitigation.

While mitigation, compensation measures, and future monitoring are often proposed to address potential impacts on protected habitats, these alone do not satisfy the stringent legal requirements set out under the Habitats Regulations. Consent for developments affecting such sites can only be lawfully granted where the competent authority is assured that the proposal will not adversely affect the integrity of the protected site, and no reasonable scientific doubt remains. This high evidential

standard places the burden firmly on the applicant to demonstrate compliance, rather than relying solely on mitigation proposals. This framework is reinforced by relevant policies, including GEN 9 and GEN 13 of the National Marine Plan, alongside NPF4 Policies 3, 4(b), 4(e), and 4(f), which collectively emphasize the necessity for robust scientific certainty before consent can be given. In light of these clear legal and policy imperatives, any development proposals must rigorously meet these standards to secure lawful consent.

The practical consequence of the applicant's failure to demonstrate compliance with the statutory tests is that the proposed development cannot be lawfully approved without risking harm to internationally important habitats and species. A detailed examination of the submitted evidence, including the applicant's own derogation documents, reveals an absence of sufficient certainty that the necessary legal protections will be upheld. This lack of demonstrable compliance undermines the statutory framework designed to safeguard these ecological features. Consequently, the application falls short of the legal requirements, and consent should therefore be withheld.

1.1.213 Cumulative and In-Combination Effects

The current approach to the project's assessment is fundamentally flawed, as only a portion of the development is presently before the Scottish Ministers. Critical components, specifically the export cable corridor and the onshore transmission works, which are indispensable for the wind farm's operation, have been deferred to subsequent applications. This fragmentation results in the effects of the entire project never being evaluated in a single, comprehensive process. Consequently, significant elements are subject to separate consenting procedures that follow the principal decision, undermining the integrity of the overall assessment.

Such an approach conflicts with established legal principles, notably those affirmed by the courts in Raeshaw Farms, which require that a project must be assessed in its entirety rather than segmented into smaller parts whose individual impacts might appear less significant. By effectively salami-slicing the project, the assessment fails to capture the cumulative effects and interactions of all components, thereby compromising the robustness and completeness of the environmental and planning evaluation. This procedural deficiency raises serious concerns about the legality and adequacy of the decision-making process in this case.

The cumulative impact assessment relies heavily on the foundational conclusions drawn within the broader Environmental Impact Assessment, particularly those relating to landscape, heritage, and socio-economic factors. Where these initial assessments have understated the magnitude of effects, the cumulative analysis inherently adopts the same diminished baseline. This approach results in a compounded underestimation of the combined impacts when considering this proposal alongside other developments that are existing, consented, or foreseeable. Consequently, the mitigation measures proposed may appear more effective than they truly are, as they are based on an incomplete understanding of the baseline conditions.

The flaw in the baseline assessments is critical because it sets the parameters against which all subsequent cumulative impacts are measured. If the starting point is inaccurately low, the additive or synergistic effects of multiple developments will not be fully captured. This raises concerns regarding the reliability of the cumulative assessment, as it may fail to identify the true scale and significance of impacts on the environment and local communities. Without a robust and accurate baseline, any conclusions about the effectiveness of mitigation or the acceptability of cumulative effects are necessarily compromised.

In light of these considerations, it is essential that the cumulative impact assessment be revisited with a more accurate and comprehensive baseline. Only through a thorough reassessment can a reliable understanding of combined effects be established, ensuring that mitigation measures are appropriately targeted and effective. Until such steps are taken, the current cumulative assessment should be regarded as insufficiently robust to support planning decisions with confidence.

The applicant's failure to adequately address the cumulative and in-combination effects of the proposal falls short of the mitigation standards required by relevant planning policies and environmental regulations. This deficiency engages GEN 21 and paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), as well as the Environmental Impact Assessment Regulations concerning project splitting. Crucially, the assessment does not reliably identify or evaluate the overall effects of the project, including deferred works. It is therefore imperative that the decision-making process explicitly considers these deferred elements to ensure full compliance with policy and regulatory requirements.

1.1.214 Public Engagement, Site Selection and Environmental Information

There is considerable uncertainty surrounding the adequacy of public participation in the site-selection process, which the applicant urges the Scottish Ministers to weigh heavily. The quality of engagement at both the plan and site-selection stages exhibits notable deficiencies that have persisted into the current application phase. Given the extensive volume of technical documentation—comprising many thousands of pages—and the timing of the consultation during the island communities' busiest months, when residents are occupied with continuous work throughout the visitor season and access to specialist advice is limited, the opportunity for meaningful participation has been severely constrained. This contrasts starkly with the applicant's prolonged preparation period and substantial professional and financial resources.

The importance of effective public participation in decisions of this scale is underscored by GEN 18 of the National Marine Plan and the principles enshrined in the Aarhus Convention. These require that those affected are afforded a realistic opportunity to contribute to the decision-making process. Unfortunately, the circumstances under which the local communities have been expected to respond fall short of these established standards.

In light of these concerns, it is essential that the Scottish Ministers give careful consideration to the limitations of the consultation process when evaluating the representations submitted. The legitimacy of the site-selection process depends

significantly on ensuring that public participation is both meaningful and accessible, and this has not been demonstrably achieved in the present case.

The practical consequence of the current Environmental Impact Assessment (EIA) is that the Scottish Ministers are unable to make an informed decision on the application due to insufficient environmental information. The EIA is the principal evidential basis for determination, and the critical issue is not the extent of the assessment but its adequacy. The application identifies potential pathways to significant effects across multiple topics but fails to investigate them comprehensively. For example, the landscape assessment produces outcomes based on a distance pattern that is not supported by its own stated methodology; the heritage assessment does not demonstrate the application of its integrity test; and the socio-economic assessment lacks any place-based analysis relevant to the affected islands.

Furthermore, the application relies in certain instances on future assessments, post-consent plans, monitoring, and additional approvals to address environmental effects. However, these measures do not negate the requirement under the EIA Regulations that likely significant effects must be fully understood prior to determination. The regulatory framework clearly mandates that the environmental impacts should be adequately assessed and made available at the time of decision-making, rather than deferred to later stages of the process.

In conclusion, the Scottish Ministers are obliged to determine the application based on the evidence presently before them. The applicant has not demonstrated that the environmental information submitted satisfies this requirement. Without sufficient and robust environmental data, any determination risks being made on an incomplete understanding of likely significant effects, which undermines the statutory purpose of the EIA and the integrity of the decision-making process.

1.1.215 Effects on Local Area

The applicant’s assessment recognises Islay and Colonsay as the closest islands to the proposed development area, which lies immediately north-west of Islay and west of Colonsay. However, the assessment predominantly considers Islay in terms of its potential role as a direct project location rather than as an affected island community in its own right. This approach overlooks the proximity of the development’s Atlantic-facing edge to Islay’s communities and neglects any place-based evaluation of the effects on their setting, economy, or community life within the 448 square kilometre development zone. Such an omission significantly undermines the reliability of the environmental and heritage impact evaluation, given the integral relationship between these communities and their maritime environment.

Colonsay and Oronsay are similarly impacted, with their daily life defined by a seaward outlook facing the development array directly. The North Colonsay and Western Cliffs Special Protection Area, located along Colonsay’s coastline, is the focus of the applicant’s derogation case and compensation plan, implicitly acknowledging that harm to the internationally protected seabird population cannot be excluded. Furthermore, Oronsay Priory, a scheduled monument of national importance situated within this community, is subject to the same deficiencies

identified in the heritage assessment, particularly regarding the treatment of its open maritime setting. These gaps further call into question the thoroughness and accuracy of the applicant's evaluation of direct and significant effects on the heritage and environment of these islands.

The applicant's assessment of the visual and community impacts on Iona significantly underestimates the scale and importance of these effects, particularly when mitigation measures are considered. The Coastal Character assessment identifies the Sound of Iona as having high sensitivity with direct orientation towards the development area and extensive visibility. It notes a large geographical extent of change, moderate and significant overall effects extending approximately 21 kilometres, with turbines spanning roughly 39 degrees of the horizon. While the applicant acknowledges significant effects for residents and visitors across much of Iona, including at Dùn Ì, the island's highest point, the assessment fails to fully capture the scale of visual intrusion. For context, the largest turbines would exceed the height of Ben Hynish on Tiree—141 metres high and visible from Iona at about 33 kilometres—by approximately 194 metres, despite being located closer at roughly two-thirds of that distance. This comparison emphasises the turbines' imposing presence and challenges the adequacy of the applicant's mitigation claims.

Beyond visual impacts, the heritage and community implications are equally significant and insufficiently addressed. Iona's internationally important monastic landscape, including the Abbey, Nunnery and high crosses, is intrinsically linked to pilgrimage, arrival by sea, and movement through the landscape, as identified in the applicant's own baseline studies. Historic Environment Scotland's request for additional viewpoints, such as from the ferry crossing and elevated locations like Càrn Cùl ri Èirinn above St Columba's Bay, remains unmet, leaving a critical gap in the visual impact appraisal. Moreover, a household consultation on Iona revealed that 92 per cent of respondents object to the proposal, underscoring strong local opposition. Despite the applicant's recognition of habitability as a potential pathway of effect on the community, no formal assessment of this impact was undertaken. Taken together, these factors indicate that the applicant's evaluation inadequately reflects the profound visual, heritage and social consequences for Iona, thereby compromising the accuracy and robustness of the environmental and social impact appraisal.

The applicant's assessment underestimates the practical impacts on the coastal communities and landscapes of Mull and Ross of Mull, particularly regarding their tourism-dependent economies and designated scenic areas. For instance, the Ross of Mull South coastal area is acknowledged as highly sensitive and experiences significant effects at key locations such as Erraid and the Core Paths of the Ross. Fionnphort, serving as the gateway to Iona and a crucial embarkation point for visitors, is identified as the community most directly affected by visitor flows, yet no dedicated place-based assessment has been provided for it. Similarly, significant effects are accepted across Mull's Core Paths and within important local landscape areas, including the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, recognised for its high sensitivity throughout a viewing range of 21 to 33 kilometres, is only attributed medium magnitude effects, which does not fully reflect the potential for adverse impacts. The applicant's reliance on distance as a primary factor, such as in the case of the Wilderness and Gribun

Rocks coastal area where changes at over 30 kilometres are deemed small, oversimplifies the complex visual and experiential qualities that contribute to these landscapes' value. Moreover, the west-facing tourism economy, including wildlife boat operations and accommodation sectors reliant on the Atlantic seascape, faces potential industrialisation from the development, yet none of these communities have been afforded a place-specific assessment. This gap in the evaluation risks overlooking significant economic and community consequences that should be carefully considered in the planning decision.

The applicant's assessment of the potential impacts on the wider seaboard designated landscapes and island communities appears to underestimate the significance of effects and omits critical considerations relating to vulnerable communities. While some mitigation measures are acknowledged, they do not fully address the specific sensitivities of these areas. For instance, Ulva, situated within the Loch na Keal National Scenic Area, is a community-owned island in the early stages of regeneration. Its recovery depends heavily on the preservation of its unspoilt seascape and setting, yet the applicant has failed to conduct any assessment of the effects on this small, re-establishing community.

Similarly, Staffa, also within the Loch na Keal National Scenic Area and recognised as one of the most celebrated small islands in Europe, lies approximately 35 kilometres from the development site. This distance exceeds the 30-kilometre range within which NatureScot requested that the qualities of National Scenic Areas be assessed. Despite this, the applicant concludes that the scale of change on Staffa would be small and the effect not significant, even though their own assessment acknowledges the island's panoramic maritime qualities. This inconsistency raises concerns about the adequacy of the evaluation.

Further designated landscapes such as the Jura National Scenic Area, assessed at 28 to 32 kilometres distance, are attributed only medium to low magnitude effects, primarily due to distance and retained landforms. However, Jura's designation relies on its wild and undeveloped Atlantic outlook, which may be more vulnerable to change than the assessment suggests. The Scarba, Lunga, and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres away, receive a similar treatment, which may similarly understate the potential impacts. Overall, the applicant's approach does not fully recognise the importance of these seascapes and island communities, thereby undermining the protection of their natural and cultural qualities.

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

Tiree's landscape is uniquely defined by its exceptionally low-lying topography, with the highest elevation at Ben Hynish reaching only 141 metres. The island's character is intrinsically linked to its open oceanic horizon and the dominance of sea and sky.

The introduction of turbines up to 335 metres tall would introduce unprecedented vertical elements into this seascape, fundamentally altering the visual experience. Such a significant alteration to a sensitive receptor's setting cannot be accurately captured by a Low magnitude of change, indicating that the assessment's conclusions lack reliability.

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

While the applicant's assessment applies distance-based moderation to mitigate perceived effects on seascape receptors, this approach overlooks significant impacts on mainland and island communities that have direct visual and economic connections to the development area. For instance, Gigha, a community-owned island renowned nationally for its regeneration, faces the development from the east; yet, the effects on its delicate community balance and local economy have not been examined. Similarly, Ardnamurchan Point—the westernmost tip of the British mainland—offers panoramic views along the Hebridean seaboard, attracting visitors throughout the peninsula. These seaward panoramas represent precisely the receptors that the distance-based mitigation seeks to moderate, calling into question the adequacy of such an approach. Furthermore, the chain of communities along the west coast of Kintyre, whose identity and visitor economy are closely tied to the open Atlantic seaboard facing Islay, Jura, and adjacent waters, along with the Treshnish Isles and other small islands and mainland coasts viewing the development area, have not been fully accounted for. Taken together, these omissions indicate that the applicant's assessment lacks the necessary comprehensiveness regarding the effects on these sensitive and economically reliant communities.

There remains significant uncertainty regarding the applicant's approach to assessing environmental effects beyond 20 kilometres. The evidence clearly shows a consistent pattern whereby, whenever a highly sensitive receptor is located beyond this distance threshold, the assessment systematically moderates the magnitude of change and discounts the resulting effect. Crucially, this approach means that the communities actually experiencing these effects have not been subject to any place-specific evaluation. Such a methodology fundamentally undermines the integrity of the environmental impact assessment by failing to provide a comprehensive and accurate account of impacts on sensitive receptors at greater distances. It is therefore essential that the assessment be revisited to ensure that all affected communities receive proper consideration.

1.1.216 Summary

The proposal submitted fails to demonstrate compliance with the relevant statutory and policy frameworks governing its determination. The applicant's own assessment acknowledges significant impacts on nationally designated landscapes, as well as on the coastal communities and their heritage. Furthermore, analysis of the applicant's published documents reveals that these impacts have been understated. Crucially,

the necessary heritage assessment has not been undertaken. Although the effects on the island communities affected by the project were identified, they have never been properly evaluated. Additionally, the ecological criteria required for consent have not been proven achievable. It should also be noted that only a portion of the development is currently before the Scottish Ministers for consideration.

In light of these deficiencies, it is respectfully urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm proposal, along with the associated marine licence application.

Should the Ministers decide against refusal, it is requested that they require the submission of further environmental information and enhanced visualisations. It is also recommended that the applications be determined only following a public inquiry, during which the issues raised in this objection can be thoroughly scrutinised. Regardless of the final decision, it is further requested that the Ministers explicitly state their conclusions concerning the impacts on cultural heritage and the affected island communities within their stated reasons.

Yours faithfully,

[Redacted]

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

Member of the public 524
Dear Sir/Madam,

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

The project envisages the development of an offshore wind farm with an installed capacity of approximately 2 gigawatts. It involves the installation of between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip. The site lies within a Windfarm Development Area spanning around 448 square kilometres of sea to the north-west of Islay and west of Colonsay, situated roughly 21 kilometres from Iona and in proximity to the islands and coastal communities of the southern Hebrides.

My opposition is grounded in planning and environmental considerations, assessed against the statutory and policy frameworks governing these applications. It is incumbent upon the applicant to provide compelling and sufficient evidence demonstrating compliance with all relevant planning tests. The onus is not on objectors to prove the contrary. Having examined the evidence submitted, I conclude that the applicant has failed to meet this burden of proof and that consent ought to be refused.

1.1.217 Seascape, Landscape and Visual Effects

The applicant’s assessment methodology fails to define a distance threshold beyond which major effects cease, yet their own analysis reveals a consistent pattern: no highly sensitive receptor beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of sensitivity or visibility. This is evident in the applicant’s documentation, which notes that for a coastal area over 30 kilometres away, the scale of change is judged small due to viewing distance, and the Landscape Character synthesis categorises magnitude as High within about 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. Consequently, the protective tests rely on inputs that systematically moderate magnitude at precisely the distances where the most sensitive designated landscapes are situated. This undermines the reliability of the conclusions presented to the Scottish Ministers, as the true effects on these landscapes are likely understated.

When comparing the proposed mitigation measures, it is important to recognise that the visualisation materials submitted in support of the assessment possess inherent limitations that affect their reliability as a tool for fully understanding visual impacts. NatureScot’s visualisation guidance, which the applicant has followed, explicitly states that printed visualisations cannot replicate the true scale perceived by a viewer in the field. This fundamental shortcoming means that any mitigation strategies evaluated primarily through such visualisations may not reflect the actual visual experience on site.

Furthermore, the wireline drawings included within the panoramic projections are subject to the same constraints as the accompanying photography. They serve as a technical rendering within the overall visualisation package rather than functioning as an independent means to correct or enhance visual accuracy. Consequently, reliance on these materials without acknowledging their technical and perceptual limitations risks underestimating or misrepresenting the visual effects of the development. This calls for caution in drawing firm conclusions from the visual evidence as currently presented.

The applicant's evidence acknowledges that the proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration of the night-time seascape character throughout the stated 35-year operational life. This fundamental change would transform the visual experience of the seascape after dark, introducing new and continuous light sources where none presently exist.

Furthermore, the temporal limitation of 35 years does not mitigate the policy implications of this harm. Consent for the development would signify a policy judgement that the seascape is appropriate for wind farm use, thereby accepting the permanent alteration to its character. This recognition underscores the lasting significance of the lighting effects on the night-time seascape, beyond the operational timeframe.

The applicant's proposals fail to demonstrate adequate mitigation in relation to the significant effects identified on nationally important landscapes and seascapes. While some measures have been suggested, these are insufficient when assessed against the requirements set out in NPF4 Policies 4(c) and 4(d), 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. The absence of robust mitigation measures undermines confidence that the proposal can appropriately safeguard the visual and environmental qualities these policies seek to protect.

Furthermore, the applicant has not substantiated that its conclusions regarding the scale of the accepted effects align with the methodology employed in its own assessments. This lack of consistency raises serious concerns about the reliability of the environmental impact evaluation and, by extension, the proposal's compliance with key planning policies aimed at conserving nationally important landscape and seascape interests. In light of these shortcomings, the proposal does not meet the necessary policy standards and should not be supported.

1.1.218 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment fails to demonstrate compliance with the required methodology for evaluating impacts on the setting of historic assets, thereby undermining the reliability of its conclusions regarding heritage harm. Although the applicant adopts Historic Environment Scotland's established methodology—developed through consultation and requiring a specific evaluative step to determine whether changes affect the contribution setting makes to cultural significance and whether the integrity of setting is retained—the published Methodological Audit identifies a critical omission. The Audit, based solely on the applicant's Appendix

14.3, finds that while the operational assessment describes visual changes such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it does not show how the integrity of setting has been assessed in line with the methodology's explicit requirement. Instead, the assessment concludes without evidencing this evaluative step, leaving the claimed retention of setting integrity unsubstantiated. This fundamental gap calls into question the robustness of the applicant's heritage impact conclusions.

The applicant's assessment acknowledges that the cultural significance of the affected heritage assets stems from experiential qualities such as pilgrimage, arrival by sea, and movement through a living cultural landscape, including the interrelationships between monuments, spirituality, and the surrounding landscape and seascape. However, the proposed mitigation measures appear insufficient in addressing these dynamic and experiential aspects, as they focus predominantly on fixed viewpoints rather than the broader cultural landscape experienced through movement. This limitation risks an incomplete understanding and inadequate protection of the heritage assets' full significance.

Furthermore, Historic Environment Scotland's consultation responses, as recorded in the application, highlight the need for additional viewpoints to adequately represent these wider cultural qualities. The absence of such comprehensive viewpoints undermines the assessment's ability to capture the nuanced relationships and experiential values critical to the heritage assets. Consequently, the applicant's current approach does not fully reflect the cultural baseline, thereby compromising the robustness of the heritage impact evaluation. It is essential that these broader qualities are properly incorporated to ensure an accurate and respectful appraisal of heritage impacts.

The practical consequence of relying on the existing landscape assessment is that any understatement of landscape effects directly compromises the reliability of the heritage impact conclusions. If the landscape assessment fails to fully capture the extent or significance of visual or environmental changes, then the subsequent heritage evaluation, which depends upon those landscape findings, will similarly present an incomplete or diminished picture of the true effects on heritage assets. This interdependency means that the heritage conclusions cannot be viewed in isolation but must be critically examined in the context of the preceding landscape analysis.

Furthermore, the heritage conclusions inherit the deficiencies present in the landscape assessment, leading to a systematic understatement of potential harm. Without an accurate and comprehensive landscape assessment, the evaluation of heritage impacts risks overlooking or downplaying adverse effects that may have material significance. Therefore, the credibility of the heritage impact conclusions is fundamentally undermined by the shortcomings in the landscape assessment, calling into question the robustness of the overall appraisal as it currently stands.

The application fails to demonstrate compliance with key policy requirements essential for the protection of heritage assets, notably engaging NPF4 Policy 7(h) concerning scheduled monuments and Policies 7(c) and 7(d) relating to their settings, as well as GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan.

Critically, the applicant has not provided sufficient evidence to confirm that the cultural significance of internationally and nationally important heritage assets and their settings will be preserved. Consequently, the Scottish Ministers lack the necessary assessment to conclude that these heritage assets will be adequately protected. In light of this, the proposal does not meet the requisite policy standards for heritage protection and should therefore be deemed unacceptable.

1.1.219 Effects on Island Communities, Tourism and the Local Economy

The island communities subject to this proposal rely to an exceptional degree on visitors, whose presence is directly linked to the intrinsic qualities identified in the applicant's own baselines: landscape, seascape, cultural heritage, tranquillity, and remoteness. These attributes are not incidental but foundational to the islands' economic vitality, underpinning the visitor economy that sustains local businesses, services, and employment opportunities.

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

The applicant's own consultants acknowledge that habitability constitutes a potentially significant pathway through which the proposal could impact island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic appraisal presented in Chapter 18 focuses predominantly on the regional scale, providing detailed examination of potential port communities but omitting an equivalent place-based analysis for the island communities most directly facing the development. This approach nonetheless leads to the conclusion that these island communities possess low sensitivity to tourism effects.

However, this conclusion warrants careful scrutiny. Small island economies are not simply reflective of regional averages; rather, their economic structures are often heavily concentrated in sectors that are particularly vulnerable to changes in the characteristics that attract visitors. Moreover, their reliance on increasing visitor numbers does not serve to mitigate this sensitivity but rather intensifies dependence on the very qualities that may be at risk from the proposed development. Therefore, the assessment's failure to conduct a place-based analysis undermines the validity of the low sensitivity conclusion.

In light of this, the socio-economic assessment methodology employed by the applicant is flawed and insufficient for understanding or mitigating the potential impacts on island communities. A more detailed, island-specific evaluation is necessary to accurately capture the sensitivity and vulnerabilities of these communities, ensuring that any consequential effects are properly identified and addressed. Without such an approach, the assessment risks overlooking significant adverse socio-economic consequences.

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

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

In conclusion, the statutory duties owed to island communities have not been discharged, and the proposal does not demonstrate compliance with the relevant planning policies. Given these deficiencies, the proposal cannot be considered acceptable in its current form. It is therefore respectfully requested that it be refused on the grounds of non-compliance with policy and statutory obligations regarding the protection of island communities.

1.1.220 Ecology, Biodiversity and Habitats Regulations

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

The applicant's submission of a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan has practical consequences for the assessment of the proposed development. These documents acknowledge the potential for adverse effects on the guillemot population within the North Colonsay and Western Cliffs Special Protection Area, signalling that the applicant does not categorically rule out impacts on the site's integrity. The preparation and inclusion of such derogation and compensation measures indicate an intention to address these potential impacts through established regulatory mechanisms, should they be deemed unavoidable.

However, it is important to recognise that the submission of these documents also reflects an inherent uncertainty in the applicant's assessment. By their own approach, the Scottish Ministers may reach a different conclusion on whether adverse effects can be excluded, underscoring that the application relies on conditional mitigation rather than definitive avoidance. This distinction is critical in evaluating the robustness of the proposed measures and the likelihood that they will satisfactorily protect the integrity of the protected site.

The applicant acknowledges that under the Habitats Regulations, consent for developments affecting protected sites may only be granted where the competent authority has ascertained that the proposal will not adversely affect the integrity of the site, unless the stringent derogation tests are satisfied. It is emphasised that consent can lawfully be granted only where no reasonable scientific doubt remains regarding potential impacts. The burden of proof lies with the applicant to demonstrate this high evidential standard.

Furthermore, the applicant recognises that mitigation, compensation proposals, and future monitoring, while important, do not by themselves satisfy the statutory tests required under the Habitats Regulations. This rigorous approach ensures that all potential effects on protected habitats and species are thoroughly assessed before any consent is granted, reflecting the precautionary principle embedded within the legislation.

This legal framework is supported and reinforced by relevant policy provisions, including GEN 9 and GEN 13 of the National Marine Plan and Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. Together, these policies establish a comprehensive and robust framework to safeguard protected sites, ensuring that decisions on consent are made with the utmost regard to environmental protection and legal compliance.

The applicant's submissions, including their own derogation documents, fall short of demonstrating that the statutory tests designed to safeguard internationally important habitats and species are met. The evidence indicates a significant lack of certainty regarding the effectiveness of proposed mitigation measures, undermining confidence that adverse impacts can be adequately avoided or compensated.

Given this failure to satisfy the rigorous legal requirements, the application does not provide a sound basis for granting consent. Without clear and demonstrable compliance with these statutory protections, approval would be inconsistent with the necessary safeguards for internationally important ecological features.

1.1.221 Cumulative and In-Combination Effects

The practical consequence of considering only a portion of the project at this stage is that a comprehensive evaluation of its overall impacts is fundamentally undermined. The export cable corridor and the onshore transmission works, which are essential for the wind farm's operation, are not included in the current application but are instead deferred to future consenting processes. This fragmentation means that the Scottish Ministers are making decisions without full knowledge of the cumulative

effects, potentially overlooking significant environmental and operational implications that only become apparent when all components are assessed together.

This approach runs counter to established legal principles governing environmental assessment. The courts, notably in the Raeshaw Farms case, have affirmed that a project must be assessed in its entirety rather than being divided into smaller parts whose individual impacts might appear less significant. By effectively “salami-slicing” the project, the current methodology diminishes the perceived scale and consequence of the development, which could result in inadequate mitigation measures and insufficient scrutiny of the project’s true footprint and effects on the environment and local communities.

Therefore, it is imperative that the assessment process be reconsidered to encompass all interdependent elements of the project simultaneously. Only through a holistic evaluation can decision-makers fulfil their statutory duties and ensure that all potential impacts are properly identified, understood, and addressed. Failing to do so risks setting a precedent that undermines the integrity of the planning system and the protections it affords to the environment and public interest.

The applicant’s Environmental Impact Assessment (EIA) forms the foundation for the cumulative impact assessment presented in the proposal. This approach inherently relies on the conclusions drawn in the separate landscape, heritage, and socio-economic assessments. However, it is apparent that these underlying assessments have understated the magnitude of effects in each respective area. Such understatement consequently results in the cumulative assessment being founded on a diminished baseline, which does not fully reflect the true environmental and social context prior to the proposed development.

Because the cumulative assessment builds upon this reduced baseline, the combined effects of the current proposal alongside other existing, consented, and foreseeable developments are similarly underestimated. This means that the overall impact on the environment and communities within the area is likely greater than that reported. The failure to capture the full extent of these combined effects undermines the reliability of the cumulative impact assessment and may lead to inadequate mitigation measures being proposed.

Given the importance of an accurate and comprehensive understanding of cumulative effects in planning decisions, this underestimation raises concerns regarding the robustness of the environmental appraisal. It is essential that baseline assessments accurately reflect the existing conditions to ensure that cumulative impacts are fully and fairly evaluated. Without this, the decision-making process may not fully consider the true scale of change resulting from the proposal when combined with other developments, potentially compromising the sustainability objectives of the planning framework.

The applicant has failed to demonstrate that the cumulative and in-combination effects of the proposal, including the deferred works, have been reliably identified and assessed, contrary to the requirements set out in GEN 21 and paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the Environmental Impact Assessment Regulations concerning project splitting. This omission undermines

compliance with relevant planning policies and environmental regulations. Consequently, it is essential that the decision-making process expressly addresses the treatment of the deferred works to ensure a comprehensive and lawful assessment. Without this, the application remains incomplete and cannot be properly determined.

1.1.222 Public Engagement, Site Selection and Environmental Information

The applicant invites Scottish Ministers to attribute significant weight to the site-selection process; however, this process has been fundamentally compromised by deficiencies in public participation. The consultation accompanying the application encompasses many thousands of pages of highly technical material, yet the consultation period coincided with the busiest months for island communities. During this peak visitor season, residents are engaged in continuous work, and access to specialist advice is severely limited. In stark contrast, the applicant has benefited from years of preparation supported by substantial professional and financial resources. This imbalance has effectively restricted the capacity of the affected communities to engage meaningfully with the proposals.

National policy and international principles underscore the necessity for effective public participation in decisions of such magnitude. GEN 18 of the National Marine Plan, alongside the Aarhus Convention's requirements, mandates that those impacted must have a realistic and fair opportunity to contribute to the decision-making process. The conditions under which the local communities have been expected to respond fall short of this standard, undermining the legitimacy of the consultation. It is therefore imperative that Ministers recognise these shortcomings in participation when considering the representations submitted, as the quality and timing of public engagement bear directly on the integrity of the entire site-selection process.

The Environmental Impact Assessment (EIA) submitted with this application is insufficient for the Scottish Ministers to make an informed decision. While the assessment is extensive in scope, it fails to adequately investigate identified pathways to significant effects. For instance, the landscape assessment applies a distance pattern not supported by its own methodology, the heritage assessment does not demonstrate adherence to its integrity test, and the socio-economic assessment lacks a place-based analysis of the affected islands. These deficiencies undermine the reliability of the conclusions reached.

Furthermore, the application depends in part on future assessments, post-consent plans, monitoring, and additional approvals to address uncertainties. However, reliance on these measures does not satisfy the EIA Regulations, which require that likely significant effects be understood and clearly evidenced prior to determination. Deferring resolution of key issues until after consent would be contrary to statutory requirements.

In light of these matters, the Scottish Ministers must base their decision solely on the evidence presently before them. The applicant has not demonstrated that the environmental information submitted is adequate for that purpose. Therefore, the application should not be approved in its current form.

1.1.223 Effects on Local Area

The applicant's assessment recognises Islay and Colonsay as the closest islands to the proposed development, which lies immediately north-west of Islay and west of Colonsay. However, the evaluation principally approaches Islay as a potential project location rather than considering it as a distinct island community that will be directly affected. Notably, the Atlantic-facing communities of Islay are situated adjacent to the nearest edge of the 448 square kilometre development area, yet the application fails to provide a place-based assessment of how this proximity will impact the community's setting, economy, or daily life. This omission raises concerns about the thoroughness of the environmental and social impact analysis for Islay, given its unique exposure and relationship to the development site.

For Colonsay and Oronsay, the seaward outlook is integral to daily life, directly facing the proposed array. The North Colonsay and Western Cliffs Special Protection Area, located on Colonsay's coastline, is central to the applicant's derogation case and compensation strategy, acknowledging that harm to the internationally protected seabird populations of these cliffs cannot be entirely ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance, lies within this community and is vulnerable to impacts on its open maritime setting. The shortcomings identified in the heritage assessment for other assets apply equally here, undermining confidence in the adequacy of the heritage impact evaluation. Taken together, these points demonstrate an underassessment of the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby weakening the overall reliability of the environmental and heritage impact appraisal.

The applicant's own Coastal Character assessment recognises the Sound of Iona as an area of high sensitivity, directly facing the development site with extensive visibility. It identifies a large geographical extent of change, approximately 21 kilometres in range, where turbines span about 39 degrees of the horizon, resulting in a Moderate and Significant overall effect. Similarly, the West Coast of Iona is acknowledged as highly sensitive, with widespread visibility of the proposed development. The applicant accepts that residents and visitors across much of the island, including at its highest point, Dùn Ì, will experience significant visual effects. These findings underscore the substantial scale of visual impact on Iona, yet they appear to understate the full extent of the experience for the island's community and visitors.

Beyond visual considerations, the heritage implications are profound. Iona's monastic landscape, encompassing the Abbey, the Nunnery and the high crosses, is of international importance, with significance closely tied to pilgrimage, arrival by sea and movement through the landscape, as noted in the applicant's baseline studies. Historic Environment Scotland requested additional visual viewpoints, including from the ferry crossing, a key arrival experience, yet the applicant has not provided a visualisation from critical elevated locations such as the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn. Furthermore, community consultation reveals strong opposition, with 92 per cent of respondents objecting to the proposal. Despite the applicant's consultants identifying habitability as a potential pathway of effect for the island community, no assessment of this impact has been undertaken. The perceived scale of the turbines is further illustrated by comparison with Ben Hynish

on Tiree, a familiar landmark visible from Iona at 33 kilometres and 141 metres high; the largest turbines would exceed this height by approximately 194 metres while being located at roughly two-thirds of that distance. Taken together, these factors indicate that the applicant's assessment significantly underestimates the scale and significance of the visual, community and heritage effects on Iona, thereby compromising the accuracy of the environmental and social impact evaluation.

The applicant's assessment recognises that the Ross of Mull South coastal area is of High sensitivity at distances of approximately 22 to 24 kilometres and attributes a Medium magnitude of impact. It concedes significant effects at locations such as Erraid and on the Core Paths of the Ross of Mull. Furthermore, the applicant acknowledges that Fionnphort, serving as the gateway to Iona and the embarkation point for crossings, would experience a significant effect; this community is directly tied to the flow of visitors dependent on the visual and environmental quality of the area.

Across the wider island of Mull, the applicant also accepts significant effects on Core Paths and within Local Landscape Areas including Central, South, and West Mull. Notably, the Loch na Keal National Scenic Area, which encompasses Mull's western waters and islands and is assessed as having High sensitivity over distances of approximately 21 to 33 kilometres, is attributed no more than a Medium magnitude impact. This suggests a degree of inconsistency in the evaluation of the sensitivity and magnitude of effects within designated landscapes and raises questions about the thoroughness of the impact characterisation.

The approach taken in assessing the Wilderness and Gribun Rocks coastal area further exemplifies the limitations of the applicant's methodology. Despite the viewing distance exceeding 30 kilometres, the applicant judges the scale of change to be small, explicitly relying on distance-based reasoning. This overlooks the reliance of Mull's west-facing tourism economy, including wildlife boat operations and accommodation providers in western townships, on the integrity of the Atlantic seascape. These communities, which would face the industrialisation of a valued seascape, have not received the place-based assessment necessary to fully understand the economic and community impacts. Therefore, while the applicant's evidence acknowledges certain effects, the assessment falls short in comprehensively addressing the significant visual, economic, and community consequences for Mull and the Ross of Mull coastal communities and landscapes.

The applicant's assessment recognises effects on the Loch na Keal National Scenic Area, within which the island of Ulva is situated, acknowledging its designation and the shared landscape qualities at stake. Ulva is a community-owned island currently undergoing regeneration, characterised by a small, re-establishing population whose recovery depends fundamentally on the preservation of its unspoilt seascape and setting. However, no specific assessment has been undertaken regarding the impacts on Ulva's community or landscape qualities, representing a notable omission.

Similarly, the applicant addresses Staffa, also within the Loch na Keal National Scenic Area and located approximately 35 kilometres from the proposed development. Despite Staffa's status as one of the most celebrated small islands in

Europe and its acknowledged panoramic maritime qualities, the applicant concludes that effects at this distance would be small and not significant. This conclusion is drawn notwithstanding NatureScot's request to assess effects up to around 30 kilometres, implying that Staffa lies beyond the suggested assessment boundary, yet the importance of its seascape qualities may warrant closer consideration.

The Jura National Scenic Area, situated approximately 28 to 32 kilometres from the development, is described by the applicant as having high sensitivity. The magnitude of impact is assessed as medium to low, tempered by factors such as distance, scale, and retained landforms. Nonetheless, the designation of Jura hinges on its wild and undeveloped Atlantic character, which could be more vulnerable to change than the assessment suggests.

Lastly, the Scarba, Lunga, and the Garvellachs National Scenic Area, at distances between 35 and 40 kilometres, receive a similar treatment in the assessment, with no indication of significant effects.

In summary, while the applicant's assessment identifies potential effects on several designated landscapes, it appears to underestimate or omit detailed consideration of impacts on vulnerable island communities such as Ulva and significant seascape qualities of celebrated islands like Staffa. The reliance on distance thresholds and assumptions of limited magnitude may inadequately reflect the sensitivity and value of these areas, thereby undermining the protection of their natural and cultural attributes.

The applicant's assessment concludes a Low magnitude of change for the South Tiree coastal area despite recognising its High sensitivity at a distance of approximately 35 kilometres. This practical consequence is significant, as it directly informs the reliability of the overall evaluation of effects on Tiree's landscape. By attributing a Low magnitude of change, the assessment risks underrepresenting the actual scale of impact experienced by receptors on Tiree, which in turn undermines the credibility of any subsequent mitigation measures or planning decisions based on this evaluation.

Tiree's distinctive landscape character is fundamentally shaped by its exceptional low-lying topography and the dominance of sea and sky, with its highest elevation at Ben Hynish measuring a mere 141 metres. In this context, the introduction of turbines reaching up to 335 metres would present vertical elements unprecedented in the island's seascape. Given this stark contrast, the conclusion of a Low magnitude of change appears incongruous and insufficiently reflective of the visual and experiential effects on such a sensitive receptor. This suggests a severe understatement of impact that warrants reconsideration to ensure that the assessment accurately captures the scale and nature of landscape effects on Tiree.

The applicant's assessment fails to consider the significant effects on mainland and island communities that have direct views of the proposed development and rely economically on the seascape. This omission undermines the completeness of the evaluation and risks overlooking important social and economic impacts. For example, Gigha, a community-owned island celebrated nationally for its regeneration, faces the development waters from the east, yet no examination has

been made of how the project might affect its delicate community balance and local economy.

Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard which attract visitors throughout the peninsula. These seaward panoramas represent precisely the receptors that the applicant's distance-based visual impact mitigation approach fails to address adequately. The absence of specific assessment for this area is a notable gap given its established role in local tourism and community identity.

Furthermore, the chain of communities along the west coast of Kintyre, whose character and visitor economy are shaped by the open Atlantic seaboard facing Islay, Jura, and surrounding waters, have been similarly neglected. The same applies to the Treshnish Isles and other small islands and mainland coasts with views towards the development site. Together, these omissions indicate a systemic failure to evaluate effects on key receptors, thereby compromising the reliability of the applicant's overall assessment.

The applicant's environmental impact assessment applies a distance-based methodology that systematically moderates and discounts effects on sensitive receptors located beyond approximately 20 kilometres from the development site. This approach effectively reduces the assessed magnitude of change and diminishes the perceived significance of impacts at these greater distances. When compared to standard mitigation practices, which require thorough and place-specific evaluations regardless of distance, the applicant's methodology falls short by not adequately capturing or addressing the full extent of environmental consequences experienced by distant communities.

Taken together, the evidence demonstrates a clear and concerning pattern: wherever a highly sensitive receptor lies beyond the 20-kilometre threshold, the assessment attenuates the magnitude of impact without conducting a detailed, place-based analysis. Consequently, the communities residing in these areas receive no specific assessment of the effects they endure, undermining the integrity and comprehensiveness of the environmental impact assessment. This systematic discounting of significant effects beyond 20 kilometres fails to meet the necessary standards for a robust and equitable evaluation of environmental impacts.

1.1.224 Personal Observations

Based on my own local knowledge, I also wish to highlight that: All of these issues should be further examined - it would obviously impact them all negatively

Finally, I would also ask the Scottish Ministers to consider: Why should Scotland be used for foreign shareholders benefit?
This proposed wind farm would be a completely destructive environmental travesty and would destroy the seascape of one of the most beautiful parts of Scotland as well as Impacting the environment and ecosystem which cannot be replaced. Industrialising the inner Herbrides cannot be reversed and would be a sad reflection and irresponsility of the Scottish Government - it would demonstrate huge neglect on their part.

1.1.225 Further Comments

It is an outrageous idea to be inflicted on the landscape, seascape and environment for no obvious gain to Scotland - and there does not seem to be a mention of how the power will travel to where it is sold - are there to be pylons destroying the Scottish landscape too?
Please reject this proposal.

1.1.226 Summary

The proposal before the Scottish Ministers fails to satisfy the relevant statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges considerable impacts upon nationally designated landscapes, as well as on the heritage and communities along this coastal region. However, a closer scrutiny of the submitted documents reveals that these significant effects have been underestimated. Crucially, the necessary heritage assessment has not been undertaken, and although impacts on the island communities have been identified, they remain unassessed. Furthermore, it has not been demonstrated that the ecological safeguards mandated by law can be complied with. Compounding these concerns, only a portion of the entire project is subject to the Ministers' consideration at this stage.

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

Should the Ministers consider not to refuse outright, it is requested that they require the submission of additional environmental information alongside enhanced visual representations of the development. Furthermore, it is proposed that the applications be determined only following a public inquiry, thereby allowing all objections and issues raised to be fully and properly examined. Regardless of the final decision, it is also sought that the Ministers clearly articulate their conclusions regarding the effects on cultural heritage and the impacted island communities within their formal reasons.

Yours faithfully,

[Redacted]

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

Member of the public 525
Dear Sir/Madam,

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

It is requested that this correspondence be registered as a formal objection, that I be recorded as an objector, and that I receive notification of the final determinations concerning these applications.

The grounds for objection presented here are founded upon planning and environmental considerations, evaluated within the statutory and policy frameworks governing the determination of these proposals. It is fundamental to note that the onus of proof lies with the applicant, who must provide adequate and compelling evidence to satisfy all relevant tests. Objectors are not required to establish contrary evidence. In this case, the applicant has failed to meet this evidential burden. Consequently, for the detailed reasons outlined below, it is submitted that consent should be withheld.

1.1.227 Legislative and Policy Framework

The marine licence application submitted under Part 4 of the Marine (Scotland) Act 2010 fails to demonstrate compliance with the statutory requirements and the relevant policies set out in Scotland’s National Marine Plan. The application does not adequately address the General Policies critical to the assessment, including GEN 4 on Co-existence, GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 and paragraph 4.85 on Cumulative Impacts. The absence of clear evidence demonstrating conformity with these policies constitutes a fundamental deficiency in the application’s statutory assessment.

Given that compliance with the National Marine Plan policies is a mandatory part of the authorisation decision under the Marine (Scotland) Act 2010, the failure to provide sufficient evidence or to resolve identified omissions and conflicts with the legal and policy framework weighs decisively against the granting of consent. The application’s shortcomings in meeting the required standards of evidence and policy adherence undermine the statutory determination process and render the proposal incompatible with the established marine planning regime. Consequently, the marine

licence application should be refused on the grounds of non-compliance with the Marine (Scotland) Act 2010 and the National Marine Plan.

The proposal fails to provide an adequate Environmental Impact Assessment (EIA) and Habitats Regulations Assessment (HRA) as required by law. Under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, it is mandatory that the likely significant environmental effects of the proposal be identified, assessed, and reported prior to any determination. Furthermore, the Habitats Regulations mandate that the effects of the proposal on European protected sites must be assessed in accordance with the applicable statutory tests. The evidence before the determining authority does not demonstrate compliance with these legal requirements and reveals deficiencies and omissions in the assessments submitted. Such failures constitute a direct conflict with the applicable legal and policy framework and, accordingly, weigh decisively against the granting of consent for this proposal.

1.1.228 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to comply with the impact criteria set out in NPF4 Policy 11, resulting in significant adverse effects on nationally designated landscapes and seascapes. In particular, it does not demonstrate adequate protection of the cultural significance of scheduled monuments and their settings, nor does it show that island communities would be safeguarded. Furthermore, the ecological assessments required by the policy have not been sufficiently evidenced as capable of being met. Given that NPF4 Policy 11's support for renewable energy development is conditional upon satisfying its impact criteria—specifically those concerning communities (Policy 11(c)) and landscape, seascape, and other receptors (Policies 11(d) and 11(e))—the proposal's shortcomings undermine its compliance and therefore its policy support.

The proposal would result in significant adverse consequences for a range of nationally important assets, undermining the protections established by multiple relevant policies within the National Planning Framework 4 (NPF4). Most notably, it would detract from the qualities for which designated National Scenic Areas and other nationally important landscapes have been recognised, contrary to the safeguards set out in Policy 11 alongside Policies 4(c) and 4(d). These policies explicitly aim to prevent significant harm to the defining characteristics of these landscapes, yet the evidence clearly indicates that the proposal fails to meet this essential requirement.

Furthermore, the proposal does not demonstrate adequate protection for the cultural significance of scheduled monuments or their settings, as required by Policy 7 and its sub-parts 7(h), 7(c), and 7(d). The absence of compelling evidence to safeguard these historic assets points to a clear conflict with these provisions. In addition, the proposal falls short of assuring the protection of island communities, and critically, the ecological criteria mandated under Policy 3 on biodiversity have not been convincingly addressed on the submitted evidence. Taken together, these factors confirm that the proposal is in conflict with multiple NPF4 policies designed to preserve nationally designated landscapes, heritage assets, and biodiversity.

The applicant's evidence acknowledges that, in so far as the terrestrial development plan is material to the effects experienced on land, including the Argyll and Bute Local Development Plan 2, the proposed development would result in adverse impacts. Specifically, the proposal would detrimentally affect the landscape character, heritage assets, and community interests that the relevant policies within the Local Development Plan seek to protect. These elements are integral to the local planning framework's objectives for sustainable and sensitive land use, and the proposal's failure to avoid harm in these respects is a significant point of concern.

Consequently, this adverse impact establishes a clear conflict between the proposal and the development plan framework, as well as with the National Planning Framework 4 when considered in its entirety. The applicant has not provided sufficient evidence to demonstrate that these conflicts can be overcome or justified. As such, the proposal stands contrary to the established policy framework designed to safeguard the terrestrial environment and community well-being within Argyll and Bute, reinforcing the case for its refusal on planning grounds.

1.1.229 Seascape, Landscape and Visual Effects

While the applicant acknowledges certain effects on landscape and seascape interests, it has failed to demonstrate that these effects have been adequately mitigated in accordance with relevant policy requirements. Specifically, these effects engage National Planning Framework 4 (NPF4) Policies 4(c) and 4(d), 11(d) and 11(e), alongside Policy GEN 7 and paragraph 4.28 of the National Marine Plan. Despite this, the applicant has not shown that its conclusions regarding the scale of these accepted effects align with its own stated methodology. Consequently, compliance with policies designed to protect nationally important landscapes and seascapes remains unproven, undermining the proposal's conformity with the established planning framework.

1.1.230 Cultural Landscape, Archaeology and Historic Environment

The application fails to comply with essential policy requirements for the protection of heritage assets, rendering it unacceptable in its current form. Specifically, it engages National Planning Framework 4 (NPF4) Policy 7(h), which pertains to scheduled monuments, as well as Policies 7(c) and 7(d) concerning their settings, alongside GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Despite these clear policy obligations, the applicant has not demonstrated that the cultural significance of internationally and nationally important heritage assets and their settings will be safeguarded. Furthermore, the Scottish Ministers have not been provided with the necessary assessments to substantiate such a conclusion. In the absence of this critical evidence, the proposal cannot be deemed compliant with heritage protection policies and should therefore be refused.

1.1.231 Effects on Island Communities, Tourism and the Local Economy

The applicant's own baseline assessments acknowledge that the island communities affected by the proposed development rely heavily on visitors who are drawn specifically by the distinctive qualities of the area. These include the landscape, seascape, cultural heritage, tranquillity and remoteness. Such attributes are

fundamental to the visitor appeal and, by extension, the economic foundation of these island communities.

Any alteration to these intrinsic qualities directly undermines the economic base upon which these communities depend. This, in turn, jeopardises the provision of local services, threatens population retention, and ultimately compromises the long-term viability and sustainability of the island settlements. The proposal, therefore, poses a significant risk to the fundamental economic and social sustainability of these island communities.

While the applicant's assessment methodology addresses potential impacts on port communities with detailed analysis, it notably lacks an equivalent, place-based evaluation of the island communities directly facing the development. The applicant's own consultants acknowledged habitability as a potentially significant pathway affecting these island communities; however, no specific assessment of island habitability was conducted. Instead, the socio-economic assessment in Chapter 18 operates at a broad regional level and concludes that island communities exhibit low sensitivity to tourism effects. This approach is fundamentally flawed because small island economies cannot be accurately represented by regional averages. Their economies are concentrated in sectors highly vulnerable to changes in the attributes that attract visitors, and an increasing reliance on visitor numbers exacerbates their sensitivity rather than diminishes it. Therefore, the conclusion of low sensitivity, derived without any place-based analysis, constitutes an unsupported assumption rather than evidence. Consequently, the applicant's socio-economic assessment is inadequate to understand or mitigate the true impacts on island communities.

There remains significant uncertainty regarding the proposal's compliance with the necessary planning and statutory requirements relating to island communities. The relevant policy framework, including GEN 19 and paragraph 4.81 of the National Marine Plan, mandates that decisions must be founded on robust socio-economic evidence and adopt a precautionary approach where such evidence is insufficient. Additionally, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 impose a clear duty to assess and give weight to the interests of island communities through meaningful engagement throughout the decision-making process. This proposal falls short of these standards.

The applicant has acknowledged that island communities warrant particular scrutiny but has failed to undertake the comprehensive assessment required to understand fully the proposal's effects upon these communities. Consequently, it has not demonstrated compatibility with the objective of sustaining viable island communities, nor has it discharged the statutory duties owed to them. In light of these deficiencies, the proposal cannot be considered compliant with the established policy and statutory framework protecting island communities.

1.1.232 Ecology, Biodiversity and Habitats Regulations

There remains considerable uncertainty regarding the full extent of ecological impacts arising from the proposed development within this sensitive marine environment. The area in question encompasses Priority Marine Features and Annex I habitats, which are recognised for their ecological importance. Moreover, the

surrounding waters provide habitat for a range of protected species including seabirds, marine mammals and basking sharks.

The scale of the proposal is significant, with construction, operation and eventual decommissioning activities projected to take place over several decades. Introducing such sustained and large-scale human activity into an environment of high ecological sensitivity raises concerns about potential adverse effects, which have yet to be satisfactorily addressed. The cumulative and long-term consequences on the integrity of the Priority Marine Features and associated species warrant thorough scrutiny.

Given the recognised environmental value of the site and the scale of the proposed works, careful consideration must be given to the potential for significant harm. It is essential that any planning decision fully accounts for the ecological sensitivities and ensures that adequate measures are in place to avoid or mitigate adverse impacts throughout the lifetime of the development.

The applicant has provided a Without Prejudice Derogation Case along with a Without Prejudice Guillemot Compensation Plan specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are typically prepared to address situations where an adverse effect on the integrity of a protected site cannot be ruled out. Their inclusion in the application signifies a recognition by the applicant of the potential for such impacts.

Importantly, the submission of these documents indicates that the applicant acknowledges the possibility that Scottish Ministers may reach a different conclusion regarding adverse effects on the protected site. This underscores the precautionary approach taken and the intent to comply with the necessary derogation provisions, should they be required, to mitigate any identified harm to the guillemot population.

Under the Habitats Regulations, consent for developments affecting protected habitats and species may only be granted where the competent authority has ascertained that the proposal will not adversely affect the integrity of the protected site, unless the stringent derogation tests are satisfied. This requirement demands that no reasonable scientific doubt remains regarding the absence of such adverse effects. The onus of proof lies squarely with the applicant, who must provide robust evidence to meet this high evidential standard. Importantly, proposals for mitigation, compensation, or future monitoring alone cannot substantiate compliance with the statutory tests, underscoring the necessity for conclusive scientific certainty before consent can lawfully be given.

These legal obligations engage not only the Habitats Regulations but also specific policies within the National Marine Plan, notably GEN 9 and GEN 13, as well as Policies 3, 4(b), 4(e), and 4(f) of NPF4. This comprehensive policy framework reinforces the critical importance of safeguarding protected sites and species through rigorous assessment processes. Any development proposal must therefore demonstrate unequivocally that it will not compromise protected site integrity in order to secure consent, reflecting the stringent protections embedded within both statutory and planning policy regimes.

The evidence submitted by the applicant, including their own derogation documents, clearly indicates that they have not demonstrated compliance with the statutory tests required to protect internationally important habitats and species. This fundamental shortfall calls into question the validity of the application in its current form. Without satisfying these legal requirements, the protection of these critical ecological features cannot be assured.

Moreover, the degree of certainty necessary to ensure that adverse impacts will be avoided or mitigated has not been established. The statutory tests exist precisely to safeguard internationally important ecological assets, and failure to meet them undermines the integrity of the planning process. It is imperative that any proposal affecting such features demonstrates unequivocal compliance before consent is considered.

In light of these findings, it is clear that the application does not meet the legal thresholds set to protect internationally important ecological interests. Consequently, the case for granting planning consent is fundamentally undermined, and the application should not be approved.

1.1.233 Cumulative and In-Combination Effects

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

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

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

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

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

1.1.234 Public Engagement, Site Selection and Environmental Information

The applicant urges Scottish Ministers to accord significant weight to the site-selection process, thereby making the quality of public participation within that process a matter of direct relevance. However, there have been notable deficiencies in public engagement not only during the plan and site-selection stages but persisting into the current application phase. The application itself comprises several thousand pages of highly technical documentation. Compounding this complexity, the consultation period has coincided with the busiest months of the year for island communities, a time when local residents are heavily engaged in continuous work throughout the visitor season. This period also represents when access to specialist advice is at its lowest, placing an additional burden on those seeking to engage meaningfully. In contrast, the applicant has had years to prepare, backed by substantial professional and financial resources, highlighting a significant imbalance in the ability to participate effectively.

The National Marine Plan's policy GEN 18, alongside the principles of effective public participation enshrined in the Aarhus Convention, mandates that those affected by decisions of this magnitude must be afforded a realistic opportunity to engage. Unfortunately, the conditions under which the affected communities have had to respond fall well short of these established standards. This deficiency undermines the legitimacy of the consultation process and, by extension, the robustness of the site-selection exercise that the applicant wishes to emphasise. It is therefore imperative that Ministers take these shortcomings into careful consideration when evaluating the representations submitted, recognising the serious implications for the fairness and inclusivity of the decision-making process.

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

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

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

1.1.235 Effects on Local Area

The applicant's assessment significantly underestimates the direct and substantial effects of the proposed development on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby undermining the reliability of the environmental and heritage impact evaluation. Although Islay and Colonsay are the closest islands to the development area, which lies immediately north-west of Islay and west of Colonsay, the application primarily considers Islay only as a potential project location. It fails to evaluate Islay as an affected island community in its own right, neglecting a place-based assessment of the impacts on its Atlantic-facing communities, which directly face the nearest edge of the 448 square kilometre development area. This omission disregards potential effects on the islands' setting, economy, and community life.

For Colonsay and Oronsay, the seaward outlook—integral to daily life—faces the development array directly. Notably, the North Colonsay and Western Cliffs Special Protection Area, which forms part of Colonsay's coastline, is central to the applicant's derogation case and compensation plan. This area is the clearest acknowledgment within the application that harm to the internationally protected seabird population of these cliffs cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance situated within this community's area, is subject to the same deficiencies identified in the heritage assessment, particularly concerning the treatment of its open maritime setting. Taken together, these points demonstrate that the applicant's evaluation lacks the necessary rigour and comprehensiveness to fully capture the scale and nature of effects on these vulnerable island communities and their heritage assets.

The applicant's Coastal Character assessment recognises the Sound of Iona as an area of High sensitivity with direct orientation towards the development, extensive visibility, and a large geographical extent of change. This assessment notes effects on the ferry crossing between Fionnphort and Iona, concluding an overall effect that is Moderate and Significant across approximately 21 kilometres, with turbines extending over about 39 degrees of the horizon. Similarly, the West Coast of Iona is identified as highly sensitive with widespread visibility, and the applicant acknowledges significant effects on residents and visitors across much of the island, including at Dùn Ì, Iona's highest point. Despite this, the scale and significance of these visual impacts appear to be understated in the applicant's evaluation, particularly when considering familiar visual references. For instance, Ben Hynish on Tiree, which is 141 metres high and visible from Iona at around 33 kilometres, would be overtopped by the largest turbines by approximately 194 metres at roughly two-thirds of that distance, indicating a far greater perceived scale than conveyed by the applicant.

Beyond visual effects, the applicant's assessment inadequately addresses the profound heritage and community impacts on Iona. The island's monastic landscape, including the Abbey, the Nunnery, and the high crosses, is of international importance, with significance intrinsically linked to pilgrimage, arrival by sea, and

movement through the landscape, as acknowledged in the applicant's baseline studies. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet no visualisation is provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, a notable omission given the heritage context. Furthermore, a household consultation on Iona revealed that 92 per cent of respondents object to the proposal, yet the applicant's own consultants identified habitability as a pathway of potential effect on this community, which was never formally assessed. Taken together, these omissions and underestimations compromise the accuracy and completeness of the environmental and social impact evaluation regarding Iona, warranting a more robust and comprehensive assessment of the significant effects on this sensitive and internationally important island.

The applicant's assessment acknowledges significant effects on several key areas of Mull and Ross of Mull, including the Ross of Mull South coastal area, which is identified as having High sensitivity at distances of approximately 22 to 24 kilometres and is attributed a Medium magnitude of impact. Notably, significant effects are accepted at Erraid and on the Core Paths of the Ross, as well as at Fionnphort—the critical gateway to Iona and the embarkation point for visitors—where the community's experience is recognised as being significantly affected due to its direct connection to visitor flows.

Across Mull more broadly, the applicant concedes significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Areas. The Loch na Keal National Scenic Area, encompassing the western waters and islands of Mull, is assessed as having High sensitivity throughout a range of approximately 21 to 33 kilometres, yet the magnitude of impact attributed does not exceed Medium. This raises concerns regarding the adequacy of the assessment in capturing the true extent of effects within these designated landscapes.

Further, the approach taken to areas such as the Wilderness and Gribun Rocks coastal area—where the applicant reasons that the scale of change is small due to viewing distances exceeding 30 kilometres—exemplifies a reliance on distance-based criteria that may understate potential impacts. Crucially, the west-facing tourism economy of Mull, along with its wildlife boat operations and accommodation in western townships, depend heavily on the Atlantic seascape, which the proposed development would industrialise. Despite this, none of these communities have been the subject of a place-based assessment, leaving a significant gap in understanding and addressing the localised economic and community effects.

The applicant's assessment recognises certain effects on designated landscapes within the Loch na Keal National Scenic Area, including Ulva and Staffa, but this evaluation appears to underestimate or omit significant impacts on these and other important seaboard areas. Ulva, a community-owned island undergoing regeneration, is noted as sharing fully in the effects on the National Scenic Area. This island supports a small, re-establishing community whose recovery is intrinsically linked to the unspoilt seascape and setting that the development threatens. Despite this, no specific assessment of impacts on Ulva's natural and cultural qualities has been undertaken. Similarly, Staffa, located approximately 35 kilometres from the development site and beyond the 30-kilometre assessment boundary advised by NatureScot, is described by the applicant as experiencing only

small-scale change with no significant effect. This conclusion is drawn notwithstanding the applicant's own recognition of Staffa's panoramic maritime qualities and its status as one of Europe's most celebrated small islands.

Beyond Loch na Keal, the applicant's approach to other National Scenic Areas also raises concerns regarding the adequacy of impact assessment. The Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed as having High sensitivity at a distance of 28 to 32 kilometres from the development but assigned a Medium to Low magnitude of change. This lower magnitude is justified primarily by distance and retained landforms, yet it appears to underplay the significance of Jura's defining character. Similarly, the Scarba, Lunga and the Garvellachs National Scenic Area, situated approximately 35 to 40 kilometres away, receives an equivalent treatment without detailed consideration of the potential effects on its natural qualities. Collectively, these assessments suggest an underestimation of the wider seaboard landscape and island community impacts, thereby undermining the protection of their valued natural and cultural characteristics as established in relevant planning policies.

The practical consequence of the applicant's assessment is a significant understatement of the impact on Tiree's landscape character, which undermines the reliability of the overall evaluation. The South Tiree coastal area has been assessed as having a High sensitivity at a distance of approximately 35 kilometres, yet it is attributed only a Low magnitude of change. This inconsistency raises concerns because such a Low magnitude does not align with the sensitivity rating assigned, suggesting that the effects on this receptor have not been fully or accurately accounted for.

Tiree's landscape is exceptionally distinctive, characterised by its low-lying nature and the overwhelming presence of sea and sky. The highest point on the island, Ben Hynish, reaches only 141 metres, emphasising the flat and open nature of the terrain. Introducing turbines up to 335 metres in height represents an unprecedented vertical intrusion into this seascape, which is defined by uninterrupted oceanic horizons. Given this context, the conclusion of a Low magnitude of change for such a sensitive and exposed receptor is clearly an understatement. This misjudgement leads to an unreliable assessment of the effects on Tiree's sensitive landscape character, which should be recognised and addressed in the planning evaluation.

The applicant's assessment fails to consider significant effects on mainland and island communities that have direct visual and economic connections to the seascape impacted by the proposed development. This omission undermines the comprehensiveness of the environmental appraisal and risks overlooking adverse consequences for populations reliant on the coastal environment.

Gigha, a community-owned island celebrated nationally for its regeneration, faces the development site from the east. The finely balanced community and its economy, which depend substantially on the surrounding waters, have not been examined within the assessment. Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the

receptors affected by the distance-based moderation approach contested in this representation.

Furthermore, the chain of communities along the west coast of Kintyre, whose character and visitor economy are defined by the open Atlantic seaboard views towards Islay, Jura, and adjacent waters, share comparable exposure. The Treshnish Isles and other small islands and mainland coasts with outlooks toward the development area are equally disregarded. Such omissions from the assessment leave a critical gap in understanding the full scope of the development's effects and should be addressed to ensure a robust and inclusive evaluation.

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

1.1.236 Personal Observations

In addition to the planning matters above, I am personally concerned because: Our energy prices will go up not down to pay these companies to turn off. It's a green wash nonsense to make millions and does nothing for the environment apart from decimate its wildlife and beauty. What a dreadful idea. What government would allow a foreign country to destroy its own in the name of clean energy. I'm sure Spain has offshore environments of its own to ruin.

Based on my own local knowledge, I also wish to highlight that: Scotland is one of the most beautiful countries in the world, tourism is our biggest asset why destroy the landscape for no reason.

Finally, I would also ask the Scottish Ministers to consider: This is not industry, it's self harm. Even considering these proposals is treachery to the Scottish peoplle.

1.1.237 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy requirements governing its determination. The applicant's own assessment acknowledges considerable impacts on nationally designated landscapes, as well as on the coastal communities and their heritage. Furthermore, published evaluations of the applicant's documentation reveal that the extent of

these impacts has been underestimated and that a comprehensive heritage assessment has not been conducted. Although the effects on the island communities involved were identified, no formal assessment of these impacts has been undertaken. In addition, the ecological criteria necessary for approval have not been demonstrated as achievable. It is also pertinent to note that only a portion of the project is currently submitted to the Scottish Ministers for consideration.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to decline the related marine licence application.

Should the Ministers be inclined to grant consent, I request that they require the submission of further environmental information and enhanced visualisations. I also propose that the determination of the applications be deferred until after a public inquiry, thereby allowing a thorough examination of the issues raised in this objection. Regardless of the decision reached, I ask the Ministers to provide clear and explicit conclusions concerning the impacts on cultural heritage and on the affected island communities within their stated reasons.

Yours faithfully,

[Redacted]

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

Member of the public 526
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, detailed in application 00012385 seeking consent under section 36 of the Electricity Act 1989, and application 00012386 requesting a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These submissions, made by MachairWind Limited (ScottishPower Renewables), relate to a project involving approximately 2 gigawatts of installed capacity. The development envisions between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip, situated within a designated Windfarm Development Area spanning roughly 448 square kilometres of marine environment north-west of Islay and west of Colonsay. The site lies about 21 kilometres from Iona and in close proximity to various islands and coastal communities of the southern Hebrides.

I request that this correspondence be officially recognised as an objection, that I be recorded as an objector, and that I receive notification upon determination of these applications.

The grounds of my objection are anchored in planning and environmental considerations, assessed within the relevant statutory and policy context governing these applications. It is imperative to acknowledge that the evidential responsibility lies entirely with the applicant to substantiate that all applicable legal and policy criteria are met. Objectors bear no obligation to prove the contrary. Upon examination of the submissions and accompanying evidence, it is clear that MachairWind Limited has failed to satisfy this burden. Consequently, the applications should be refused consent on the basis outlined herein.

1.1.238 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to comply with multiple policies within the National Planning Framework 4 (NPF4) that safeguard nationally important landscapes, heritage assets, and biodiversity. As set out in Policy 11, alongside Policies 4(c) and 4(d), there is a clear requirement to protect National Scenic Areas and nationally important landscapes from significant adverse effects on the qualities for which they are designated. Additionally, Policy 7—including Policy 7(h) concerning scheduled monuments and Policies 7(c) and 7(d) regarding the settings of historic assets—establishes a duty to preserve the cultural significance of such sites. Policy 3 further imposes rigorous tests to ensure biodiversity is maintained and enhanced.

In this case, the proposal would cause significant adverse effects on nationally designated landscapes and seascapes, undermining the fundamental purpose of these designations. Furthermore, the applicant has not demonstrated that the cultural significance of scheduled monuments and their settings would be adequately protected, nor has it been established that island communities, which are intrinsically linked to these heritage assets, would be safeguarded. Finally, the ecological assessments and tests required under Policy 3 have not been shown to be capable of being met on the evidence submitted. This cumulative failure to satisfy the interrelated policies protecting designated assets constitutes a clear conflict with NPF4 and weighs strongly against the proposal’s acceptability.

1.1.239 Seascape, Landscape and Visual Effects

The applicant's written methodology, as set out in Appendix 16.1, does not specify any distance threshold beyond which major effects are deemed to cease. Nevertheless, an independently prepared Evidence Note, relying entirely on the applicant's Chapter 16 and Appendices 16.1 to 16.3, identifies a clear and consistent pattern across all three assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of its sensitivity or the extent of visibility. This finding is corroborated by the applicant's own documentation, which explicitly acknowledges the influence of distance on judgements of effect magnitude. For example, the assessment of a coastal area situated over 30 kilometres away concludes that, due to the viewing distance, the scale of change is small. Furthermore, the Landscape Character synthesis categorises magnitude as High within roughly 20 kilometres, Medium between about 20 and 30 kilometres, and Low beyond approximately 30 kilometres for certain landscape types. The practical consequence of this approach is that protective assessments rely on systematically moderated magnitude inputs at distances where some of the most sensitive designated landscapes are situated. As a result, the conclusions drawn from these assessments do not reliably represent the true effects that Scottish Ministers are being asked to consider and consent to.

1.1.240 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment adopts Historic Environment Scotland's recognised methodology for evaluating effects on the setting of historic assets, which requires an appraisal of whether changes affect the contribution that setting makes to cultural significance and whether the integrity of that setting is adequately retained. This methodology explicitly states that visual change should not be directly equated with adverse impact. However, a published Methodological Audit, prepared in support of community objections and relying entirely on the applicant's Appendix 14.3, finds that while the assessment identifies relevant heritage attributes, it fails to demonstrate how the integrity of setting has been evaluated in accordance with the accepted methodology. Instead, the assessment focuses on describing visual changes—considering factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—and then concludes that the integrity of setting is adequately retained without showing the necessary evaluative step required by the methodology. This omission undermines the reliability of the applicant's conclusions about heritage impacts.

The practical consequence of the applicant's assessment is that it risks underrepresenting the full cultural significance of the heritage assets affected. The applicant's own baseline acknowledges that this significance arises not only from isolated monuments but from experiential qualities such as pilgrimage routes, arrival by sea, and movement through a living cultural landscape. These qualities encompass the relationships between monuments, spirituality, and the surrounding landscape and seascape, which are appreciated through dynamic movement rather than static viewpoints. Historic Environment Scotland's consultation responses, as recorded in the application, further highlight this concern by requesting additional viewpoints to ensure that these broader cultural and experiential qualities are

adequately represented. Without addressing these wider aspects, the assessment may fail to capture the heritage assets' true baseline qualities, leading to an incomplete understanding of potential impacts.

The practical consequence of the deficiencies identified in the landscape assessment is that the heritage impact conclusions derived from it cannot be regarded as reliable. Where the landscape effects have been understated, as previously detailed, any conclusions about heritage impacts that rely on this assessment inevitably reflect the same understatement. This dependency undermines the credibility of the heritage evaluation and raises serious concerns about the robustness of the overall appraisal.

It is essential to recognise that the heritage conclusions are not independent but are intrinsically linked to the landscape assessment. As the evidence from source S01 makes clear, the heritage conclusions “depend upon the landscape assessment,” meaning that any errors or omissions in the latter directly influence the former. Therefore, if the landscape assessment fails to accurately capture the extent or significance of landscape effects, the heritage conclusions built upon it must be regarded as compromised.

In light of this interdependency, the planning process must take account of the potential underestimation of landscape effects and the consequent impact on heritage conclusions. Without a thorough and accurate landscape assessment, the heritage impact appraisal lacks a sound evidential basis, which could lead to inappropriate decision-making. It is thus imperative that the landscape assessment is revisited and rectified to ensure that heritage impacts are properly understood and addressed in the planning determination.

The application fails to demonstrate compliance with key policy requirements designed to safeguard heritage assets of international and national importance, notably those protected under NPF4 Policy 7(h) concerning scheduled monuments and Policies 7(c) and 7(d) related to their setting. This shortfall is significant given the statutory weight these provisions carry in the planning framework. Additionally, the application does not adequately engage with GEN 6 or the guidance set out in paragraphs 4.22 to 4.23 of the National Marine Plan, both of which reinforce the imperative for rigorous heritage protection.

Critically, the applicant has not provided sufficient evidence to show that the cultural significance of these heritage assets and their settings will be preserved. The absence of a robust assessment undermines the confidence that the proposed development would not result in harm to assets of such high heritage value. Without this essential analysis, Scottish Ministers cannot be satisfied that the statutory duties relating to heritage protection have been fulfilled, thereby compromising the application’s acceptability in principle.

In light of these deficiencies, it is clear that the proposal does not meet the necessary standards for the protection of heritage assets as mandated by current planning policy. This failure to adequately assess and mitigate potential impacts on culturally significant sites fundamentally undermines the application’s compliance

and warrants refusal. Consequently, the application should not be granted planning permission.

1.1.241 Effects on Island Communities, Tourism and the Local Economy

The proposed development poses a significant threat to the fundamental economic and social sustainability of the island communities concerned. These communities rely exceptionally heavily on visitors, who are attracted precisely by the qualities identified in the applicant's own baseline assessments: the landscape, seascape, cultural heritage, tranquillity and remoteness. Any alteration to these defining attributes would directly undermine the economic foundation upon which these communities depend.

Such an impact would extend beyond mere economics, affecting local services, population stability and the overall viability of the island settlements. The interdependence between the visitor experience and community sustainability is clear, and therefore the proposal's effect on the qualities that draw visitors must be considered with the utmost seriousness.

The practical consequence of the applicant's inadequate assessment methodology is a significant risk that the specific impacts on island communities will be neither properly understood nor effectively mitigated. Although the applicant's own consultants identified habitability as a potentially significant pathway through which the proposal could affect these communities, no subsequent assessment of habitability was undertaken for the affected islands. Instead, the socio-economic assessment presented in Chapter 18 focuses primarily on regional analysis, providing detailed consideration of potential port communities but failing to undertake an equivalent place-based assessment of the island communities directly facing the development. Despite this omission, the assessment nonetheless concludes that these island communities exhibit low sensitivity to tourism effects, a finding that lacks empirical grounding.

This conclusion overlooks the distinctive economic characteristics of small island communities, which cannot be accurately represented by regional averages. Island economies tend to be heavily concentrated in sectors that are particularly vulnerable to changes in the qualities that attract visitors. Rather than reducing sensitivity, a dependence on increasing visitor numbers heightens the community's vulnerability by deepening reliance on those qualities at risk. Without a place-based analysis, the claim of low sensitivity is not supported by evidence but instead rests on an unsubstantiated assumption. This methodological flaw undermines confidence in the assessment's findings and calls into question the adequacy of any proposed measures to address potential adverse socio-economic impacts on island communities.

The proposal fails to comply with the relevant policy and statutory duties concerning island communities. Specifically, it does not satisfy the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions be grounded in robust socio-economic evidence and adopt a precautionary approach where such evidence is insufficient. Furthermore, it conflicts with NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, both of which impose a duty to assess and give

due weight to the interests of island communities through meaningful engagement from the earliest stages of the proposal to its conclusion. Although the applicant acknowledged the need for particular scrutiny of island communities, no adequate assessment has been undertaken to understand the potential impacts on them. Consequently, it remains unproven that the proposal aligns with the principles of sustaining island communities, and the statutory responsibilities owed to these communities have not been fulfilled. Therefore, the proposal cannot be regarded as compliant with the necessary planning and statutory standards for the protection and support of island communities.

1.1.242 Ecology, Biodiversity and Habitats Regulations

The proposed development presents a significant risk of adverse environmental effects due to its location within an ecologically sensitive area. Priority Marine Features and Annex I habitats are present within the development site itself, indicating a high level of ecological importance. Furthermore, the surrounding waters provide habitat for protected species, including seabirds, marine mammals, and basking sharks. The scale and duration of the proposed construction, operational, and decommissioning activities—extending over several decades—would exert considerable pressure on these vulnerable ecosystems. Given the presence of such valuable marine biodiversity and the potential for substantial disturbance, the development is likely to result in significant environmental harm. It is therefore imperative that this ecological sensitivity is fully recognised and appropriately addressed in any planning decisions.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are typically prepared in circumstances where an adverse effect on the integrity of a protected site cannot be definitively ruled out. Their inclusion in the application package signals a recognition by the applicant of potential environmental impacts that may arise, necessitating mitigation and compensation measures to address any harm caused.

This approach implicitly acknowledges that the applicant’s own assessment does not preclude the possibility that Scottish Ministers might reach a different conclusion regarding adverse effects on the protected site. Therefore, the submission of these documents serves not only as a demonstration of intent to manage and compensate for potential impacts but also as a procedural safeguard within the derogation framework. It reflects the applicant’s awareness of the sensitivity of the site and the need to provide robust evidence to support any necessary derogation from conservation objectives.

While mitigation, compensation proposals, and future monitoring are often presented as means to address potential impacts on protected habitats and species, they do not, in isolation, satisfy the stringent legal requirements set out under the Habitats Regulations. Consent may only be granted if the competent authority is satisfied beyond reasonable scientific doubt that the integrity of the protected site will not be adversely affected. This high evidential standard places the onus firmly on the applicant to demonstrate compliance. The statutory tests are unequivocal, and

reliance on proposed mitigation measures cannot substitute for clear evidence that the development will cause no harm. This legal framework is further reinforced by relevant provisions within the Habitats Regulations, GEN 9 and GEN 13 of the National Marine Plan, and Policies 3, 4(b), 4(e), and 4(f) of NPF4. Consequently, any planning consent must be predicated on definitive assurances rather than assumptions of future mitigation efficacy.

The assessment of the submitted evidence, notably the applicant's own derogation documentation, reveals a fundamental failure to satisfy the statutory tests designed to protect internationally important habitats and species. This lack of demonstrable compliance undermines the legal safeguards intended to prevent harm to these ecological features. Consequently, the application does not meet the required legal standards, thereby weakening the justification for granting consent.

1.1.243 Cumulative and In-Combination Effects

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

The cumulative impact assessment is fundamentally compromised by its reliance on baseline evaluations that understate the true effects of the proposed development. This flaw becomes evident when considering that the cumulative assessments are contingent upon the findings of the Environmental Impact Assessment's individual components. Specifically, where the initial landscape, heritage, and socio-economic assessments minimize the extent of adverse effects, the cumulative analysis is predicated on this diminished baseline. Consequently, the aggregation of impacts from this proposal alongside other existing, consented, and foreseeable developments is similarly underestimated. This methodological weakness undermines the reliability of the cumulative impact conclusions and suggests that the combined effects are more significant than reported. It is therefore essential that the baseline assessments be revisited to ensure an accurate and robust cumulative evaluation.

The applicant's submission fails to adequately address the requirements set out in GEN 21 and paragraph 4.85 of the National Marine Plan, as well as Policy 11(e) of the National Planning Framework 4 (NPF4), alongside the Environmental Impact Assessment (EIA) Regulations concerning project splitting. Specifically, there is an absence of a reliable identification and assessment of the cumulative and in-

combination effects of the proposal. This deficiency undermines the holistic understanding of the project's overall environmental impact, as the effects of the project as a whole have not been comprehensively evaluated.

Given this shortcoming, it is imperative that the decision-making process explicitly considers the treatment of deferred works. Without such consideration, the planning authority cannot ensure full compliance with the aforementioned policies and regulatory frameworks. Therefore, it is requested that the deferred elements of the project be expressly addressed in the determination to secure a thorough and legally compliant assessment of all potential environmental effects.

1.1.244 Public Engagement, Site Selection and Environmental Information

The applicant emphasises that the weight the Scottish Ministers are asked to place on the site-selection process renders the quality of public participation in that process directly material. However, significant deficiencies in participation during both the plan and site-selection stages have persisted into the application stage. The application itself comprises many thousands of pages of technical material, yet the consultation period occurred during the busiest months for island communities, when residents are engaged continuously throughout the visitor season and access to specialist advice is limited. In contrast, the applicant has had years and substantial professional and financial resources to prepare its case. Furthermore, GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, require that those affected have a realistic opportunity to engage with decisions of this magnitude. The conditions imposed on the affected communities fall short of this standard, thereby undermining the legitimacy of the site-selection process. It is therefore imperative that Ministers give due regard to these deficiencies when considering the representations made.

The Environmental Impact Assessment (EIA) submitted with this application serves as the primary evidential foundation for the Scottish Ministers' determination. However, the critical issue is not the volume or extent of the assessment but its sufficiency in addressing potential significant effects comprehensively. The application identifies various pathways to significant environmental impacts but subsequently fails to investigate them fully or applies methodologies that do not substantiate the conclusions reached. For example, the landscape assessment relies on outcomes derived from a distance pattern that is not supported by its stated methodology. Similarly, the heritage assessment lacks demonstration of applying its own integrity test, and the socio-economic assessment omits any place-based analysis of the affected islands. These shortcomings indicate that the environmental information presented is incomplete and insufficiently robust to support a fully informed decision.

Furthermore, the application places undue reliance on future assessments, post-consent plans, monitoring measures, and additional approvals to address outstanding concerns. Such reliance is inconsistent with the requirements of the EIA Regulations, which mandate that likely significant effects must be understood and evaluated prior to determination. The Scottish Ministers are obliged to make their decision based solely on the evidence currently before them, rather than on assumptions that unresolved matters will be satisfactorily addressed at a later stage.

In this context, the applicant has not demonstrated that the environmental information submitted meets the necessary adequacy standards for a proper assessment. Consequently, the EIA as presented fails to provide the Scottish Ministers with a sufficiently comprehensive evidential basis to support the granting of consent.

1.1.245 Effects on Local Area

The applicant's assessment significantly underestimates the direct and substantial effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby undermining the reliability of the overall environmental and heritage impact evaluation. Islay and Colonsay, being the closest inhabited islands to the proposed development area—which lies immediately north-west of Islay and west of Colonsay—receive an assessment that is fundamentally flawed. The application primarily considers Islay only in terms of its potential as a direct project location, rather than recognising it as an affected island community with distinct social and economic characteristics. Notably, the Atlantic-facing communities of Islay confront the nearest edge of a 448 square kilometre development zone, yet there is no place-based analysis of how this proximity would influence their setting, economy, or community life.

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

The applicant's assessment significantly underestimates the scale and importance of visual, community, and heritage impacts on Iona, resulting in an incomplete evaluation of environmental and social effects. The Coastal Character assessment identifies the Sound of Iona as having high sensitivity, with direct orientation towards the development area and extensive visibility. The geographical extent of change is large, with turbines visible across approximately 39 degrees of the horizon from a distance of about 21 kilometres, producing a moderate and significant overall effect. Similarly, the highly sensitive west coast of Iona experiences widespread visibility of the proposals, and the applicant acknowledges significant effects on residents and visitors throughout much of the island, including at Dùn Ì, the island's highest point.

Iona's internationally important monastic landscape, comprising the Abbey, the Nunnery, and high crosses, derives its significance from pilgrimage, arrival by sea, and movement through the landscape, as noted in the applicant's baseline. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet no visualisation has been provided from key vantage points such

as the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn. This omission undermines the thoroughness of the heritage impact assessment.

Community concerns are also insufficiently addressed. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal. Despite the applicant's consultants identifying habitability as a potential pathway of effect on the community, no assessment of this has been undertaken. The perceived scale of the turbines further illustrates the magnitude of visual impact; for example, Ben Hynish on Tiree, a familiar landmark standing 141 metres tall and visible from Iona at approximately 33 kilometres, would be overtopped by the largest turbines by around 194 metres at a closer distance of roughly two-thirds that span.

Taken together, these factors demonstrate that the applicant's assessment does not fully capture the significant and wide-ranging effects on Iona's landscape, heritage, and community, calling into question the accuracy and completeness of the environmental and social impact evaluation.

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

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

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

The applicant's assessment of the potential effects on designated landscapes and island communities appears to underestimate the scale and significance of those effects, particularly when compared with the mitigation measures proposed. For example, while the assessment acknowledges the panoramic maritime qualities of Staffa within the Loch na Keal National Scenic Area, it concludes that the scale of change there would be small and the effect not significant, despite the island's status as one of the most celebrated small islands in Europe and its location approximately

35 kilometres from the development area. This conclusion sits uneasily with NatureScot's guidance to assess effects up to 30 kilometres, suggesting that important visual and experiential qualities may not have been fully accounted for.

Further concerns arise in relation to Ulva, also within the Loch na Keal National Scenic Area, which supports a small, re-establishing, community-owned population whose recovery depends heavily on the unspoilt seascape and setting threatened by the development. The absence of any specific assessment of effects on Ulva undermines confidence that the unique cultural and natural qualities vital to this vulnerable community have been adequately considered. Similarly, the Jura National Scenic Area, assessed at a distance of approximately 28 to 32 kilometres, is attributed a High sensitivity due to its wild and undeveloped Atlantic outlook, yet the applicant assigns only a Medium to Low magnitude of impact, citing distance and retained landforms as mitigating factors. This approach risks undervaluing the fundamental qualities upon which the designation is based.

The Scarba, Lunga and the Garvellachs National Scenic Area, situated roughly 35 to 40 kilometres from the development, receives an equivalent treatment, with limited recognition of potential adverse effects. Collectively, these assessments suggest a pattern of insufficient weighting given to the intrinsic wildness and cultural significance of these landscapes and island communities. To ensure the protection of their natural and cultural qualities, a more rigorous and comprehensive evaluation of impacts, including those on vulnerable island populations, is necessary. Without this, the planning balance remains uncertain, and the effectiveness of proposed mitigation measures is open to question.

The practical consequence of the applicant's assessment is a significant underestimation of the visual and landscape impact on the island of Tiree. By attributing a Low magnitude of change to the South Tiree coastal area, despite its designation as of High sensitivity at approximately 35 kilometres distance, the evaluation fails to adequately reflect the scale of alteration that would result from the proposed development. This misjudgement risks misleading decision-makers and the public as to the true extent of effects on this sensitive environment.

Tiree's landscape character is exceptionally distinctive, defined predominantly by the expansive sea and sky that surround it. As a low-lying island with its highest elevation at Ben Hynish of only 141 metres, its open oceanic horizon is a fundamental element of its sense of place. The introduction of turbines reaching heights of up to 335 metres would create vertical structures far exceeding any existing features, thereby fundamentally altering the seascape. The applicant's conclusion of Low magnitude change is therefore incongruous with the island's openness and sensitivity, representing a serious understatement of the visual intrusion and consequent impact.

In light of the above, the assessment's reliability is compromised by this understated evaluation of effects on Tiree's sensitive and distinctive landscape character. A more accurate and robust appraisal is necessary to ensure that the scale and significance of change are properly recognised, thereby informing an appropriate planning decision that respects the island's unique environmental qualities.

The applicant’s assessment notably omits consideration of significant effects on several mainland and island communities that have direct views of, and economic reliance upon, the seascape in question. Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by local residents, faces the development waters from the east. Yet, the assessment fails to examine the potential impacts on this finely balanced community and its economy.

Similarly, Ardnamurchan Point, the most westerly point of the British mainland, offers panoramic views along the Hebridean seaboard which attract visitors throughout the peninsula. These seaward panoramas represent receptors of high sensitivity; however, the distance-based moderation approach applied in the assessment overlooks the quality and importance of these views and their associated economic benefits to the local area.

Furthermore, the west coast of Kintyre comprises a series of communities whose identity, character, and visitor economy are closely tied to the open Atlantic seaboard looking towards Islay, Jura, and the surrounding waters. The Treshnish Isles and other nearby small islands and mainland coasts with views towards the proposed development site share a similar reliance on these seascapes. The exclusion of these receptors from the applicant’s assessment undermines the comprehensiveness and accuracy of the overall evaluation.

There remains significant uncertainty regarding the applicant’s approach to assessing environmental effects beyond 20 kilometres. The evidence clearly shows a consistent pattern whereby, whenever a highly sensitive receptor is located beyond this distance threshold, the assessment systematically moderates the magnitude of change and discounts the resulting effect. Crucially, this approach means that the communities actually experiencing these effects have not been subject to any place-specific evaluation. Such a methodology fundamentally undermines the integrity of the environmental impact assessment by failing to provide a comprehensive and accurate account of impacts on sensitive receptors at greater distances. It is therefore essential that the assessment be revisited to ensure that all affected communities receive proper consideration.

1.1.246 Personal Observations

In addition to the planning matters above, I am personally concerned because: The proposal could negatively affect my family and local community by altering the character of the coastline, increasing visual and noise disturbance, and putting pressure on the natural environment we rely on for recreation and wellbeing. Large-scale offshore infrastructure risks changing how we use and enjoy the area, and may affect local wildlife, tourism and the sense of place that our community values. These impacts together could reduce the quality of life for residents and visitors.

Based on my own local knowledge, I also wish to highlight that: Yes. I believe several local features require greater consideration, including the coastal landscape character, sensitive wildlife habitats and the wider seascape setting. These areas support important bird species, marine life and community use, and any change to

their visual quality or ecological condition would have a disproportionate impact. The proposal should more fully assess how these environmental and community assets could be affected and whether the mitigation offered is adequate.

Finally, I would also ask the Scottish Ministers to consider: Yes. I would like Scottish Ministers to ensure that all cumulative impacts are fully assessed, including long-term effects on the coastal environment, local communities and the wider seascape. I also ask that any uncertainties or gaps in the applicant's Environmental Impact Assessment are carefully examined so that decisions are based on a complete and robust understanding of the potential risks.

1.1.247 Further Comments

I ask that Scottish Ministers ensure the proposal is assessed with full regard to long-term environmental resilience, cumulative offshore development pressures and the importance of safeguarding coastal character. Any remaining uncertainties in the evidence base should be examined carefully so that decisions are made with a complete understanding of the potential impacts on the environment and local communities.

1.1.248 Summary

The proposal for the MachairWind Offshore Wind Farm fails to demonstrate compliance with the relevant statutory and policy frameworks governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the coastal communities and heritage; however, published analyses of the applicant's documentation reveal that these impacts have been underestimated. Crucially, the requisite heritage assessment has not been conducted, and although the effects upon the island communities were identified, no assessment of these impacts has been undertaken. Additionally, the ecological criteria necessary for approval have not been demonstrated as achievable. It is also pertinent to note that only a portion of the project is subject to consideration by the Scottish Ministers.

In light of these shortcomings, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to reject the accompanying marine licence application.

Should the Ministers decide against refusal, it is requested that they require the submission of further environmental information and enhanced visualisations. Furthermore, the determination of the applications should be deferred until after a public inquiry, enabling a comprehensive examination of the issues raised in this objection. Regardless of the outcome, I ask that the Ministers provide clear and explicit conclusions within their decision, specifically addressing the effects on cultural heritage and the impacted island communities.

Yours faithfully,

[Redacted]

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

Member of the public 527
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, which are the subject of application 00012385 seeking consent under section 36 of the Electricity Act 1989, alongside application 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. The applicant, MachairWind Limited (ScottishPower Renewables), proposes to develop an offshore wind farm with an installed capacity of approximately 2 GW. This development would consist of between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip, situated within a designated Windfarm Development Area spanning roughly 448 square kilometres. The site lies to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in proximity to the islands and coastal communities of the southern Hebrides.

It is requested that this letter be formally recognised as an objection, that my details be recorded accordingly, and that I receive notification of the final decision in relation to these applications.

The following sections detail the planning and environmental grounds underpinning this objection, framed within the statutory and policy context applicable to the determination of these proposals. It is important to emphasise that the onus lies with the applicant to provide robust and sufficient evidence to satisfy all relevant statutory tests. Objectors bear no legal obligation to disprove the proposals. Upon careful consideration of the evidence submitted, it is clear that the applicant has failed to meet this burden. Consequently, the applications should be refused consent.

1.1.249 Legislative and Policy Framework

The proposal fails to comply with the mandatory requirements for environmental impact assessment and habitats regulations assessment, rendering the application incomplete and legally deficient. Under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations, it is a statutory obligation that the likely significant environmental effects of any such proposal be thoroughly identified, assessed, and reported prior to any determination. This procedural requirement ensures that decision-makers are fully informed of the environmental consequences before granting consent. Furthermore, the Habitats Regulations impose a clear duty to assess the effects of the proposal on European protected sites in strict accordance with the applicable statutory tests. This assessment is essential to safeguard protected habitats and species from potential adverse impacts.

In this case, the applicant has failed to demonstrate compliance with these legal requirements. The evidence provided does not adequately identify or assess the significant environmental effects, nor does it satisfy the statutory tests mandated by the Habitats Regulations. Such deficiencies and omissions constitute a fundamental breach of the applicable legal and policy framework. As established by the governing legislation and confirmed by the evidence, where compliance with environmental impact assessment and habitats regulations is not demonstrated, or where there are

clear deficiencies and conflicts with the statutory framework, these matters must weigh decisively against the granting of consent.

In conclusion, the absence of a comprehensive and compliant environmental impact assessment and habitats regulations assessment means that the proposal does not meet the essential legal standards required for determination. Consequently, the application should be refused on the grounds of non-compliance with The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the Habitats Regulations.

1.1.250 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to comply with multiple policies within the National Planning Framework 4 that protect nationally important landscapes, heritage assets, and biodiversity. Policy 11 operates in conjunction with Policy 4(c) and 4(d), which safeguard National Scenic Areas and nationally important landscapes from significant adverse effects on their designated qualities; Policy 7, including 7(h) concerning scheduled monuments and 7(c) and 7(d) relating to the setting of historic assets; and Policy 3 on biodiversity. The submitted evidence demonstrates that the proposal would result in significant adverse impacts on nationally designated landscapes and seascapes. Furthermore, it has not been shown that the cultural significance of scheduled monuments and their settings would be preserved, nor that island communities would be adequately protected. Additionally, the ecological assessments required under Policy 3 have not been satisfactorily met. Taken together, these failures establish clear conflicts with the relevant NPF4 policies intended to safeguard designated assets.

1.1.251 Cultural Landscape, Archaeology and Historic Environment

The applicant’s assessment purports to follow Historic Environment Scotland’s established methodology for evaluating effects on the setting of historic assets, which necessitates an appraisal of how changes to setting influence its contribution to cultural significance and whether the integrity of that setting is maintained. This methodology explicitly clarifies that visual change alone should not be directly equated with adverse impact. However, the operational assessment submitted, as examined in the Methodological Audit relying solely on the applicant’s Appendix 14.3, identifies relevant heritage attributes but fails to demonstrate the critical evaluative step of assessing the integrity of setting in accordance with the accepted methodology.

Instead, the assessment primarily describes aspects of visual change—such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—and then asserts, without evidential evaluation, that the integrity of setting is adequately retained. The Audit highlights that this evaluative step, required by the methodology to underpin conclusions about heritage impact, is absent in all examined examples. Consequently, the reliability of the applicant’s conclusions regarding the effects on the setting of historic assets is undermined, casting doubt on the robustness of the heritage impact assessment as a whole.

The applicant's baseline assessment acknowledges that the cultural significance of the heritage assets in question arises from a combination of factors, including pilgrimage, arrival by sea, movement through an active cultural landscape, and the interrelationships between monuments, spirituality, and the encompassing landscape and seascape. Importantly, these qualities are experienced dynamically through movement rather than from static viewpoints. Despite this recognition, Historic Environment Scotland's consultation responses, as recorded within the application, have highlighted the need for additional viewpoints to ensure these broader experiential and cultural landscape qualities are adequately captured and represented. This suggests that the current assessment may not fully encompass the depth of the heritage assets' cultural significance, potentially leading to an incomplete understanding of the impacts. Therefore, it is essential that the evaluation of heritage effects incorporates these wider landscape and experiential factors to inform a more comprehensive and appropriate heritage impact assessment.

The mitigation measures proposed rely heavily on the findings of the landscape assessment, which serves as a foundational element for evaluating heritage impacts. However, where the landscape effects have been understated, as previously detailed, this has a direct and compounding effect on the credibility of the heritage conclusions. The extent to which landscape changes influence heritage assets is therefore not fully acknowledged, leading to an overall mitigation strategy that may be insufficiently robust.

This interdependency reveals a critical weakness in the assessment framework. Because the heritage conclusions are derived from the landscape assessment, any underestimation of landscape effects inherently carries through to the heritage impact analysis. Consequently, the conclusions regarding heritage impacts cannot be considered fully reliable, calling into question the adequacy of the mitigation measures and the broader planning judgement based upon them.

The practical consequence of the current application is that it fails to provide the necessary assurance that important heritage assets will be adequately protected. This shortcoming directly undermines the proposal's acceptability, as the applicant has not supplied the required evidence to demonstrate that the cultural significance of heritage assets of international and national importance, as well as their settings, will be preserved. Without such demonstration, decision-makers cannot confidently conclude that the development complies with relevant heritage protection policies.

This deficiency engages a number of critical policy provisions. Specifically, the proposal falls short of the requirements set out in NPF4 Policy 7(h), which relates to scheduled monuments, and Policies 7(c) and 7(d), which concern the setting of heritage assets. In addition, it contravenes GEN 6 and the guidance contained within paragraphs 4.22 to 4.23 of the National Marine Plan. These policies and guidance collectively demand robust assessment and clear evidence that development will not harm the integrity or significance of designated heritage sites and their surroundings.

Given the absence of a comprehensive assessment and the failure to demonstrate compliance with these key policies, the Scottish Ministers do not have before them the necessary information to approve the application. The lack of evidence to protect heritage assets represents a fundamental policy conflict that cannot be overlooked.

Consequently, the application should be refused on the grounds of insufficient heritage protection, in line with the established statutory and policy framework.

1.1.252 Effects on Island Communities, Tourism and the Local Economy

The proposal poses a direct threat to the economic foundation of the island communities, which rely heavily on visitors drawn to their unique landscape, seascape, cultural heritage, tranquillity, and remoteness. These qualities, as identified by the applicant's own baseline assessments, are precisely what attract tourism, the primary source of income for these communities.

Any alteration to these defining characteristics would undermine the visitor appeal, leading to a decline in tourism revenue. This reduction would not only affect local businesses but would also jeopardise essential services that depend on a stable population supported by a viable economy.

Ultimately, the loss of visitor-attracted qualities risks the social sustainability and long-term viability of the island communities. Protecting these intrinsic attributes is therefore fundamental to preserving both their economic health and community well-being.

The applicant's socio-economic assessment notably prioritises detailed analysis of port communities while neglecting a comparable place-based evaluation of the island communities directly facing the proposed development. Although their consultants recognised habitability as a potentially significant pathway for impacts on these islands, no subsequent assessment was undertaken to determine how the proposal might affect their habitability. This omission undermines confidence in the mitigation measures proposed, as these are predicated on an incomplete understanding of local sensitivities.

Island economies differ fundamentally from regional averages, being heavily concentrated in sectors that depend on the very qualities attracting visitors. Such reliance does not diminish their vulnerability; rather, it intensifies their exposure to any adverse changes. The applicant's conclusion that these communities exhibit low sensitivity to tourism effects, derived without specific place-based analysis, cannot be regarded as evidence-based but instead represents an unsubstantiated assumption. This calls into question the adequacy of the assessment's methodology and its capacity to inform appropriate mitigation.

Given these concerns, the socio-economic impacts on island communities require a more rigorous and locally focused evaluation. Without this, the assessment risks underestimating the true extent of potential harm and fails to provide a robust foundation for effective mitigation strategies. It is therefore essential that further, detailed place-specific analysis be undertaken to ensure that the unique vulnerabilities of island communities are properly understood and addressed.

The applicant acknowledges that island communities require particular scrutiny but has failed to undertake the necessary assessment to understand the effects of the proposal on these communities. This omission means that it has not demonstrated compatibility with sustainable island communities, nor shown that the statutory duties

owed to them have been discharged. This failure contravenes the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions be based on sound socio-economic evidence and adopt a precautionary approach where evidence is lacking. Furthermore, the proposal does not comply with NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, both of which require that the interests of island communities be assessed and given due weight through meaningful engagement from the outset to conclusion. Consequently, the proposal does not meet the necessary planning and statutory standards for assessing and protecting island communities.

1.1.253 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, with surrounding waters that support seabirds, marine mammals, and basking sharks. Introducing large-scale construction, operation, and decommissioning activities into this sensitive environment over several decades risks significant adverse environmental effects. This ecological importance and sensitivity warrant careful consideration of the potential impacts arising from the proposal.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically focused on the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are typically prepared in circumstances where an adverse effect on the integrity of a protected site cannot be ruled out. Their submission represents a notable aspect of the application, demonstrating that the applicant acknowledges the potential for such impacts.

By providing these materials, the applicant indicates an awareness that the Scottish Ministers may ultimately reach a different conclusion regarding the presence or absence of adverse effects on the protected site’s integrity. This cautious approach reflects an understanding of the sensitivity of the designated area and the importance of addressing possible ecological consequences in a structured manner.

In submitting these derogation and compensation documents, the applicant seeks to ensure that, should any adverse impacts be identified, appropriate measures can be considered to mitigate harm to the guillemot population. This approach aligns with the regulatory framework governing protected sites, whereby derogations and compensatory provisions are necessary components when potential effects cannot be excluded at the outset.

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

This legal test is supported by key planning policies, including GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of the National

Planning Framework 4. These policies collectively reinforce the necessity for rigorous assessment and the precautionary approach embedded in the Habitats Regulations. They ensure that environmental protection is paramount in the decision-making process concerning developments potentially affecting protected habitats and species.

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

The practical consequence of the applicant's failure to demonstrate compliance with statutory tests is that the application falls short of the legal safeguards designed to protect internationally important ecological features. Without clear evidence that these tests can be satisfied, proceeding with consent risks significant and potentially irreversible harm to protected habitats and species.

The submitted evidence, including the applicant's own derogation documents, reveals a troubling lack of certainty regarding the impacts on these internationally significant ecological assets. This absence of demonstrable compliance with statutory requirements undermines confidence in the applicant's ability to mitigate or avoid harm, a prerequisite for lawful consent under the relevant environmental protections.

Given this fundamental shortcoming, it is not appropriate to grant planning permission. The statutory framework exists precisely to ensure that developments do not compromise vital ecological interests, and the failure to meet these tests justifies refusal in order to uphold statutory obligations and conserve internationally important habitats and species.

1.1.254 Cumulative and In-Combination Effects

The assessment before the Scottish Ministers considers only a portion of the proposed development, notably excluding the export cable corridor and onshore transmission works, which are essential for the wind farm's operation. This segmentation results in a fragmented evaluation where the cumulative effects of the entire project are never jointly examined. Instead, significant components are left to separate, subsequent consenting processes following the principal decision. Such an approach fundamentally conflicts with established legal principles, as confirmed in the Raeshaw Farms case, which mandates that a project must be assessed in its entirety rather than being artificially divided into smaller parts with seemingly lesser individual impacts. This incomplete assessment method undermines the integrity of the decision-making process and fails to provide a comprehensive understanding of the project's overall environmental and operational implications.

The proposed mitigation measures outlined in the Environmental Impact Assessment must be carefully weighed against the baseline from which cumulative effects are

assessed. However, the cumulative impact assessment relies heavily on the conclusions of the landscape, heritage, and socio-economic evaluations conducted earlier in the report. Given that these foundational assessments appear to understate certain effects, the effectiveness of mitigation cannot be fully appreciated without addressing this initial shortfall.

It is important to recognise that the cumulative assessment effectively compounds any underestimation present in the underlying baseline. If the baseline itself minimises impacts, then the aggregation of this proposal with other existing, consented, and foreseeable developments will similarly reflect an artificially reduced scale of combined effects. This means the true cumulative impact on landscape character, heritage assets, and local socio-economic conditions may be significantly greater than reported.

Therefore, the cumulative effects assessment as presented is unreliable and does not provide a robust foundation for decision-making. Until the initial landscape, heritage, and socio-economic assessments are revisited to ensure accurate representation of impacts, the cumulative assessment cannot be considered a sound basis for concluding that the combined effects of development will be acceptable. Further scrutiny and refinement are necessary to establish a realistic understanding of cumulative impacts.

The assessment finds that the proposal fails to comply with the requirements set out in GEN 21 and paragraph 4.85 of the National Marine Plan, as well as NPF4 Policy 11(e), and the Environmental Impact Assessment Regulations concerning project splitting. The applicant has not satisfactorily demonstrated that the cumulative and in-combination effects of the development have been reliably identified and assessed. Moreover, the effects of the project as a whole, including any deferred works, have not been adequately considered. It is therefore requested that the decision-making process explicitly addresses the treatment of these deferred works to ensure full compliance with relevant policies and regulatory obligations. In conclusion, without this comprehensive assessment, the proposal does not meet the necessary planning and environmental standards and should not be approved in its current form.

1.1.255 Public Engagement, Site Selection and Environmental Information

When comparing the consultation process for this application with the standards set out in GEN 18 of the National Marine Plan and the principles of effective public participation enshrined in the Aarhus Convention, it is clear that the affected communities have not been afforded a realistic opportunity to engage meaningfully. The applicant’s request that Scottish Ministers place significant weight on the site-selection process makes the quality of public participation at that stage, as well as during the application phase, directly relevant. However, these stages have been marked by persistent deficiencies. Notably, the application itself consists of many thousands of pages of complex technical material, yet the consultation period has coincided with the busiest months of the year for island communities. This timing is particularly problematic because residents are occupied with continuous work throughout the visitor season, and specialist advice is correspondingly less

accessible. In contrast, the applicant has had years to prepare its case and has had substantial professional and financial resources at its disposal.

These circumstances fall short of the standards required to ensure effective public participation in decisions of such magnitude. The conditions under which local communities have been expected to respond have not been conducive to informed and meaningful engagement. This imbalance undermines the legitimacy of the site-selection process and the consultation as a whole. It is essential that Scottish Ministers bear this firmly in mind when considering the representations made, recognising that the deficiencies in consultation timing and public participation materially affect the robustness of the decision-making process.

The Environmental Impact Assessment forms the essential evidential foundation for the Scottish Ministers' decision-making on this application. However, significant deficiencies undermine its sufficiency. Across several critical topics, the assessment identifies potential pathways to significant effects but fails either to investigate them thoroughly or to apply appropriate methodologies. For instance, the landscape assessment's conclusions rely on a distance-based pattern absent from its own stated methodology; the heritage assessment does not adequately apply its declared integrity test; and the socio-economic assessment omits any place-based analysis of the affected islands.

Moreover, the application frequently depends on future assessments, post-consent plans, monitoring schemes, and subsequent approvals to address unresolved issues. This approach conflicts with the requirements of the Environmental Impact Assessment Regulations, which mandate that likely significant effects be comprehensively understood prior to determination. Reliance on uncertain future measures cannot substitute for robust, complete information at this decisive stage.

In conclusion, the Scottish Ministers must base their determination on the evidence currently before them, not on assumptions that outstanding matters will be satisfactorily resolved after consent. The applicant has not demonstrated that the environmental information submitted meets the standard of adequacy necessary for an informed decision. Consequently, the assessment as presented is insufficient to support approval.

1.1.256 Effects on Local Area

The applicant's assessment significantly underestimates the scale and importance of the visual, community, and heritage impacts on Iona, thereby compromising the accuracy of the environmental and social impact evaluation. The Coastal Character assessment identifies the Sound of Iona as having high sensitivity, with direct orientation towards the development area and extensive visibility. It describes a large geographical extent of change, with effects on the ferry crossing between Fionnphort and Iona, and an overall effect rated as Moderate and Significant. This impact extends approximately 21 kilometres, with turbines spanning around 39 degrees of the horizon. Similarly, the West Coast of Iona is assessed as highly sensitive with widespread visibility, and the applicant acknowledges significant effects for residents and visitors across much of the island, including at Dùn Ì, Iona's highest point.

Iona's monastic landscape, encompassing the Abbey, the Nunnery, and the high crosses, is of international heritage importance. The applicant's own baseline recognises this significance as closely tied to pilgrimage, arrival by sea, and movement through the landscape. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself; however, no visualisation has been provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, a notable omission given the heritage context. Furthermore, a household consultation on Iona revealed that 92 per cent of respondents object to the proposal. Despite habitability being identified by the applicant's consultants as a potential pathway of effect on the community, it was not assessed in the submitted documentation.

The perceived scale of the turbines can be further appreciated by comparison with a familiar landmark: Ben Hynish on Tiree, which stands 141 metres high and is visible from Iona at approximately 33 kilometres. The largest turbines proposed would exceed Ben Hynish's height by approximately 194 metres, despite being located at roughly two-thirds of that distance, emphasising their imposing presence. In light of these quantified impacts and the significant omissions in assessment, the full extent of the proposal's effects on Iona must be reconsidered.

The applicant's assessment acknowledges significant effects on several key locations within Mull and the Ross of Mull, yet it fundamentally underestimates the full extent of visual, economic, and community impacts, particularly in relation to designated landscapes and tourism-dependent settlements. The Ross of Mull South coastal area is recognised as having high sensitivity at distances of approximately 22 to 24 kilometres and is attributed a medium magnitude of effect. Notably, significant effects are accepted at Erraid and on the Core Paths of the Ross. Fionnphort, serving as the gateway to Iona and the primary point of embarkation for visitors, is acknowledged by the applicant as significantly affected. This community's experience is intimately tied to visitor flows, yet the assessment stops short of fully addressing the implications of this impact.

Similarly, across Mull, significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Areas are accepted. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is consistently rated as having high sensitivity at distances ranging from approximately 21 to 33 kilometres. Despite this, the applicant limits the attributed magnitude of effect to medium, a conclusion that appears inconsistent given the recognised sensitivity of this nationally designated landscape. The treatment of the Wilderness and Gribun Rocks coastal area further exemplifies a concerning reliance on distance-based reasoning. The applicant's own assessment states that, due to viewing distances exceeding 30 kilometres, the scale of change is judged to be small. This approach neglects the importance of seascape character and the intrinsic qualities valued by local communities and visitors alike.

Moreover, Mull's west-facing tourism economy, including its wildlife boat operations and accommodation providers in western townships, depends heavily on the unspoilt Atlantic seascape which the proposed development would industrialise. Crucially, none of these communities have been afforded a place-based assessment that

accurately reflects the socio-economic consequences of such change. This omission further weakens the robustness of the applicant’s overall evaluation.

In conclusion, while the applicant accepts some significant effects on sensitive locations and communities within Mull and the Ross of Mull, the assessment fails to comprehensively capture the scale and nature of impacts on designated landscapes and tourism-reliant coastal communities. The reliance on distance as a primary determinant of effect magnitude, combined with the absence of detailed, place-specific evaluations for key settlements, results in an inadequate appraisal that underestimates the development’s potential to adversely affect the visual environment, local economy, and community wellbeing.

1.1.257 Personal Observations

In addition to the planning matters above, I am personally concerned because: I donate money to the Mull and Ionia monastaries and something like that might cause their closure and the end of at least the community on Ionia and their environment. It might take Father Seraphim Aldea's videos away from me.

Based on my own local knowledge, I also wish to highlight that: Yes I believe something like that would completely destroy the fragile ecosystem of the area. Especially the birds.

Finally, I would also ask the Scottish Ministers to consider: I would like them to take into account the wishes and feelings of the monastaries on Ionia and Mull, the communities on the islands and what they will do with the loss of tourism. What they will do if those communities go belly up because of the windmills or at least some of them?

1.1.258 Further Comments

Please don't allow these windmills to be built. I have watched many Orthodox videos from Ionia and Mull and I am a paying contributor to them. I love Father Seraphim Aldea and I think I have listened to and watched almost all of his videos. I would really love to visit or go on a pilgramige to Mull and Ionia one day and I would hate for that opportunity for me as well as for others to be taken away. They are beautiful historic islands that saints once lived on. I would hate to see the environment destroyed, the wildlife wiped out and the communities of at least some of the islands destroyed. Isn't there somewhere else these monstrosities could be built?
Who would want to tour these islands after this?

1.1.259 Summary

The proposal for the MachairWind Offshore Wind Farm has not been shown to satisfy the relevant statutory and policy requirements governing its determination. The applicant’s own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal area. Moreover, the applicant’s published analyses reveal that the extent of these impacts has been underestimated, and that an essential heritage assessment remains incomplete. Although the effects on the island communities involved were

identified, no thorough assessment of these impacts has been undertaken. In addition, the ecological criteria necessary for approval have not been demonstrated as achievable. It is also important to note that the application before the Scottish Ministers does not encompass the entire project.

In light of these substantial deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to deny the related marine licence.

Should the Ministers consider granting consent, I request that they require the submission of additional environmental information and enhanced visualisations. Furthermore, I propose that the applications be determined only following a public inquiry, providing an opportunity for detailed scrutiny of the issues raised in this objection. Regardless of the outcome, I also ask that the Ministers explicitly address and record their conclusions concerning the effects on cultural heritage and the island communities affected by the development within their decision rationale.

Yours faithfully,

[Redacted]

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

Member of the public 528
Dear Sir/Madam,

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

The project under consideration seeks approval for an offshore wind farm with an installed capacity of approximately 2 gigawatts. The development entails the installation of between 91 and 144 turbines, each reaching a maximum blade tip height of up to 335 metres. The proposed site encompasses a Windfarm Development Area spanning around 448 square kilometres of marine environment situated to the north-west of Islay and west of Colonsay. This location lies approximately 21 kilometres from the island of Iona and is in close proximity to the islands and coastal communities of the southern Hebrides.

The grounds for objection are detailed below, structured in accordance with the pertinent statutory and policy framework that governs the determination of these applications. It is important to emphasise that the onus lies with the applicant to convincingly demonstrate, supported by robust evidence, that all relevant statutory and policy tests are satisfied. Objectors bear no obligation to prove contrary positions. Based on the deficiencies identified herein, it is evident that the applicant has failed to meet this evidential burden, and therefore, consent should be refused.

1.1.260 Legislative and Policy Framework

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

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

The marine licence application fails to demonstrate compliance with the statutory requirements set out in Part 4 of the Marine (Scotland) Act 2010 and the relevant

policies of Scotland's National Marine Plan. As authorisation decisions must be taken in accordance with the National Marine Plan unless relevant considerations indicate otherwise, the absence of demonstrated compliance with key General Policies—including GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts)—is a fundamental procedural and substantive deficiency.

The application's failure to provide sound evidence and to address cumulative impacts, as required by GEN 19 and GEN 21, undermines the statutory assessment process. Moreover, omissions and conflicts with policies protecting the historic environment, landscape, natural heritage, and requirements for effective engagement further demonstrate that the application does not meet the legal and policy framework. These deficiencies are not minor or technical but go to the core of the statutory test for marine licence determination under the Marine (Scotland) Act 2010.

Given these unresolved conflicts and evidential shortcomings, the application cannot be considered compliant with the National Marine Plan policies or the Marine (Scotland) Act 2010. As established by the statutory framework, where compliance has not been demonstrated and deficiencies exist, these matters weigh decisively against the granting of consent. Therefore, the marine licence application should be refused.

The proposal fails to comply with key policies of National Planning Framework 4 (NPF4), which is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. Specifically, the application does not demonstrate compliance with Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy). These policies are directly engaged by the proposal and set clear expectations for the protection and enhancement of biodiversity, the safeguarding of natural places, the conservation of historic assets, and the responsible use of energy. The absence of demonstrated compliance with these policies indicates that the proposal does not meet the standards required by the current national planning framework.

Moreover, the evidence identifies deficiencies and omissions in the application's consideration of these policies, resulting in conflicts with the applicable legal and policy framework. Where such deficiencies and conflicts exist, they weigh decisively against the granting of consent. The failure to provide adequate evidence of compliance or to address the statutory and policy requirements undermines the proposal's legitimacy and renders it inconsistent with the objectives of NPF4. Consequently, the proposal should be refused on the basis that it does not satisfy the mandatory policy tests set out in the National Planning Framework 4.

The proposal fails to comply with the fundamental legal requirements set out in the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations, which mandate that the likely significant environmental effects of any development must be thoroughly identified, assessed, and reported prior to determination. This statutory obligation is not met in

the current submission, resulting in a deficient environmental impact assessment that precludes a lawful and informed decision-making process. Without a comprehensive and robust assessment, the determining authority cannot properly evaluate the environmental consequences of the proposal, thereby undermining the integrity of the planning process.

Furthermore, the proposal does not satisfy the requirements of the Habitats Regulations, which explicitly require an assessment of the effects on European protected sites in accordance with the applicable statutory tests. The absence of a demonstrably adequate habitats regulations assessment means that the potential impacts on protected habitats and species have not been properly considered or mitigated. This omission is a critical failure, as it contravenes statutory duties designed to safeguard biodiversity and protected sites, and it prevents the authority from fulfilling its legal obligations under the Habitats Directive and related domestic legislation.

Given these clear deficiencies and omissions in both the environmental impact assessment and the habitats regulations assessment, the proposal is in direct conflict with the applicable legal and policy framework. Where compliance with these statutory requirements has not been demonstrated, the law and planning policy dictate that such failures must weigh decisively against the granting of consent. Consequently, the application should be refused on the grounds that it does not meet the essential environmental assessment and habitats protection standards required by law.

The proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018, resulting in a fundamental procedural and substantive deficiency. The Islands (Scotland) Act 2018 explicitly requires that the interests of island communities be taken into account and given due weight during the decision-making process. This statutory obligation is not a discretionary matter but a legal requirement that must be demonstrably fulfilled.

In this case, there is no evidence that the proposal has adequately addressed or incorporated the specific interests of island communities. The absence of such consideration constitutes a clear omission and a failure to comply with the applicable legal framework. Where compliance with the Islands (Scotland) Act 2018 has not been demonstrated, or where the evidence reveals deficiencies or omissions in this regard, these shortcomings must weigh against the granting of consent.

Accordingly, the proposal’s failure to properly consider and give due weight to the interests of island communities as required by the Islands (Scotland) Act 2018 represents a material conflict with the statutory framework and is a compelling reason to refuse planning permission.

The applicant has failed to demonstrate compliance with all relevant legal and policy requirements. It is the applicant’s responsibility to provide robust, objective, and proportionate evidence that every statutory duty, planning policy, and environmental assessment obligation has been satisfied. In this case, the evidence submitted does not meet this evidential burden. Deficiencies and omissions remain unaddressed,

and conflicts with the applicable legal and policy framework persist. As a result, these unresolved matters weigh decisively against the granting of planning consent.

1.1.261 Conflict with National Planning Framework 4 and the Development Plan

NPF4 Policy 11 sets out a framework supporting renewable energy development, yet it does so explicitly through the application of impact criteria contained within the policy itself. Among these, Policy 11(c) addresses impacts on communities, while Policies 11(d) and 11(e) concern effects on landscape, seascape, and other receptors. It is therefore essential that any proposal aligns with these criteria to benefit from the policy's presumption in favour of renewable energy projects.

In the present case, the proposal fails to satisfy these impact criteria. It would result in significant adverse effects on nationally designated landscapes and seascapes, undermining the policy's protection for such valued environmental assets. Furthermore, the evidence submitted does not adequately demonstrate that the cultural significance of scheduled monuments and their settings would be preserved, nor does it show that island communities would be safeguarded from harm. Additionally, the ecological tests required by Policy 11 have not been proven capable of being met on the basis of the material provided. Consequently, the proposal conflicts with the impact criteria of NPF4 Policy 11, and as such, cannot be regarded as compliant with the policy's requirements.

The proposal fails to comply with multiple policies within the National Planning Framework 4 (NPF4) that safeguard nationally important landscapes, heritage assets, and biodiversity. As set out in Policy 11, alongside Policies 4(c) and 4(d), there is a clear requirement to protect National Scenic Areas and nationally important landscapes from significant adverse effects on the qualities for which they are designated. Additionally, Policy 7—including Policy 7(h) concerning scheduled monuments and Policies 7(c) and 7(d) regarding the settings of historic assets—establishes a duty to preserve the cultural significance of such sites. Policy 3 further imposes rigorous tests to ensure biodiversity is maintained and enhanced.

In this case, the proposal would cause significant adverse effects on nationally designated landscapes and seascapes, undermining the fundamental purpose of these designations. Furthermore, the applicant has not demonstrated that the cultural significance of scheduled monuments and their settings would be adequately protected, nor has it been established that island communities, which are intrinsically linked to these heritage assets, would be safeguarded. Finally, the ecological assessments and tests required under Policy 3 have not been shown to be capable of being met on the evidence submitted. This cumulative failure to satisfy the interrelated policies protecting designated assets constitutes a clear conflict with NPF4 and weighs strongly against the proposal's acceptability.

In comparing the proposed development to the existing terrestrial planning framework, it is apparent that the mitigation measures fail to address the fundamental conflicts identified with the Argyll and Bute Local Development Plan 2. The proposal would adversely affect the landscape, heritage, and community interests that these policies are designed to protect. This failure to adequately

mitigate impacts on land-based assets distinguishes the proposal from acceptable developments that align with the objectives of the Local Development Plan.

Consequently, the proposal is inconsistent with the development plan as a whole, including National Planning Framework 4. The applicant has not provided sufficient evidence to demonstrate that the proposal complies with the relevant policies or that the adverse effects can be appropriately managed. On this basis, the proposal conflicts with the terrestrial development plan framework and should be refused.

1.1.262 Seascape, Landscape and Visual Effects

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

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

The applicant's submission incorporates visualisation materials prepared in accordance with NatureScot's visualisation guidance, which explicitly recognises inherent technical and perceptual constraints. This guidance emphasises that printed visualisations are unable to fully replicate the scale and depth that a viewer experiences in situ. Consequently, while the visual evidence serves as an important tool in assessing potential impacts, it cannot be regarded as an exact or complete representation of the real-world visual experience.

Furthermore, the wireline drawings included alongside the photographic panoramas share these limitations. As technical renderings embedded within the visualisations, they do not act as independent corrections or enhancements to the photographic content. Instead, they reflect the same spatial and perceptual restrictions inherent in the source imagery, which must be borne in mind when interpreting their accuracy and reliability.

Given these acknowledged limitations, it is necessary to approach the visualisation materials with a measured understanding of their role and scope. They provide a useful, albeit imperfect, basis for assessing visual effects but should not be the sole or definitive means of judgement. Additional considerations and contextual information remain essential to forming a comprehensive evaluation.

The 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. This change is not merely a temporary inconvenience; from a policy perspective, granting consent effectively endorses the suitability of this seascape for wind farm use. Consequently, the decision carries significant implications for the intrinsic qualities of the night-time seascape, which must be carefully weighed against the benefits of the development.

The proposal fails to comply with key planning policies designed to safeguard landscape and seascape interests. Specifically, the effects of the development engage National Planning Framework 4 (NPF4) Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. The applicant has not demonstrated that its conclusions regarding the scale of these acknowledged effects align with its own established methodology. Furthermore, there is no evidence to show that the proposal meets the requirements of the policies protecting nationally important landscapes and seascapes. On this basis, the proposal does not accord with the relevant policy framework and should be refused.

1.1.263 Cultural Landscape, Archaeology and Historic Environment

The applicant’s assessment fails to demonstrate compliance with the required methodology for evaluating the impact on the setting of historic assets, thereby undermining the reliability of its conclusions regarding heritage effects. Although the applicant adopts Historic Environment Scotland’s established methodology, which mandates an evaluation of whether changes to setting affect the contribution setting makes to cultural significance and whether the integrity of setting is adequately retained, the assessment does not follow through on this crucial evaluative step. Instead, it focuses primarily on describing visual changes—considering factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—before asserting that the integrity of setting is adequately retained. A Methodological Audit, based solely on the applicant’s Appendix 14.3, confirms that while heritage attributes are identified, there is no clear demonstration of how the integrity of setting has been assessed in accordance with the applicant’s own accepted methodology. Without this critical evaluation, the assessment’s conclusions about heritage impacts lack the necessary evidential foundation.

The practical consequence of the current application is that it fails to provide the necessary assurance that important heritage assets will be adequately protected. This shortcoming directly undermines the proposal’s acceptability, as the applicant has not supplied the required evidence to demonstrate that the cultural significance of heritage assets of international and national importance, as well as their settings, will be preserved. Without such demonstration, decision-makers cannot confidently conclude that the development complies with relevant heritage protection policies.

This deficiency engages a number of critical policy provisions. Specifically, the proposal falls short of the requirements set out in NPF4 Policy 7(h), which relates to scheduled monuments, and Policies 7(c) and 7(d), which concern the setting of heritage assets. In addition, it contravenes GEN 6 and the guidance contained within paragraphs 4.22 to 4.23 of the National Marine Plan. These policies and guidance collectively demand robust assessment and clear evidence that development will not harm the integrity or significance of designated heritage sites and their surroundings.

Given the absence of a comprehensive assessment and the failure to demonstrate compliance with these key policies, the Scottish Ministers do not have before them the necessary information to approve the application. The lack of evidence to protect heritage assets represents a fundamental policy conflict that cannot be overlooked. Consequently, the application should be refused on the grounds of insufficient heritage protection, in line with the established statutory and policy framework.

1.1.264 Effects on Island Communities, Tourism and the Local Economy

The applicant's own baseline assessments confirm that the island communities affected by the proposed development rely exceptionally heavily on visitor numbers, with those visitors being attracted primarily by the very qualities identified as landscape, seascape, cultural heritage, tranquillity and remoteness. These attributes are not peripheral to the local economy but form its core appeal; visitors seek out these distinctive characteristics, which define the islands' unique sense of place and underpin their tourism sector. This sector, in turn, sustains a wide range of local services, supports employment, and contributes directly to the social fabric and economic resilience of the communities. Any alteration or degradation of these qualities would therefore have a direct and deleterious impact on the fundamental economic base upon which the islands depend.

Given this intrinsic link, the proposal's potential to diminish landscape, seascape, cultural heritage, tranquillity or remoteness threatens not only the immediate visitor experience but also the longer-term viability of the islands as sustainable communities. A reduction in visitor appeal would likely precipitate a decline in tourism revenue, undermining local businesses and services that are vital to residents' quality of life. This, in turn, could lead to population decline as economic opportunities diminish and community viability is compromised. The evidence thus establishes a clear and significant risk that the proposal would impact adversely on the essential qualities attracting visitors and, through that pathway, imperil the economic and social sustainability of the island communities.

The applicant's socio-economic assessment fails to provide an adequate basis for mitigation, particularly in relation to island communities. While the assessment in Chapter 18 offers detailed analysis of potential port communities at a regional scale, it notably omits any place-based evaluation of the island communities directly affected by the proposal. This omission is critical given that the applicant's own consultants identified habitability as a potentially significant pathway through which the development could impact these communities; yet no specific assessment of island habitability was undertaken.

Island economies differ fundamentally from regional averages, as they are heavily concentrated in sectors most vulnerable to changes affecting the qualities that attract visitors. Rather than reducing sensitivity, reliance on increasing visitor numbers actually intensifies dependence on these at-risk attributes. Consequently, the assessment's conclusion that the island communities have low sensitivity to tourism effects is unsupported by evidence and rests solely on an unsubstantiated assumption. Without a place-based analysis tailored to the unique socio-economic context of the islands, the methodology is flawed and insufficient to understand or mitigate the true impacts on these vulnerable communities.

There remains significant uncertainty regarding the proposal's compliance with established policy and statutory duties concerning island communities. The requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan emphasise that decisions must be based on robust socio-economic evidence, applying a precautionary approach where such evidence is insufficient. Additionally, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 mandate that the interests of island communities are assessed thoroughly and afforded appropriate weight, with meaningful engagement from the earliest stages through to the final decision. This framework is designed to ensure that island communities, which often have distinct social and economic characteristics, are not overlooked or adversely impacted by development proposals.

However, the applicant has acknowledged the need for particular scrutiny of island communities but has failed to undertake the necessary assessment to understand the effects of the proposal on these communities. There is no demonstration that the proposal aligns with the principles of sustainable island communities, nor that the statutory duties towards these communities have been discharged. This lack of compliance with key policy and statutory requirements undermines confidence that the proposal can proceed without detrimental consequences to island communities. Accordingly, it is concluded that the application should not be approved in its current form, given its failure to meet the essential standards of assessment and protection for island communities.

1.1.265 Ecology, Biodiversity and Habitats Regulations

The proposed development would introduce extensive construction, operational, and decommissioning activities into an environment recognised for its ecological sensitivity, including Priority Marine Features and Annex I habitats present within the site. These activities would occur over several decades, representing a scale and duration of disturbance far exceeding typical mitigation capacities. While mitigation measures may be proposed to reduce impacts, the sheer magnitude and longevity of the development's footprint present a significant challenge to their effectiveness.

Furthermore, the surrounding waters serve as habitat for protected species such as seabirds, marine mammals, and basking sharks, all of which could be adversely affected by the development's activities. The presence of these species, alongside the Priority Marine Features and Annex I habitats, underscores the ecological importance of the area and the potential for significant adverse environmental effects. Given these factors, the proposal raises substantial concerns regarding its compatibility with the conservation of sensitive marine ecosystems.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan, specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents represent recognised mechanisms intended to address potential adverse impacts on protected sites when it cannot be conclusively ruled out that the proposal would maintain site integrity. Their inclusion signals the applicant's awareness of possible significant effects and a preparedness to implement measures in line with derogation provisions.

It is important to understand that such submissions are typically prepared for situations where adverse effects on the integrity of a protected site are uncertain or likely. The presence of these documents within the application is a critical feature, as it highlights that the applicant does not categorically exclude the possibility of harm. This is a prudent step intended to facilitate regulatory consideration and possible mitigation, reflecting an approach that accounts for ecological sensitivities and the need for compensatory action.

Nevertheless, the applicant acknowledges that Scottish Ministers may arrive at a different conclusion regarding adverse effects than the applicant's own assessment. This recognition underscores that the submitted derogation and compensation documents serve as precautionary and responsive measures rather than definitive proof of no impact. In this context, the documents form a necessary part of the application's overall environmental evaluation, contributing to informed decision-making about the proposal's acceptability and the adequacy of proposed mitigation.

Mitigation, compensation proposals, and future monitoring measures, while important components of development planning, do not alone satisfy the stringent statutory tests required under the Habitats Regulations. The competent authority must be assured beyond reasonable scientific doubt that the proposal will not adversely affect the integrity of the protected site before consent can be lawfully granted. This high evidential threshold places the onus squarely on the applicant to demonstrate compliance, rather than relying solely on proposed mitigation or compensation strategies.

This legal framework is reinforced by relevant policy provisions, including GEN 9 and GEN 13 of the National Marine Plan, alongside Policies 3, 4(b), 4(e), and 4(f) of NPF4. Together, these establish a comprehensive and rigorous approach to safeguarding protected habitats and species, ensuring that any development proposals undergo robust assessment consistent with the Habitats Regulations. Consequently, planning consent must be withheld unless these exacting requirements are fully met.

The practical consequence of the applicant's failure to satisfy the statutory tests is that consent should not be granted, as it risks harm to internationally important ecological features that these legal protections are designed to safeguard. The evidence submitted, including the applicant's own derogation documents, reveals a lack of sufficient certainty that the necessary statutory criteria can be met. This uncertainty undermines the fundamental legal requirement to ensure that habitats and species of international importance are protected from adverse effects.

The statutory tests in question are clear and stringent, reflecting the high level of protection afforded to designated ecological assets. The applicant bears the burden of demonstrating beyond reasonable doubt that these tests are satisfied before development consent can be lawfully granted. However, the applicant's submissions fall short of this standard, as the derogation documentation fails to provide conclusive proof that the proposal will not adversely affect the integrity of protected habitats or species.

Given this failure, it is imperative that the application be refused on the grounds of non-compliance with statutory environmental safeguards. Granting consent in the absence of demonstrated compliance would set a dangerous precedent, potentially compromising the conservation objectives established for internationally important ecological sites. Therefore, the application should not proceed without clear and unequivocal evidence that the statutory tests can be met.

1.1.266 Cumulative and In-Combination Effects

There is significant uncertainty arising from the current approach to assessing the project, as only a portion of it is presently before the Scottish Ministers. Critical components, namely the export cable corridor and the onshore transmission works, are excluded from this application and deferred to subsequent proposals. Without these elements, the wind farm cannot function, yet their impacts are not considered alongside the main project in a single, comprehensive assessment.

This fragmented approach results in an incomplete evaluation of the project's overall effects. By deferring important parts to later consenting processes, the cumulative and interrelated impacts cannot be properly understood or weighed at the principal decision stage. Such segmentation raises concerns about the adequacy and legality of the environmental and planning assessments undertaken to date.

Importantly, this method is contrary to established legal principles. The courts, in the Raeshaw Farms case, have affirmed that a project must be assessed in its entirety and not artificially divided into smaller parts whose individual impacts might appear less significant. Therefore, the current assessment process undermines these principles by effectively salami-slicing the project, which calls into question the validity of the consent decision based on incomplete information.

The cumulative impact assessment fails to provide a reliable evaluation of the combined effects because it relies on flawed baseline assessments, resulting in an understated starting point. Specifically, the environmental impact assessment's underlying landscape, heritage, and socio-economic evaluations have already diminished the extent of identified effects. Consequently, the cumulative assessment inherits this reduced baseline, leading to an underestimation of the total impact when considering this proposal alongside other existing, consented, and foreseeable developments. This fundamental flaw undermines the credibility of the cumulative effects conclusions and calls into question the sufficiency of the mitigation measures proposed.

Failure to adequately assess the cumulative and in-combination effects of the proposed development, including deferred works, risks non-compliance with

essential planning policies and environmental regulations. Specifically, the proposal does not satisfy the requirements set out in GEN 21 and paragraph 4.85 of the National Marine Plan, nor does it adhere to NPF4 Policy 11(e) and the Environmental Impact Assessment (EIA) Regulations concerning project splitting. The applicant has not demonstrated that the full scope of effects associated with the project as a whole has been reliably identified and assessed. Consequently, it is imperative that the determination explicitly addresses the treatment of the deferred works to ensure compliance and a robust decision-making process.

1.1.267 Public Engagement, Site Selection and Environmental Information

While the applicant requests that Scottish Ministers place significant weight on the site-selection process, it is essential to consider the shortcomings in public participation that undermine its legitimacy. The consultation period coincided with the busiest months for island communities, when residents are occupied with continuous work throughout the visitor season and access to specialist advice is limited. This timing contrasts sharply with the applicant's extended preparation period, which has benefited from substantial professional and financial resources. Consequently, the affected communities have not been afforded a comparable opportunity to engage meaningfully with the extensive technical material submitted, which runs to many thousands of pages.

The principles enshrined in GEN 18 of the National Marine Plan, alongside those of the Aarhus Convention, explicitly require that affected parties have a realistic chance to participate in decisions of this significance. The conditions under which communities have been expected to respond clearly fall short of this standard. It is therefore imperative that Ministers take these deficiencies in public participation seriously when considering the representations made, recognising that the consultation process as conducted does not meet the required standards of effective engagement.

The practical consequence of the current Environmental Impact Assessment (EIA) is that the Scottish Ministers are unable to make an informed decision on the application due to insufficient environmental information. The EIA is the principal evidential basis for determination, and the critical issue is not the extent of the assessment but its adequacy. The application identifies potential pathways to significant effects across multiple topics but fails to investigate them comprehensively. For example, the landscape assessment produces outcomes based on a distance pattern that is not supported by its own stated methodology; the heritage assessment does not demonstrate the application of its integrity test; and the socio-economic assessment lacks any place-based analysis relevant to the affected islands.

Furthermore, the application relies in certain instances on future assessments, post-consent plans, monitoring, and additional approvals to address environmental effects. However, these measures do not negate the requirement under the EIA Regulations that likely significant effects must be fully understood prior to determination. The regulatory framework clearly mandates that the environmental impacts should be adequately assessed and made available at the time of decision-making, rather than deferred to later stages of the process.

In conclusion, the Scottish Ministers are obliged to determine the application based on the evidence presently before them. The applicant has not demonstrated that the environmental information submitted satisfies this requirement. Without sufficient and robust environmental data, any determination risks being made on an incomplete understanding of likely significant effects, which undermines the statutory purpose of the EIA and the integrity of the decision-making process.

1.1.268 Effects on Local Area

The applicant's assessment significantly underestimates the direct and substantial effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby undermining the reliability of the overall environmental and heritage impact evaluation. Islay and Colonsay, being the closest inhabited islands to the proposed development area—which lies immediately north-west of Islay and west of Colonsay—receive an assessment that is fundamentally flawed. The application primarily considers Islay only in terms of its potential as a direct project location, rather than recognising it as an affected island community with distinct social and economic characteristics. Notably, the Atlantic-facing communities of Islay confront the nearest edge of a 448 square kilometre development zone, yet there is no place-based analysis of how this proximity would influence their setting, economy, or community life.

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

While the applicant's assessment acknowledges certain visual and community impacts on Iona, it nonetheless underestimates their scale and significance, particularly when compared to the mitigation measures proposed. The Coastal Character assessment attributes a High sensitivity to the Sound of Iona, noting its direct orientation towards the development and extensive visibility across a large geographical extent. The turbines would be visible over approximately 21 kilometres, spanning around 39 degrees of the horizon, producing an effect described as Moderate and Significant. Despite this, the proposed mitigation does not adequately address the pervasive visual intrusion experienced from key locations, including the ferry crossing between Fionnphort and Iona, which forms a vital arrival point and is integral to the island's sense of place.

The West Coast of Iona is similarly assessed as highly sensitive with widespread visibility, and the applicant accepts that significant effects will be experienced by residents and visitors across much of the island, including at Dùn Ì, its highest point. However, the evaluation falls short in capturing the full cultural and heritage

significance of Iona's monastic landscape, which includes the Abbey, the Nunnery and the high crosses. This heritage is of international importance, with its significance intrinsically linked to pilgrimage, arrival by sea, and movement through the landscape, as identified in the applicant's own baseline studies. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet notably, no visualisation has been provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, leaving a critical gap in the assessment of visual impact on this internationally important heritage setting.

Furthermore, the social impact assessment appears incomplete, particularly in relation to the community on Iona itself. A household consultation revealed that 92 per cent of respondents object to the proposal, reflecting widespread local concern. The applicant's own consultants identify habitability as a potential pathway of effect on this community, yet this important consideration was never fully assessed. To contextualise the scale of the visual impact, the largest turbines would surpass the height of Ben Hynish on Tiree, a well-known landmark standing at 141 metres and visible from Iona at approximately 33 kilometres; the turbines would be approximately 194 metres tall and at roughly two-thirds of that distance. This comparison underscores the considerable and underappreciated magnitude of the proposed development's visual presence, which is likely to exacerbate the adverse effects on both the community and the heritage value of Iona.

The applicant's assessment notably relies on distance-based mitigation in addressing the visual impacts on Mull and Ross of Mull coastal communities and landscapes, yet this approach inadequately reflects the true extent of significant effects experienced locally. For instance, although the Ross of Mull South coastal area is acknowledged as having High sensitivity at distances of approximately 22 to 24 kilometres and is attributed Medium magnitude effects, the applicant concedes significant impacts at Erraid, on the Core Paths of the Ross, and at Fionnphort—the key gateway to Iona and the principal embarkation point for visitors. This community is intrinsically linked to visitor flows, yet the assessment does not extend to a place-based evaluation of its social and economic vulnerabilities. Similarly, across Mull, significant effects are accepted on Core Paths and within the Central, South and West Mull Local Landscape Area, and the Loch na Keal National Scenic Area, which is of High sensitivity between 21 and 33 kilometres, is nonetheless attributed no more than Medium magnitude. The applicant's characterisation of the Wilderness and Gribun Rocks area, where the scale of change is deemed small due to viewing distances exceeding 30 kilometres, further exemplifies an over-reliance on distance as a mitigating factor rather than a nuanced, site-specific analysis.

This distance-centric assessment framework fails to capture the profound implications for Mull's west-facing tourism economy, which is heavily reliant on the unspoiled Atlantic seascape that the proposed development would fundamentally industrialise. The wildlife boat operations and accommodation sectors supporting the western townships are intimately connected to this landscape quality, yet no dedicated place-based assessments have been conducted for these communities. The absence of such evaluations undermines the understanding of the cumulative and localized economic and community impacts that would arise. In summary, the applicant's assessment inadequately accounts for the significance of visual, economic, and community effects on highly sensitive landscapes and tourism-

dependent populations, thereby failing to provide a comprehensive or balanced appraisal of the proposal's true consequences for Mull and Ross of Mull.

The applicant's assessment acknowledges potential effects on several designated landscapes within the wider seaboard area, including Ulva, Staffa, Jura, and the Scarba, Lunga and the Garvellachs National Scenic Areas. Ulva, situated within the Loch na Keal National Scenic Area, is identified as experiencing the full range of effects noted for that landscape. Importantly, Ulva is a community-owned island undergoing a process of regeneration, with a small re-establishing population whose future depends heavily on the preservation of the island's setting and unspoilt seascape qualities. Despite this, no specific assessment has been made regarding the impact on Ulva's community and its recovery, which raises concerns about the adequacy of the applicant's evaluation.

Staffa, also within the Loch na Keal National Scenic Area and renowned as one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development site. This distance exceeds the roughly 30 kilometres that NatureScot requested for assessment of effects on National Scenic Area qualities. The applicant concludes that the scale of change at Staffa would be small and the effect not significant, even though their own assessment recognises the island's panoramic maritime qualities. This conclusion suggests a potential underestimation of the significance of impacts on such a valued and sensitive landscape.

The Jura National Scenic Area, located between approximately 28 to 32 kilometres from the development, is assessed by the applicant as having high sensitivity but is attributed no greater than medium to low magnitude of impact. This moderation is justified by factors such as distance, the apparent scale of development, and the retention of landforms, despite the designation's reliance on the wild and undeveloped character of Jura's Atlantic outlook. A similar approach is taken for the Scarba, Lunga and the Garvellachs National Scenic Area at around 35 to 40 kilometres, where effects are also considered limited. Taken together, these assessments indicate a tendency to downplay the potential effects on the distinctive qualities of these important seaboard landscapes and the vulnerable island communities they support, thereby undermining the protection of their natural and cultural values.

The applicant's assessment recognises the South Tiree coastal area as having High sensitivity at a distance of approximately 35 kilometres but assigns a Low magnitude of change to the proposed development. This evaluation, however, significantly understates the true magnitude of impact on Tiree's distinctive landscape character. Tiree is an exceptionally low-lying island, with its highest point, Ben Hynish, rising to only 141 metres, and its landscape defined by the expansive dominance of sea and sky. The introduction of turbines up to 335 metres in height would create vertical structures unprecedented within this open oceanic horizon. Such large-scale additions would markedly alter the seascape, contradicting the applicant's conclusion of Low magnitude change. Given the exposed and sensitive nature of this receptor, the assessment's low magnitude finding is an unreliable evaluation that fails to adequately reflect the substantial and intrusive visual effects on Tiree's unique coastal environment.

The applicant’s assessment notably omits consideration of significant effects on several mainland and island communities that have direct views of, and economic reliance upon, the seascape within the development’s vicinity. For example, Gigha, a community-owned island whose acquisition by its residents has become emblematic of island regeneration, faces the development waters from the east. The potential impacts on Gigha’s finely balanced community and economy have not been examined, leaving a gap in the assessment’s comprehensiveness.

Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the type of receptors affected by the distance-based moderation approach critiqued in this objection. The failure to assess effects on this important coastal vantage point undermines the robustness of the applicant’s evaluation.

Moreover, the west coast of Kintyre encompasses a series of communities whose outlook, character, and visitor economy are closely tied to the open Atlantic seaboard facing Islay, Jura, and the surrounding waters. The Treshnish Isles, along with other small islands and mainland coasts with views toward the development area, share a similar exposure. The absence of any assessment of impacts on these interconnected communities and seascapes further compromises the completeness of the applicant’s environmental considerations.

The applicant’s environmental impact assessment employs a distance-based methodology that systematically moderates the magnitude of change and discounts the significance of effects on sensitive receptors located beyond approximately 20 kilometres. This approach is evident in the treatment of numerous highly sensitive locations, where the assessment reduces the perceived impact with increasing distance, effectively diminishing the weight given to changes experienced by these receptors. As a result, the assessment fails to provide a comprehensive, place-based analysis for the communities residing beyond this threshold, who nonetheless endure the consequences of the proposed development.

This systematic moderation and discounting undermine the integrity of the environmental impact assessment by neglecting the real and potentially significant effects on distant but sensitive receptors. The absence of detailed, location-specific evaluation for these communities means that their experiences and the full extent of environmental change are neither adequately recognised nor addressed. Consequently, the assessment’s reliance on a rigid distance metric results in an incomplete understanding of impacts, potentially compromising the robustness and fairness of the decision-making process.

1.1.269 Further Comments

I am a resident in Scotland. Mull and Iona, and surrounding area are outstanding environments of natural beauty. Islands that I imagine rely heavily on tourist revenue. This development appears to disregard the potential to impact the natural marine and sea bird ecosystems, the impact on tourism, the impact to local communities. It is not at all clear how this project would benefit local communities or Scotland. Long term consequences of using this site do not seem to have been considered.

1.1.270 Summary

The proposal before the Scottish Ministers fails to demonstrate compliance with the statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges significant impacts upon nationally designated landscapes, as well as on the heritage and communities of the coastal area. Furthermore, published analyses of the applicant's documentation reveal an understatement of the magnitude of these impacts and highlight the omission of a necessary heritage assessment. In addition, while the effects on the island communities involved were identified, no assessment of these impacts has been undertaken. Ecological criteria have not been conclusively shown to be satisfied, and it should be noted that only a portion of the project is currently submitted for ministerial consideration.

In light of these deficiencies, it is respectfully urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm proposal and decline the associated marine licence. Should the Ministers consider granting consent, it is requested that they require the submission of additional environmental information and enhanced visual representations. Moreover, it is recommended that the applications be determined only following a public inquiry, thereby allowing for a thorough examination of the issues raised in this objection. Regardless of the final decision, it is further requested that the Ministers explicitly address the impacts on cultural heritage and affected island communities within their stated reasons.

Yours faithfully,

[Redacted]

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

Member of the public 529
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, as detailed in applications 00012385 and 00012386. These applications, lodged by MachairWind Limited (ScottishPower Renewables), seek approval under section 36 of the Electricity Act 1989 and a marine licence under Part 4 of the Marine (Scotland) Act 2010. I request that this correspondence be recorded as an official objection, that I am registered accordingly, and that I receive notification of the final determination regarding these applications.

The proposals involve the construction of an offshore wind farm with a generating capacity of approximately 2 gigawatts. This development would consist of between 91 and 144 turbines, each reaching up to 335 metres to blade tip. The site covers around 448 square kilometres of marine area situated north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in proximity to the islands and coastal communities of the southern Hebrides.

My objection is grounded in both planning and environmental considerations, evaluated within the statutory and policy frameworks applicable to these applications. It is important to emphasise that the onus lies entirely with the applicant to provide compelling, sufficient evidence to meet the relevant statutory tests. Objectors are not obliged to demonstrate the contrary. In this instance, the applicant has failed to discharge that burden. Consequently, for the reasons elaborated below, I submit that consent should be refused.

1.1.271 Seascape, Landscape and Visual Effects

While mitigation measures may seek to minimise the visual impact of the proposed development during daylight hours, they cannot address the fundamental alteration introduced by the required aviation and navigation lighting. The existing night-time seascape benefits from an absence of artificial illumination, presenting a naturally dark horizon that contributes significantly to its character. The installation of lighting for safety and operational compliance would permanently change this character throughout the 35-year operational life of the development, creating a new and continuous source of brightness that is currently absent.

Furthermore, the temporal limitation of 35 years does not diminish the policy implications of this harm. Granting consent for this development effectively endorses the suitability of this seascape for wind farm use, including the acceptance of its altered night-time character. This sets a precedent that may undermine the protection of seascape qualities valued in planning policy. Therefore, the impact of lighting on the night-time seascape character must be given substantial weight in the decision-making process, recognising that mitigation cannot fully preserve the existing environmental and visual qualities of the site.

1.1.272 Cultural Landscape, Archaeology and Historic Environment

The applicant’s baseline assessment acknowledges that the cultural significance of the heritage assets in question arises from a combination of factors, including

pilgrimage, arrival by sea, movement through an active cultural landscape, and the interrelationships between monuments, spirituality, and the encompassing landscape and seascape. Importantly, these qualities are experienced dynamically through movement rather than from static viewpoints. Despite this recognition, Historic Environment Scotland's consultation responses, as recorded within the application, have highlighted the need for additional viewpoints to ensure these broader experiential and cultural landscape qualities are adequately captured and represented. This suggests that the current assessment may not fully encompass the depth of the heritage assets' cultural significance, potentially leading to an incomplete understanding of the impacts. Therefore, it is essential that the evaluation of heritage effects incorporates these wider landscape and experiential factors to inform a more comprehensive and appropriate heritage impact assessment.

1.1.273 Effects on Island Communities, Tourism and the Local Economy

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

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

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

1.1.274 Effects on Local Area

The applicant's assessment notably underestimates the scale and significance of the visual, community, and heritage impacts on Iona, resulting in an incomplete evaluation of environmental and social effects that cannot be adequately mitigated. The Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity, with direct orientation towards the development and extensive visibility across a large geographical extent. The overall effect is described as moderate and significant, with turbines visible over approximately 21 kilometres, spanning around 39 degrees of the horizon, including impacts on the ferry crossing between Fionnphort and Iona. Similarly, the West Coast of Iona is assessed as highly

sensitive with widespread visibility; the applicant acknowledges significant effects on residents and visitors throughout much of the island, including at Dùn Ì, its highest point.

Crucially, Iona's monastic landscape—which encompasses the Abbey, the Nunnery, and the high crosses—is of international heritage importance. Its significance is closely tied to pilgrimage, arrival by sea, and movement through the landscape, as established in the applicant's own baseline studies. Historic Environment Scotland requested additional viewpoints from sensitive locations, including the ferry crossing itself; however, the applicant failed to provide visualisations from elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, leaving a critical gap in understanding the full visual impact on this heritage setting. Furthermore, a household consultation on Iona revealed that 92 per cent of respondents object to the proposal, yet the applicant's consultants did not assess habitability—a potential pathway of effect on the community identified in their own reports.

The perceived scale of the turbines can be contextualised by comparison with a familiar local landmark: Ben Hynish on Tiree stands at 141 metres and is visible from Iona at approximately 33 kilometres. The proposed turbines would exceed Ben Hynish by about 194 metres in height, despite being situated at roughly two-thirds of that distance, thus dominating the skyline to a far greater extent than existing landmarks. Taken together, these factors demonstrate that the applicant's assessment fails to capture the true magnitude of impacts on Iona's visual environment, community well-being, and internationally important heritage assets. As such, the assessment lacks the necessary accuracy and comprehensiveness to inform appropriate mitigation or decision-making.

The applicant's assessment acknowledges significant effects on the Ross of Mull South coastal area, which is recognised as having high sensitivity at distances of approximately 22 to 24 kilometres and is assigned a medium magnitude of impact. Notably, the applicant accepts that significant effects would occur at Erraid and along the Core Paths of the Ross, with Fionnphort—the gateway to Iona and the embarkation point for visitors—being the community most directly connected to the flow of visitors whose experience would be significantly affected. This admission underscores the potential for considerable impacts on local communities closely linked to tourism and visitor movements.

Similarly, across Mull as a whole, the applicant accepts significant effects on Core Paths and within the Central, South and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is assessed as having high sensitivity throughout at distances ranging from approximately 21 to 33 kilometres, yet the applicant attributes no more than a medium magnitude of impact. This appears to understate the potential effects on such a nationally recognised landscape, given its acknowledged sensitivity and the importance placed upon it.

Further illustrating the limitations of the assessment is the treatment of the Wilderness and Gribun Rocks coastal area, where the applicant judges the scale of change to be small based primarily on the viewing distance of over 30 kilometres. This reliance on distance-based criteria tends to diminish the perceived significance

of the impact, despite the industrialisation of the Atlantic seascape that supports Mull's west-facing tourism economy, wildlife boat operations, and the accommodation of western townships. Crucially, none of these communities have been subject to place-based assessment, leaving a gap in understanding the full extent of visual, economic, and community effects on these tourism-dependent areas.

The applicant's assessment fails to adequately recognise significant impacts on important designated landscapes and vulnerable island communities, thereby undermining the protection of their natural and cultural qualities. Ulva, situated within the Loch na Keal National Scenic Area, is a community-owned island undergoing regeneration. This small, re-establishing community relies fundamentally on the unspoilt seascape and setting that the development threatens, yet no specific assessment of effects on Ulva has been undertaken. Similarly, Staffa, also within the Loch na Keal National Scenic Area and renowned across Europe, lies approximately 35 kilometres from the development. Despite NatureScot's recommendation to assess effects up to 30 kilometres, the applicant dismisses the impact on Staffa as small and not significant, even though their own analysis acknowledges its panoramic maritime qualities. The Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed at a High sensitivity level from 28 to 32 kilometres distance but is attributed only Medium to Low magnitude effects due to distance and retained landforms, a conclusion that appears to downplay the importance of its defining characteristics. The Scarba, Lunga and the Garvellachs National Scenic Area, located between 35 and 40 kilometres away, is treated similarly. Collectively, these assessments underestimate or omit meaningful effects on designated landscapes and island communities, risking harm to their essential qualities and the viability of fragile local populations.

There remains considerable uncertainty regarding the applicant's conclusion that the South Tiree coastal area, despite being assessed as of High sensitivity at a distance of approximately 35 kilometres, would only experience a Low magnitude of change. This evaluation appears to underestimate the true scale of impact, given the distinctive qualities of Tiree's landscape and seascape. The assessment does not fully reconcile the sensitivity attributed to the receptor with the nature and scale of the proposed development, raising doubts about the reliability of the reported magnitude of change.

Tiree's exceptional landscape character is intrinsically shaped by its exceptionally low-lying topography, where the dominance of sea and sky is a defining feature. With its highest point, Ben Hynish, reaching only 141 metres, the island's open oceanic horizon is largely uninterrupted by vertical features. The introduction of turbines rising up to 335 metres would represent vertical structures of unprecedented scale within this sensitive seascape. To conclude a Low magnitude of change for such a prominent and exposed receptor does not adequately reflect the visual and experiential effects likely to arise. This significant understatement undermines confidence in the assessment's conclusions and warrants a more cautious and thorough evaluation.

1.1.275 Personal Observations

Finally, I would also ask the Scottish Ministers to consider: Iona is a place of such historical and personal importance to so many people around the Globe. This is in part because it has changed little visually since Columba. This application, if successful, would break that link.

1.1.276 Summary

The proposal before the Scottish Ministers fails to demonstrate compliance with the statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges significant impacts upon nationally designated landscapes, as well as on the heritage and communities of the coastal area. Furthermore, published analyses of the applicant's documentation reveal an understatement of the magnitude of these impacts and highlight the omission of a necessary heritage assessment. In addition, while the effects on the island communities involved were identified, no assessment of these impacts has been undertaken. Ecological criteria have not been conclusively shown to be satisfied, and it should be noted that only a portion of the project is currently submitted for ministerial consideration.

In light of these deficiencies, it is respectfully urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm proposal and decline the associated marine licence. Should the Ministers consider granting consent, it is requested that they require the submission of additional environmental information and enhanced visual representations. Moreover, it is recommended that the applications be determined only following a public inquiry, thereby allowing for a thorough examination of the issues raised in this objection. Regardless of the final decision, it is further requested that the Ministers explicitly address the impacts on cultural heritage and affected island communities within their stated reasons.

Yours faithfully,

[Redacted]

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

Member of the public 530
Dear Sir/Madam,

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

The development in question involves an offshore wind farm with an installed capacity of approximately 2 gigawatts. It comprises between 91 and 144 wind turbines, each reaching up to 335 metres to the blade tip. This array is proposed within a designated Windfarm Development Area spanning roughly 448 square kilometres of marine environment situated to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona. The site's proximity to the southern Hebridean islands and adjacent coastal communities raises significant considerations.

The grounds for objection are founded upon planning and environmental concerns, considered against the applicable statutory and policy frameworks governing these proposals. It remains incumbent upon the applicant to provide adequate and compelling evidence that all relevant statutory tests and policy requirements have been met. The role of objectors is not to establish the contrary but to highlight where the applicant's submissions fall short. On reviewing the evidence presented, it is clear that the applicant has failed to satisfy this evidential burden. Consequently, in accordance with the planning and licensing statutes, the applications ought to be refused consent.

1.1.277 Seascape, Landscape and Visual Effects

The introduction of aviation and navigation lighting associated with the proposed development would permanently alter the night-time character of the currently unlit sea horizon for the entire 35-year operational period. This change is not merely a temporary effect limited to the lifespan of the development; rather, consenting to this proposal effectively acknowledges that the seascape is appropriate for wind farm use, with all attendant visual and environmental implications. Such a decision sets a precedent for the acceptability of lighting impacts in this sensitive seascape, fundamentally changing its character in a manner that should be carefully weighed against relevant policy considerations.

1.1.278 Cultural Landscape, Archaeology and Historic Environment

The practical consequence of the applicant's current heritage assessment is that it risks underrepresenting the full extent of cultural impacts arising from the proposed development. This is because the baseline acknowledges that the affected heritage assets derive their significance not only from static features but from experiential qualities such as pilgrimage routes, arrival by sea, and movement through a living

cultural landscape. The relationships between monuments, the sense of spirituality, and the connection to the surrounding landscape and seascape are integral to understanding the heritage value, and these qualities are experienced dynamically rather than from fixed viewpoints.

The applicant's methodology, however, appears to rely predominantly on conventional fixed viewpoints, which may fail to capture this broader cultural landscape and the sequential experience of the heritage assets. This limitation was highlighted by Historic Environment Scotland in their consultation responses, which are recorded within the application documentation. They specifically requested additional viewpoints to ensure that the wider experiential qualities and the interconnectedness of the heritage assets are properly represented in the assessment process.

In light of this, it is essential that the heritage impact assessment is expanded to incorporate these broader cultural and experiential dimensions. Without this, the assessment cannot fully inform decision-makers of the potential harm to the cultural significance that derives from movement and relationships within the landscape, thereby compromising the ability to appropriately mitigate or avoid adverse effects. A more comprehensive approach would better safeguard the holistic heritage values identified in the baseline and ensure the planning process respects the full character of the affected assets.

1.1.279 Effects on Island Communities, Tourism and the Local Economy

The proposal poses a serious threat to the fundamental economic and social sustainability of the island communities concerned. These communities rely to an exceptional degree on visitors, whose arrival is motivated precisely by the qualities identified in the applicant's own baseline assessments: the landscape, seascape, cultural heritage, tranquillity, and remoteness of the area. Any changes to these defining characteristics would directly undermine the economic base of these communities. This economic harm would, in turn, affect essential local services, reduce population retention and growth, and jeopardise the ongoing viability of the communities themselves. In light of these factors, the proposal should be viewed as incompatible with the long-term sustainability of the island communities it would impact.

1.1.280 Ecology, Biodiversity and Habitats Regulations

The development area and its surrounding waters are of considerable ecological importance, containing Priority Marine Features and Annex I habitats within the site itself. This environment also supports a range of protected species, including seabirds, marine mammals and the basking shark, all of which are sensitive to disturbance.

The proposed development would introduce extensive construction, operational and decommissioning activities on a very large scale, persisting for decades. Such prolonged and intensive activity poses a significant risk of adverse environmental effects on these important marine features and protected species, warranting careful and thorough consideration.

The applicant's submission of a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan signals recognition of potential adverse impacts on the North Colonsay and Western Cliffs Special Protection Area, specifically concerning the guillemot population. Such documents are customarily prepared in circumstances where the integrity of a protected site cannot be confidently assured, indicating that the applicant does not rule out the possibility of an adverse effect. Moreover, the inclusion of these plans acknowledges that Scottish Ministers may reach a different conclusion regarding impacts on site integrity than the applicant. This submission is therefore a critical element of the application, intended to address potential adverse effects through derogation provisions and compensation measures, albeit without definitive assurance that such impacts can be fully avoided.

1.1.281 Cumulative and In-Combination Effects

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

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

The cumulative impact assessment is fundamentally unreliable due to its reliance on baseline assessments that understate the true effects. Specifically, the cumulative evaluations depend on conclusions drawn elsewhere in the Environmental Impact Assessment, which, as previously established, present reduced baselines for landscape, heritage, and socio-economic impacts. This inherent flaw means that the combined effects of the proposed development alongside existing, consented, and foreseeable projects are systematically underestimated. Consequently, the assessment fails to provide a robust or accurate appraisal of the cumulative impacts, undermining confidence in its findings and the overall decision-making process.

1.1.282 Effects on Local Area

The applicant's assessment notably underestimates the scale and significance of the visual, community, and heritage impacts on Iona, resulting in an incomplete evaluation of environmental and social effects that cannot be adequately mitigated. The Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity, with direct orientation towards the development and extensive visibility

across a large geographical extent. The overall effect is described as moderate and significant, with turbines visible over approximately 21 kilometres, spanning around 39 degrees of the horizon, including impacts on the ferry crossing between Fionnphort and Iona. Similarly, the West Coast of Iona is assessed as highly sensitive with widespread visibility; the applicant acknowledges significant effects on residents and visitors throughout much of the island, including at Dùn Ì, its highest point.

Crucially, Iona's monastic landscape—which encompasses the Abbey, the Nunnery, and the high crosses—is of international heritage importance. Its significance is closely tied to pilgrimage, arrival by sea, and movement through the landscape, as established in the applicant's own baseline studies. Historic Environment Scotland requested additional viewpoints from sensitive locations, including the ferry crossing itself; however, the applicant failed to provide visualisations from elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, leaving a critical gap in understanding the full visual impact on this heritage setting. Furthermore, a household consultation on Iona revealed that 92 per cent of respondents object to the proposal, yet the applicant's consultants did not assess habitability—a potential pathway of effect on the community identified in their own reports.

The perceived scale of the turbines can be contextualised by comparison with a familiar local landmark: Ben Hynish on Tiree stands at 141 metres and is visible from Iona at approximately 33 kilometres. The proposed turbines would exceed Ben Hynish by about 194 metres in height, despite being situated at roughly two-thirds of that distance, thus dominating the skyline to a far greater extent than existing landmarks. Taken together, these factors demonstrate that the applicant's assessment fails to capture the true magnitude of impacts on Iona's visual environment, community well-being, and internationally important heritage assets. As such, the assessment lacks the necessary accuracy and comprehensiveness to inform appropriate mitigation or decision-making.

The applicant's assessment acknowledges significant effects on certain locations within Mull and the Ross of Mull, such as Erraid, the Core Paths of the Ross, and Fionnphort—the latter being a critical community directly linked to the flow of visitors to Iona. Similarly, significant effects are accepted on Core Paths and within the Central, South and West Mull Local Landscape Area, with the Loch na Keal National Scenic Area consistently recognised as having high sensitivity over distances of approximately 21 to 33 kilometres, yet only attributed a medium magnitude of effect. However, this approach demonstrates a reliance on distance-based reasoning, as exemplified by the treatment of the Wilderness and Gribun Rocks coastal area, where effects are deemed small solely due to viewing distances exceeding 30 kilometres. This methodology underestimates the substantial visual and experiential impacts on communities whose economies are heavily dependent on the western seascape. Notably, Mull's west-facing tourism sector, including wildlife boat operations and accommodation providers, depends fundamentally on the integrity of the Atlantic seascape that the proposed development would industrialise. Crucially, none of these communities has been subject to a place-based assessment reflecting their particular vulnerabilities. In conclusion, the applicant's assessment fails adequately to address the significant visual, economic, and community impacts on

Mull and Ross of Mull’s designated landscapes and tourism-dependent communities, undermining a comprehensive understanding of the proposal’s true effects.

1.1.283 Personal Observations

In addition to the planning matters above, I am personally concerned because: I have long hoped to make a pilgrimage to the Christian heritage sites including Iona. This includes being present to a place that has hundreds of years of spiritual significance marked by stillness and peace, with a profound connection to the surrounding natural world. The scope of the proposed project is an enormous threat to the cultural, spiritual and natural situation of the Hebrides. It is also a threat to the economies of the Islands, dependent as they are on tourism.

Based on my own local knowledge, I also wish to highlight that: The monastic communities on Iona and Mull are threatened with the disruption of their peace. The environmental impact and the danger to wildlife would be enormous with such a large installation. It seems that the company involved has no sense of preservation of anything except its own profit.

Finally, I would also ask the Scottish Ministers to consider: The Scottish Ministers should remember their own culture, history, thin places, landscapes, biomes and local economies, and seek to do good for the people of Scotland, not pander to foreign investment. Build up your own infrastructure, support small renewable energy initiatives that will benefit local economies, and preserve the peace, spirituality, historical character and environment that characterize Scotland. Don't cast aside these invaluable things for the sake of something without any intrinsic *meaning*.

1.1.284 Further Comments

I hope that when I am finally able to visit the holy sites of Christian Scotland I will find in them oases of life and peace in these difficult times. I beg the people of Scotland not to capitulate to the maw of the soulless Machine. Scotland has produced some of the leading lights of western civilization; surely there is enough creativity in its people to take a different road than the path of least resistance.

1.1.285 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the relevant statutory and policy requirements governing its determination. The applicant’s own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal region. Moreover, published critiques of the applicant’s documentation reveal that the scale of these impacts has been underestimated, with a necessary heritage assessment notably absent. Although the effects on the island communities involved were identified, they have not undergone any formal assessment. Additionally, the ecological criteria set out in legislation have not been demonstrated as achievable. It is also of concern that only a portion of the project has been submitted for consideration by the Scottish Ministers.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm, alongside a refusal of the related marine licence. Should the Ministers consider granting consent, I request that they require the submission of further environmental information and enhanced visual representations. Furthermore, I advocate for the applications to be determined only following a public inquiry, thereby ensuring that the issues raised in this objection receive thorough examination. Regardless of the final decision, I request that the Ministers provide explicit conclusions in their determination with respect to the impacts on cultural heritage and the island communities affected.

Yours faithfully,

[Redacted]

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

Member of the public 531
Dear Sir/Madam,

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

This objection is grounded in both planning and environmental considerations, evaluated against the relevant statutory provisions and policy guidance that govern the determination of such applications. It is important to emphasise that the onus lies with the applicant to provide compelling and adequate evidence demonstrating compliance with all applicable legal and policy tests. Objectors, conversely, bear no obligation to prove contrary positions. Upon careful review, it is apparent that the applicant has failed to meet this evidential burden. Consequently, it is my clear position that the applications should not be granted consent.

I request that this correspondence be formally recorded as an objection, that my status as an objector be duly noted, and that I receive notification of the final decision regarding these applications.

1.1.286 Legislative and Policy Framework

The marine licence application before the determining authority is subject to the statutory framework established by Part 4 of the Marine (Scotland) Act 2010, which mandates that authorisation decisions must be taken in accordance with Scotland’s National Marine Plan unless relevant considerations indicate otherwise. The National Marine Plan’s General Policies, notably GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts), are integral to the statutory assessment of this application. The applicant’s submission fails to demonstrate compliance with these essential policies, which are designed to ensure that marine developments do not adversely affect the environment, heritage, landscape, and stakeholder interests.

The evidence confirms that where compliance with the National Marine Plan policies has not been demonstrated, or where deficiencies, omissions, or conflicts with the applicable legal and policy framework exist, these factors must weigh against the granting of consent. In this case, the marine licence application exhibits such shortcomings, including a lack of sound evidence as required by GEN 19, insufficient engagement as mandated by GEN 18, and inadequate consideration of cumulative impacts under GEN 21. These failures represent material non-compliance with the

statutory requirements and the National Marine Plan policies, thereby justifying refusal of the marine licence application.

The applicant's submission acknowledges that National Planning Framework 4 (NPF4) is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements, specifically engaging Policies 3 (Biodiversity), 4 (Natural Places), 7 (Historic Assets and Places), and 11 (Energy) as set out in the Framework. However, the proposal fails to demonstrate compliance with these key policies. The evidence provided does not adequately address the protection and enhancement of biodiversity or natural places, nor does it sufficiently safeguard historic assets and places as required by Policies 3, 4, and 7. Furthermore, the application lacks clear evidence of conformity with Policy 11 on Energy, leaving critical aspects of the proposal's environmental impact unsubstantiated.

Where compliance with NPF4 policies has not been demonstrated, or where the evidence identifies deficiencies, omissions, or conflicts with the applicable legal and policy framework, these matters must weigh against the granting of consent. In this case, the absence of demonstrated compliance and the presence of such shortcomings in relation to biodiversity, natural places, historic assets, and energy policy requirements constitute significant grounds for refusal. The proposal's failure to meet the statutory and policy standards set out in NPF4 undermines its acceptability and justifies the objection to the application.

The proposal under consideration fails to meet the fundamental legal requirements set out in both the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations, which mandate that the likely significant environmental effects of any development must be thoroughly identified, assessed, and reported prior to determination. This statutory framework is designed to ensure that decision-makers are fully informed of the environmental consequences before granting consent. In this case, the Environmental Impact Assessment (EIA) submitted does not adequately fulfil these obligations, as it lacks comprehensive identification and assessment of all likely significant effects, thereby undermining the integrity of the decision-making process.

Furthermore, the proposal does not comply with the Habitats Regulations, which require a rigorous assessment of the effects of the development on European protected sites in accordance with the applicable statutory tests. The absence of a complete and robust Habitats Regulations Assessment (HRA) means that the potential impacts on protected habitats and species have not been properly evaluated. This omission is critical because it prevents the necessary legal safeguards from being applied to protect these designated sites, which are afforded the highest level of environmental protection under UK and EU law.

The failure to demonstrate compliance with these statutory requirements constitutes a serious procedural and substantive deficiency. The evidence clearly identifies omissions and conflicts with the applicable legal and policy framework, specifically the lack of a thorough EIA and HRA. These shortcomings are not minor or technical but go to the heart of the statutory regime designed to prevent environmental harm

and ensure sustainable development. As such, these failures weigh decisively against the granting of consent for the proposal.

In conclusion, the proposal's inadequate environmental impact assessment and failure to provide a compliant habitats regulations assessment represent fundamental breaches of the statutory requirements. These deficiencies undermine the lawful determination of the application and justify refusal of consent in accordance with the established legal and policy framework.

The applicant's submission does not demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be considered and given due weight in the decision-making process. This statutory obligation is clear and unambiguous, as set out in the Act itself and reiterated in the supporting evidence (S01). The proposal documentation fails to provide adequate evidence that these interests have been properly identified, assessed, or integrated into the planning considerations.

Furthermore, the absence of a thorough and transparent evaluation of the impacts on island communities constitutes a significant omission. The evidence confirms that where compliance with the Islands (Scotland) Act 2018 has not been demonstrated, or where deficiencies and omissions exist, these shortcomings must weigh against the granting of consent (S01). In this case, the lack of meaningful engagement with or consideration of island community interests represents a material failure in the planning process.

Given these deficiencies, the proposal conflicts with the applicable legal and policy framework established by the Islands (Scotland) Act 2018. The failure to properly consider and weigh the interests of island communities undermines the statutory purpose of the Act and the integrity of the decision-making process. Accordingly, this matter should be afforded significant weight in the determination of the application, and the proposal should not be granted consent on this basis.

The applicant has failed to provide robust, objective, and proportionate evidence demonstrating compliance with all relevant statutory duties, planning policies, and environmental assessment requirements. This failure means that the application does not meet the essential evidential burden necessary to satisfy the legal and policy frameworks governing the proposal.

As a direct consequence, the absence of demonstrated compliance, coupled with identified deficiencies and omissions in the submitted evidence, undermines the legitimacy of the application. These shortcomings represent clear conflicts with the applicable legal and policy requirements that must be addressed before any consent can be considered.

In accordance with established principles, where compliance is not satisfactorily proven, such matters must weigh decisively against the granting of planning permission. Therefore, on the basis of the evidential failings presented, the application should be refused.

1.1.287 Conflict with National Planning Framework 4 and the Development Plan

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

While the proposal aims to address certain environmental concerns, it falls short in comparison to the robust mitigation measures required under National Planning Framework 4 policies that safeguard designated assets. Policy 11 operates in conjunction with Policy 4(c) and 4(d), which specifically protect National Scenic Areas and nationally important landscapes from significant adverse effects on their defining qualities. Additionally, Policy 7 addresses the protection of scheduled monuments and their settings, with sub-policies 7(h), 7(c), and 7(d) providing detailed safeguards for historic assets. Policy 3 further demands stringent biodiversity protections. The proposal does not demonstrate adequate mitigation to align with these comprehensive protections, particularly given the sensitivity of the designated landscapes and heritage assets involved.

In practical terms, the evidence shows that the proposal would cause significant adverse effects on nationally designated landscapes and seascapes, undermining the purpose of these policies. Furthermore, it has not been satisfactorily demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, nor that the interests of island communities would be safeguarded. Crucially, the ecological criteria set out by Policy 3 remain unmet based on the submitted evidence. Taken together, these failings indicate clear conflicts with multiple NPF4 policies intended to protect nationally important landscapes, heritage assets, and biodiversity, thereby justifying refusal in their current form.

The practical consequence of the proposal is that it would cause adverse effects on the landscape, heritage, and community interests that the Argyll and Bute Local Development Plan 2 seeks to protect. These impacts are directly relevant to the terrestrial environment and the land-based experiences of residents and visitors alike.

Such effects represent a clear conflict with the policies set out in the Local Development Plan, which forms part of the statutory development plan framework for the area. Given the nature of these adverse impacts, the proposal does not align with the overarching objectives to safeguard the character and value of the local environment.

In addition, the proposal is also inconsistent with National Planning Framework 4 when considered in its entirety. The applicant has not provided sufficient evidence to demonstrate otherwise, leaving the proposal fundamentally at odds with both local and national planning policy frameworks.

1.1.288 Seascape, Landscape and Visual Effects

The applicant's methodology as set out in Appendix 16.1 notably lacks a defined distance threshold beyond which major effects are considered to cease. However, an independent Evidence Note, prepared to support community objections and drawing solely from the applicant's Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern across all three assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of that receptor's sensitivity or the extent of its visibility. This pattern is further corroborated by the applicant's own documentation, which explicitly acknowledges the influence of distance in its judgements. For example, an assessment of a coastal area situated over 30 kilometres away states that the scale of change is judged to be small given the viewing distance. Moreover, the Landscape Character synthesis delineates magnitude categories with High magnitude assigned within roughly 20 kilometres, Medium between about 20 and 30 kilometres, and Low beyond approximately 30 kilometres for certain landscape types.

This implicit distance moderation has significant implications for the reliability of the assessment outcomes. By systematically reducing magnitude ratings at distances coinciding with the locations of the most sensitive designated landscapes, the methodology inherently understates the inputs to the protective tests required under planning policy. As a result, the conclusions drawn from the assessment do not provide an accurate or dependable description of the effects that the Scottish Ministers are being asked to consent to. Such an approach risks overlooking or downplaying the true extent of landscape and visual impacts on highly sensitive receptors situated beyond the arbitrary distance markers effectively imposed by the applicant's methodology. In light of this, the assessment's reliability is called into question, and greater scrutiny or revision of the distance-related parameters is warranted to ensure robust and transparent evaluation of potential effects.

While mitigation measures are often informed by visual assessments, it is important to recognise the inherent limitations of the visualisation materials employed. The applicant's adherence to NatureScot's visualisation guidance ensures a standardised approach; however, this guidance explicitly acknowledges that printed visualisations cannot fully replicate the scale or immersive experience perceived by a viewer in the field. Consequently, reliance on these materials may understate or distort the actual visual impact of a development.

Furthermore, the wireline drawings included alongside photographic panoramas are not independent tools that correct or enhance the photographic evidence; rather, they are technical renderings subject to the same perceptual constraints as the photographs they accompany. This means that both forms of visualisation share inherent limitations and should be interpreted cautiously when assessing the true visual effects. Given these constraints, decision-makers should consider the

potential discrepancies between visualisation materials and real-world perception when evaluating the visual impact of the proposal.

When considering the potential effects of the proposed development on the night-time seascape character, it is important to weigh the impact of the introduced lighting against existing conditions and any feasible mitigation measures. The 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 throughout the stated 35-year operational life. While mitigation measures may reduce the visual prominence of lighting, the fundamental change to the natural darkness of the seascape cannot be fully negated.

Furthermore, the duration of the development's operational life does not diminish the policy significance of the harm caused. Although the 35-year period is finite, consenting to this development signifies a policy acceptance that this seascape is appropriate for wind farm use. Therefore, the decision carries implications beyond the temporary nature of the lighting, effectively endorsing a new character for the area during that time and potentially setting a precedent for future developments.

In balancing these considerations, the introduction of lighting presents a notable and permanent change to a presently unlit seascape that must be acknowledged within the policy framework. While mitigation can be sought to lessen the visual impact, the fundamental alteration remains, and the decision to approve the development must reflect a careful judgement that this character change is acceptable within the wider planning objectives for the area.

The proposal's acknowledged effects on the landscape and seascape are significant enough to engage multiple policies within the planning framework, specifically NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively aim to safeguard nationally important landscapes and seascapes from adverse impacts, underscoring the importance of rigorous assessment and mitigation measures.

However, the applicant has failed to substantiate that its assessment of these effects aligns with its own stated methodology. This lack of methodological consistency undermines the credibility of the conclusions presented and raises concerns about the accuracy of the predicted scale of impacts. Without clear evidence demonstrating that the assessment complies with established procedures, it is impossible to ascertain whether the proposal adequately addresses the relevant policy requirements.

In light of these deficiencies, the proposal does not meet the necessary standards set out in the planning policies designed to protect nationally important landscape and seascape interests. Consequently, the application should be refused on the grounds of non-compliance with the relevant statutory planning policies, ensuring that these valued environmental assets are properly conserved.

1.1.289 Cultural Landscape, Archaeology and Historic Environment

The practical consequence of the applicant's assessment approach is a significant uncertainty regarding the true impact of the proposals on the setting of historic assets. Although the applicant states that they have applied Historic Environment Scotland's recognised methodology, the essential evaluative process required to determine whether the integrity of setting is maintained has not been demonstrated. Without this key step, the conclusions drawn about heritage impacts lack the necessary evidential foundation and cannot be relied upon with confidence.

Historic Environment Scotland's methodology, developed through extensive consultation, explicitly requires an assessment that goes beyond mere description of visual changes. It mandates a focused evaluation of how any changes affect the contribution that setting makes to the cultural significance of the heritage assets, with particular attention to whether the integrity of that setting is adequately retained. The methodology also clarifies that visual change alone should not be equated directly with adverse impact, emphasising the need for a nuanced and reasoned judgement.

However, a detailed Methodological Audit, which reviewed the applicant's own Appendix 14.3, found that the assessment primarily describes factors such as visibility, distance, and screening, before making an unsubstantiated conclusion that the integrity of setting remains intact. This audit highlights that the crucial evaluative step prescribed by the methodology is absent from the applicant's assessment and its worked examples. Consequently, the reliability of the assessment's conclusions is fundamentally undermined, and the heritage impacts remain insufficiently justified.

The applicant's assessment acknowledges that the cultural significance of the heritage assets in question is not solely derived from their physical presence but from a complex set of experiential qualities. These include elements such as pilgrimage routes, arrival by sea, the sense of movement through a living cultural landscape, and the interrelationships between monuments, spirituality, and the encompassing landscape and seascape. Notably, these attributes are experienced dynamically through movement rather than static viewpoints, a factor that the applicant recognises in their baseline recording.

However, despite this recognition, the mitigation measures proposed appear insufficient to fully capture or preserve these broader cultural and experiential qualities. Historic Environment Scotland's consultation responses, as documented within the application, explicitly requested additional viewpoints to ensure that the assessment would adequately represent these wider landscape and seascape attributes. The absence of such comprehensive visual and experiential analysis potentially undermines the understanding of the heritage assets' significance and the effectiveness of the proposed mitigation. Consequently, there is a concern that the current assessment underrepresents the full cultural context and may not sufficiently safeguard the intangible qualities that contribute to the heritage assets' value.

The landscape assessment forms the foundation upon which the heritage impact conclusions are drawn. When the landscape effects are understated, as has been demonstrated, any heritage conclusions that rely on that assessment inevitably adopt the same understatement. This interdependence calls into question the robustness of the heritage conclusions presented.

Given the reliance of heritage assessments on the landscape evaluation, it is essential that the landscape effects are accurately and comprehensively appraised. Failure to do so undermines the credibility of the heritage conclusions and suggests that the overall impact may be more significant than acknowledged. Consequently, the heritage impact conclusions should be re-examined in light of a more thorough and transparent landscape assessment.

The application fails to demonstrate adequate mitigation measures to protect the cultural significance of internationally and nationally important heritage assets and their settings. Unlike the requirements set out in NPF4 Policy 7(h) concerning scheduled monuments, and Policies 7(c) and 7(d) which address setting, the applicant has not provided the necessary assessment to show that these assets would be safeguarded. This omission is significant given the stringent expectations established by these policies, as well as by GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan, which collectively emphasise the imperative of heritage protection.

Consequently, the Scottish Ministers do not have before them the comprehensive evidence or assessment that would be required to conclude that the proposal complies with the relevant policy framework. Without such demonstration, the application fails to meet key statutory requirements designed to ensure the protection of heritage assets. This shortfall fundamentally undermines the acceptability of the proposal, as the preservation of cultural heritage is a material consideration that must be satisfied before consent can be granted.

1.1.290 Effects on Island Communities, Tourism and the Local Economy

The proposal poses a direct threat to the fundamental economic and social sustainability of the island communities, which depend to an exceptional degree on visitors. These visitors are attracted by precisely those qualities—landscape, seascape, cultural heritage, tranquillity, and remoteness—that the applicant's own baseline assessments identify. Any changes to these qualities would undermine the economic base of these communities, with consequential impacts on local services, population stability, and their long-term viability.

The applicant's own consultants acknowledge habitability as a potentially significant pathway through which the proposal could impact island communities, yet no assessment of the habitability of these affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 operates at a regional scale, focusing in detail on potential port communities while failing to provide an equivalent place-based analysis of the island communities directly facing the development. Despite this absence, the assessment concludes that these island communities exhibit low sensitivity to tourism effects.

This approach is fundamentally flawed, as small island economies are not accurately represented by regional averages. Their economies are highly concentrated in sectors most vulnerable to changes in the qualities that attract visitors. Moreover, reliance on increasing visitor numbers amplifies rather than mitigates this sensitivity, deepening economic dependence on the very attributes at risk. Therefore, the

conclusion of low sensitivity, reached without any place-based analysis, lacks evidential basis and amounts to an unfounded assumption.

The proposal fails to meet essential planning and statutory requirements for assessing and protecting island communities, which raises significant concerns about its suitability. Without a thorough understanding of the potential impacts on these communities, there is a practical risk that adverse socio-economic consequences may arise, undermining the sustainability and well-being of island populations.

This shortfall directly contravenes established policy and statutory duties. Specifically, the proposal engages provisions set out in GEN 19 and paragraph 4.81 of the National Marine Plan, both of which mandate that decisions be founded on robust socio-economic evidence and adopt a precautionary approach where such evidence is insufficient. Additionally, the requirements of NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 are clear in demanding that the interests of island communities be assessed comprehensively and given substantial weight through meaningful engagement from the earliest stages to project completion.

The applicant acknowledged the need for particular scrutiny of island communities yet failed to carry out the necessary assessments to understand fully how the proposal might affect them. Consequently, it has not demonstrated compatibility with the principles of sustainable island communities, nor has it shown that the statutory duties owed to these communities have been fulfilled. This represents a significant deficiency that should weigh decisively against the proposal's approval.

1.1.291 Ecology, Biodiversity and Habitats Regulations

The proposed development site and its adjacent waters encompass Priority Marine Features and Annex I habitats, which are ecologically significant. Additionally, the surrounding marine environment supports populations of seabirds, marine mammals, and basking sharks. Introducing large-scale construction, operational activities, and eventual decommissioning over several decades poses a substantial risk of significant adverse environmental impacts to these sensitive ecological resources.

The submission of a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan by the applicant indicates an acknowledgment that the proposed development may have adverse effects on the North Colonsay and Western Cliffs Special Protection Area, specifically concerning the guillemot population. Such documents are typically prepared when it cannot be ruled out that the integrity of a protected site might be compromised. This approach underscores the applicant's recognition that the Scottish Ministers might reach a different conclusion regarding potential adverse effects, thereby necessitating these precautionary measures. The inclusion of these documents is therefore a significant aspect of the application, reflecting the applicant's attempt to address and mitigate possible impacts under the relevant derogation provisions.

Consent for developments impacting protected habitats and species cannot be granted unless it is conclusively demonstrated that the proposal will not adversely affect the integrity of the site. Under the Habitats Regulations, this requires the

competent authority to be satisfied beyond reasonable scientific doubt that there will be no adverse effects, unless the stringent derogation tests are satisfied. The responsibility for providing such unequivocal evidence lies with the applicant. Importantly, proposals for mitigation, compensation, or future monitoring alone are insufficient to meet the statutory requirements. This strict legal framework is reflected in the application of the Habitats Regulations alongside GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of NPF4, which collectively emphasise the necessity of robust, evidence-based assurances before consent may lawfully be granted.

There remains significant uncertainty as to whether the application complies with the statutory requirements designed to safeguard internationally important habitats and species. The evidence submitted, notably the applicant's own derogation documents, clearly indicates that the necessary degree of certainty to satisfy these statutory tests has not been achieved. This failure to demonstrate compliance fundamentally undermines the justification for granting consent, as the legal protections for these ecological features must be upheld without compromise. Consequently, in light of this unresolved doubt, the application should not be approved.

1.1.292 Cumulative and In-Combination Effects

The current application before the Scottish Ministers addresses only a portion of the overall project, notably excluding the export cable corridor and the onshore transmission works, which are essential components without which the wind farm cannot function. Consequently, the environmental and planning effects of the entire development are not assessed collectively; instead, these significant elements are reserved for consideration under separate, subsequent consenting processes following the principal decision. This segmentation results in an incomplete evaluation of the project's full impact at the decision-making stage.

Such an approach conflicts with established legal principles, as emphasised in the Raeshaw Farms case, where the courts affirmed that a project must be appraised in its entirety rather than being fragmented into smaller parts whose individual effects may appear diminished. By deferring key components to later applications, the current assessment method effectively undermines comprehensive scrutiny, compromising the integrity and completeness of the planning process. This procedural flaw renders the present evaluation legally and procedurally unsound.

The practical consequence of relying on the current cumulative impact assessment is that it fails to accurately reflect the true combined effects of the proposed development alongside other existing, consented, and foreseeable projects. This shortcoming arises because the cumulative assessment is fundamentally dependent on the baseline conditions established in the preceding Environmental Impact Assessment. When the initial assessments of landscape, heritage, and socio-economic factors understate the effects—as has been demonstrated—the cumulative assessment consequently adopts these diminished baselines, leading to an overall understatement of the aggregate impacts.

This issue is critical because an inaccurate baseline distorts the starting point from which cumulative effects are measured, thereby undermining the reliability of the

entire assessment. The combined impacts should consider the full extent of existing and future developments to inform sound decision-making. However, by beginning from a reduced baseline, the assessment does not adequately capture the scale and significance of potential adverse effects. It follows that the cumulative impact assessment, as presented, is unreliable and should be revisited to ensure that baseline conditions are accurately represented, thereby providing a more truthful account of the combined effects on the environment and local communities.

The applicant's approach to mitigating environmental impacts is insufficient when compared against the requirements set out in GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the EIA Regulations concerning project splitting. Specifically, there has been a failure to reliably identify and assess the cumulative and in-combination effects of the proposal, including the overall effects of the project as a whole. This omission undermines compliance with both planning policies and environmental regulations. It is therefore essential that the decision-making process explicitly addresses the treatment of deferred works to ensure a comprehensive evaluation of all potential impacts.

1.1.293 Public Engagement, Site Selection and Environmental Information

The applicant requests that Scottish Ministers accord significant weight to the site-selection process; accordingly, the quality of public participation within that process is directly material. Evidence highlights that deficiencies in participation at both the plan and site-selection stages have persisted into the application phase. The application documentation comprises thousands of pages of technical material, and the consultation period coincided with the busiest months for island communities, when residents are engaged continuously through the visitor season and access to specialist advice is limited. In contrast, the applicant has had years to prepare and considerable professional and financial resources to support their case.

Moreover, GEN 18 of the National Marine Plan and the principles of effective public participation enshrined in the Aarhus Convention require that those affected have a realistic opportunity to engage in decisions of such magnitude. The conditions under which the affected communities have been expected to respond fall short of this standard. Therefore, Ministers are urged to bear these shortcomings firmly in mind when weighing the representations made. The inadequacies in both timing and accessibility of consultation undermine the legitimacy of the site-selection process and the broader decision-making framework.

The Environmental Impact Assessment submitted in support of this application falls short in providing a sufficiently robust evidential foundation for the Scottish Ministers to make an informed decision. While the assessment identifies numerous pathways to potentially significant environmental effects, it fails to investigate these comprehensively. Specifically, the landscape assessment relies on conclusions that follow a distance-based pattern not supported by its own stated methodology. Similarly, the heritage assessment does not adequately apply its integrity test, and the socio-economic assessment lacks any place-based analysis of the affected island communities. These deficiencies collectively undermine the reliability of the environmental information presented.

Moreover, the application frequently defers crucial analysis to future stages, including post-consent plans, monitoring programmes, and additional approvals. Such reliance conflicts with the requirements of the EIA Regulations, which mandate that likely significant effects must be fully understood prior to determination. Deferring key assessments to later stages cannot substitute for the thorough, upfront evaluation necessary to ensure that environmental impacts are properly considered before consent is granted. This approach leaves critical uncertainties unresolved at the point of decision-making.

It is therefore essential that the Scottish Ministers base their determination solely on the evidence currently before them, without assuming that outstanding matters will be satisfactorily addressed later. The applicant has not demonstrated that the environmental information submitted is adequate for this purpose. Consequently, the application should not be approved in its present form, as the insufficiency of the Environmental Impact Assessment precludes a fully informed and lawful decision.

1.1.294 Effects on Local Area

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

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

The applicant's Coastal Character assessment recognises the Sound of Iona as an area of high sensitivity, noting its direct orientation towards the proposed development, extensive visibility, and a large geographical extent of change. The assessment quantifies the overall effect as moderate and significant, with visibility extending approximately 21 kilometres and turbines occupying around 39 degrees of

the horizon. This finding is consistent with the high sensitivity attributed to the west coast of Iona, where widespread visibility is similarly acknowledged. The applicant concedes that significant effects will be experienced by residents and visitors across much of the island, including at Dùn Ì, the island's highest point.

Despite these acknowledgements, the assessment falls short in fully capturing the scale and significance of the impacts on Iona's internationally important monastic landscape. The Abbey, the Nunnery, and the high crosses are central to the heritage value of the island, with their significance closely tied to pilgrimage, arrival by sea, and movement through the landscape as established in the applicant's own baseline evidence. Historic Environment Scotland's request for additional viewpoints, including from the ferry crossing between Fionnphort and Iona, was not comprehensively addressed; notably, no visualisation is provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, a location of particular heritage relevance.

Community concerns further underscore the gravity of the potential impacts. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal. The applicant's own consultants identify habitability as a potential pathway of effect on the community, yet this crucial aspect was never assessed, leaving a significant gap in the social impact evaluation. The perceived scale of the development can be further contextualised by comparison with a familiar local landmark: Ben Hynish on Tiree, standing at 141 metres and visible from Iona at approximately 33 kilometres, would be dwarfed by the largest turbines, which would exceed Ben Hynish's height by around 194 metres and be located at roughly two-thirds of that distance.

In summary, while the applicant recognises some significant effects on Iona, the assessment underestimates the extent and importance of visual, community, and heritage impacts. This results in an incomplete and potentially misleading environmental and social impact evaluation, which must be addressed to ensure that the full implications for Iona are properly understood and mitigated.

The applicant's assessment fails to adequately recognise the practical consequences of the proposed development on the coastal communities and landscapes of Mull and the Ross of Mull. Notably, Fionnphort—serving as the gateway to Iona and the embarkation point for visitors—is acknowledged by the applicant as being significantly affected. This community relies heavily on the flow of tourists, and any adverse visual or experiential impact here would have immediate economic repercussions. Similarly, significant effects are accepted at Erraid and along the Core Paths of the Ross, areas integral to both local identity and visitor experience, yet these impacts are not fully explored in terms of their wider community implications.

Across the island of Mull, the applicant concedes significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is categorised as having high sensitivity at distances of approximately 21 to 33 kilometres. Despite this, the applicant attributes only a medium magnitude of effect, which understates the true visual and environmental impact on this nationally

designated landscape. This approach neglects the cumulative significance that such visual intrusions would have in a context recognised for its natural beauty and recreational importance.

Moreover, the assessment's treatment of the Wilderness and Gribun Rocks coastal area exemplifies an overreliance on distance-based reasoning. The applicant dismisses potential effects on this area—where viewing distances exceed 30 kilometres—by classifying the scale of change as small. This simplification ignores the fact that Mull's west-facing tourism economy, including wildlife boat operations and accommodation providers in its western townships, depends fundamentally on the integrity of the Atlantic seascape. The industrialisation of this seascape by the proposed development would harm these communities, none of which have received a place-based assessment to address their specific vulnerabilities. Taken together, these shortcomings indicate that the applicant's evaluation does not sufficiently account for the significant visual, economic, and community impacts on Mull and the Ross of Mull.

The applicant's assessment acknowledges potential effects on designated landscapes within the Loch na Keal National Scenic Area, including Ulva and Staffa, yet these evaluations appear to underestimate or omit significant impacts, particularly on vulnerable island communities and their natural and cultural qualities. Ulva, a community-owned island within this National Scenic Area, is at an early stage of regeneration, characterised by a small, re-establishing population whose recovery is intrinsically linked to the unspoilt seascape and setting that the development threatens. Notably, no specific assessment of effects on Ulva's community or landscape qualities has been provided, leaving a critical gap in understanding the full implications.

Staffa, situated within the same National Scenic Area and renowned as one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development site. This distance exceeds the applicant's own assessment boundary, which extends to around 30 kilometres as advised by NatureScot for evaluating effects on National Scenic Area qualities. Despite recognising Staffa's panoramic maritime qualities, the applicant concludes that changes there would be small and not significant, a position that does not fully account for the island's cultural and environmental importance.

Beyond these, the Jura National Scenic Area, located approximately 28 to 32 kilometres from the development, is assessed with high sensitivity but assigned only medium to low magnitude of impact. This moderation is justified primarily by distance, apparent scale, and retention of landforms, notwithstanding that the area's designation is fundamentally based on its wild, undeveloped Atlantic outlook. Similarly, the Scarba, Lunga, and the Garvellachs National Scenic Area, at distances of approximately 35 to 40 kilometres, receive comparable treatment with limited recognition of potential adverse effects.

Collectively, these considerations indicate that the applicant's assessment does not fully capture the scale or significance of effects on wider seaboard designated landscapes and island communities. The omission of detailed evaluation for Ulva, the constrained assessment boundary excluding Staffa's full context, and the

underestimation of impacts on other National Scenic Areas undermine the protection afforded to their natural and cultural qualities. Consequently, the assessment fails to provide a comprehensive understanding necessary to safeguard these sensitive landscapes and communities.

The applicant's assessment recognises the South Tiree coastal area as having High sensitivity at a distance of approximately 35 kilometres, yet attributes only a Low magnitude of change to the effects of the proposed development. This evaluation appears inconsistent given the acknowledged sensitivity of the receptor and its considerable distance from the site.

Tiree's landscape is uniquely characterised by its exceptionally low-lying topography, with its highest point, Ben Hynish, reaching merely 141 metres. The island's defining features are the expansive sea and sky, presenting an open oceanic horizon. The introduction of turbines up to 335 metres in height would create vertical elements unprecedented in Tiree's seascape. Consequently, the applicant's conclusion of a Low magnitude of change in such an exposed and sensitive environment significantly understates the true extent of the impact, rendering the overall evaluation unreliable.

While the applicant's assessment applies a distance-based moderation to mitigate the visual effects of the proposed development, this approach inadequately addresses the significant impacts on mainland and island communities with direct views and economic dependence on the seascape. The assessment notably omits any examination of Gigha, a community-owned island renowned nationally for its regeneration following purchase by its residents. Facing the development from the east, Gigha's finely balanced community and economy are vulnerable to unassessed effects, undermining the completeness of the applicant's evaluation.

Similarly, Ardnamurchan Point, the most westerly point of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors along the entire peninsula. These seaward panoramas are precisely the receptors for which the applicant's distance-based mitigation is applied, yet the assessment fails to fully consider their sensitivity. The west coast of Kintyre and its chain of communities, whose character and visitor economy are shaped by the open Atlantic seaboard towards Islay, Jura, and adjacent waters, likewise remain unassessed. The Treshnish Isles and other small islands and mainland coasts with views towards the development area share this position, further evidencing a significant gap in the applicant's assessment and calling into question its comprehensiveness and reliability.

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

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

1.1.295 Personal Observations

In addition to the planning matters above, I am personally concerned because: I have enjoyed the sacredness and ecological sanctuary that is Ion over many decades and feel that the proposal will utterly destroy the beauty of Iona

Based on my own local knowledge, I also wish to highlight that: The liminal space between sea and land, the machair is the most enriched environment

Finally, I would also ask the Scottish Ministers to consider: The spiritual capital of Iona is beyond all other considerations

1.1.296 Summary

The proposal under consideration has failed to satisfactorily demonstrate compliance with the relevant statutory and policy frameworks governing its determination. The applicant's own assessments acknowledge significant impacts on nationally designated landscapes, as well as on the cultural heritage and communities along this coastline. However, independent reviews of the submitted documentation reveal that the magnitude of these impacts has been underestimated. Crucially, the necessary heritage assessment has not been completed, and while the adverse effects on the island communities involved were identified, they have never been formally evaluated. Furthermore, the ecological requirements stipulated by law remain unproven as achievable. It is also important to note that only a portion of the overall project is currently before the Scottish Ministers for consideration.

In light of these shortcomings, I respectfully urge the Scottish Ministers to withhold consent for the MachairWind Offshore Wind Farm proposal and to refuse the associated marine licence application. Should the Ministers contemplate granting consent, I request that they first seek additional environmental information and enhanced visualisations. Moreover, I insist that the applications be subject to determination only following a public inquiry, thereby enabling a thorough examination of the concerns raised in this objection. Regardless of the outcome, I further request that the Ministers provide explicit and reasoned conclusions on the impacts to cultural heritage and the affected island communities within their decision statement.

Yours faithfully,

[Redacted]

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

Member of the public 532
Dear Sir/Madam,

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 pursuant to Part 4 of the Marine (Scotland) Act 2010, both lodged by MachairWind Limited, trading as ScottishPower Renewables. I request that this correspondence be recorded as an official representation, that I be registered accordingly as an objector, and that I be informed of the outcomes relating to these applications.

The proposed development involves the installation of an offshore wind farm with an anticipated generating capacity of approximately 2 gigawatts. This would encompass between 91 and 144 wind turbines, each with a maximum height reaching up to 335 metres to blade tip. The designated Windfarm Development Area extends over roughly 448 square kilometres of marine environment situated to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in proximity to the islands and coastal communities within the southern Hebrides.

The following sections articulate the planning and environmental grounds underpinning this objection, framed within the statutory and policy context relevant to the determination of the applications. It is pertinent to emphasise that the applicant bears the onus of proof, tasked with demonstrating through robust evidence that all applicable tests and criteria are met. The role of objectors is not to establish contrary evidence but to challenge the sufficiency of the applicant's submissions. Having examined the proposals in detail, it is clear that the applicant has failed to meet this evidential burden. Consequently, the applications should be refused consent.

1.1.297 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989, which require the applicant to have regard to the desirability of preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant must take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The Scottish Ministers, in determining the application, are similarly required to have regard to these statutory duties.

The evidence confirms that the applicant has not adequately addressed these requirements. There are clear deficiencies and omissions in the application's consideration of the preservation and conservation obligations mandated by Schedule 9. The failure to demonstrate compliance with these statutory duties constitutes a direct conflict with the applicable legal and policy framework. Such shortcomings weigh decisively against the granting of consent for the proposal.

The marine licence application fails to demonstrate compliance with the statutory requirements of the Marine (Scotland) Act 2010 and the relevant policies of Scotland's National Marine Plan, thereby warranting refusal. Under Part 4 of the Marine (Scotland) Act 2010, authorisation decisions must be taken in accordance

with the National Marine Plan unless relevant considerations indicate otherwise. This application has not met that threshold.

Specifically, the application does not adequately address the General Policies critical to the statutory assessment. These include GEN 4 (Co-existence), which requires consideration of the compatibility of marine activities; GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment; GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas; GEN 9 on Natural Heritage; GEN 13 and GEN 18 on Engagement; GEN 19 and paragraph 4.81 on Sound Evidence; and GEN 21 and paragraph 4.85 on Cumulative Impacts. The absence of demonstrated compliance with these policies constitutes a fundamental deficiency.

Moreover, the evidence identifies omissions and conflicts with the applicable legal and policy framework. Where such deficiencies exist and compliance has not been demonstrated, they must weigh against the granting of consent. In this case, the application's failure to provide sufficient evidence or to resolve conflicts with the National Marine Plan policies means it does not satisfy the statutory requirements for marine licence determination under the Marine (Scotland) Act 2010.

Accordingly, the application should be refused on the grounds that it does not comply with the statutory framework and relevant National Marine Plan policies.

The proposal fails to comply with key policies of National Planning Framework 4, specifically Policies 3, 4, 7, and 11, which address biodiversity, natural places, historic assets, and energy. National Planning Framework 4 is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. The submitted evidence does not demonstrate compliance with these policies and instead reveals deficiencies and omissions in meeting the applicable legal and policy framework. Such failures weigh against the granting of consent in this case.

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

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

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

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

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

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

The applicant's submission fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities be considered and given due weight during the decision-making process. This statutory obligation is clear and unambiguous, as set out in the Act and reiterated in the evidence provided (S01).

The proposal does not provide adequate evidence that the interests of the relevant island communities have been properly identified, assessed, or integrated into the planning decision. There are notable deficiencies and omissions in the applicant's consideration of these interests, resulting in a failure to meet the legal and policy framework established by the Islands (Scotland) Act 2018. This failure is material and significant, as the Act explicitly requires that where compliance is not demonstrated, or where evidence reveals shortcomings, these matters must weigh against the granting of consent (S01).

In light of the absence of satisfactory evidence that the proposal has properly considered and given due weight to the interests of island communities, the application is fundamentally flawed. The decision-making process must reflect the statutory duty imposed by the Islands (Scotland) Act 2018, and the failure to do so constitutes a clear basis for refusal. Accordingly, the proposal should be refused consent on the grounds that it conflicts with the statutory requirements to consider and protect the interests of island communities.

The applicant bears the responsibility of demonstrating, through robust, objective and proportionate evidence, that every relevant statutory duty, planning policy and environmental assessment requirement has been satisfied. In this case, the applicant has failed to meet this evidential burden. The submitted documentation does not provide sufficient proof that all legal and policy obligations have been complied with. Furthermore, the evidence reveals deficiencies and omissions that directly conflict with the applicable legal and policy framework. As a result, these unresolved matters weigh decisively against the granting of planning consent.

1.1.298 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to comply with multiple policies within the National Planning Framework 4 (NPF4) that safeguard nationally important landscapes, heritage assets, and biodiversity. As set out in Policy 11, alongside Policies 4(c) and 4(d), there is a clear requirement to protect National Scenic Areas and nationally important landscapes from significant adverse effects on the qualities for which they are designated. Additionally, Policy 7—including Policy 7(h) concerning scheduled monuments and Policies 7(c) and 7(d) regarding the settings of historic assets—establishes a duty to preserve the cultural significance of such sites. Policy 3 further imposes rigorous tests to ensure biodiversity is maintained and enhanced.

In this case, the proposal would cause significant adverse effects on nationally designated landscapes and seascapes, undermining the fundamental purpose of these designations. Furthermore, the applicant has not demonstrated that the cultural significance of scheduled monuments and their settings would be adequately protected, nor has it been established that island communities, which are intrinsically linked to these heritage assets, would be safeguarded. Finally, the ecological assessments and tests required under Policy 3 have not been shown to be capable of being met on the evidence submitted. This cumulative failure to satisfy the interrelated policies protecting designated assets constitutes a clear conflict with NPF4 and weighs strongly against the proposal's acceptability.

The proposal would result in significant adverse effects on the landscape, heritage, and community interests within the area governed by the Argyll and Bute Local Development Plan 2. These impacts are material to the terrestrial development plan framework and would undermine the objectives set out to protect these valued attributes. The extent of harm identified is sufficient to demonstrate clear conflict with the relevant policies that seek to safeguard the character and integrity of the local environment.

This incompatibility extends beyond the local development plan to the broader strategic context, including the National Planning Framework 4, which must be read as a whole. The proposal fails to align with the overarching national and local policy intentions, as it does not adequately address or mitigate the detrimental effects identified. The applicant has not provided evidence to demonstrate that these conflicts have been resolved or sufficiently mitigated, leaving the adverse impacts unaddressed.

In conclusion, the proposal is fundamentally at odds with the terrestrial development plan framework relevant to land-based effects, particularly the Argyll and Bute Local Development Plan 2. Given the quantified adverse impacts on landscape, heritage, and community interests, and the absence of any compelling justification or effective mitigation, the proposal should be refused planning permission on the basis of these policy conflicts.

1.1.299 Seascape, Landscape and Visual Effects

The assessment methodology employed by the applicant lacks a clearly defined distance threshold beyond which major effects cease, as evidenced by the absence of such a parameter in Appendix 16.1. However, analysis of the applicant's own Chapter 16 and associated appendices reveals a consistent pattern across all three

assessment streams: no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of its intrinsic sensitivity or the extent of visibility. This implicit distance effect is further corroborated by references within the applicant's documents, which indicate that for a coastal area over 30 kilometres away, the scale of change is judged to be small due to viewing distance, and that landscape character synthesis assigns High magnitude effects within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types.

The practical consequence of this methodology is that the protective tests are effectively applied to understated inputs, particularly at distances where the most sensitive designated landscapes are located. By systematically moderating magnitude judgments at these critical distances, the applicant's conclusions fail to reliably characterise the true effects upon the landscapes that Scottish Ministers are required to consider in their decision-making. This methodological shortcoming undermines confidence in the accuracy of the predicted impacts and calls into question the robustness of the assessment upon which consent is sought.

In considering the visualisations presented in support of the application, it is important to note that the mitigation measures proposed rely heavily on these materials to demonstrate their effectiveness in reducing visual impact. However, a detailed analysis reveals inherent limitations in the visual evidence that must temper reliance on such representations. NatureScot's visualisation guidance, which the applicant follows, explicitly recognises that printed visualisations cannot fully replicate the scale and perception experienced by a viewer on site. This acknowledgment highlights a fundamental constraint: the visualisations serve as approximations rather than exact portrayals of the landscape effects. Moreover, the wireline drawings incorporated within the panoramic projections share these inherent limitations. As technical renderings embedded within the photographic visualisation, they do not function as independent corrections or clarifications to the imagery but rather inherit the same perceptual shortcomings. Consequently, while the visual materials provide a useful tool for assessment, their inability to fully convey the true scale and visual experience in the field means that any conclusions drawn from them should be made cautiously. In summary, the visualisation evidence, despite its utility, presents technical and perceptual limitations that reduce its capacity to serve as definitive proof of mitigation success.

While mitigation measures may address some visual impacts of the proposed development during daylight hours, they do not extend to the introduction of aviation and navigation lighting on a currently unlit sea horizon. This permanent alteration of the night-time seascape character would endure throughout the stated 35-year operational life, fundamentally changing an environment that presently experiences no such illumination.

Moreover, the temporal limitation of 35 years does not diminish the policy implications of consenting to this development. Approving the project effectively signals that the seascape in question is appropriate for wind farm use, setting a precedent that may influence future decisions and the long-term character of the area. Consequently, the impact of night-time lighting warrants careful consideration in the planning balance.

The proposal's acknowledged effects on landscape and seascape interests are significant and engage multiple key policies, specifically NPF4 Policies 4(c), 4(d), 11(d), 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively serve to safeguard nationally important landscapes and seascapes, establishing a clear framework against which the proposal must be assessed.

However, the applicant has failed to substantiate that its conclusions regarding the scale of these effects align with its own established methodology. This lack of methodological consistency undermines the reliability of the impact assessment and calls into question the robustness of the evidence presented in support of the proposal. Consequently, there is a failure to demonstrate that the development would comply with the stringent protections afforded by the relevant policies.

In light of this, the proposal does not meet the necessary planning policy requirements designed to protect landscape and seascape interests of national importance. Therefore, on the basis of non-compliance with these fundamental policies, the application should not be supported.

1.1.300 Cultural Landscape, Archaeology and Historic Environment

There is uncertainty regarding the applicant's assessment methodology and the reliability of its conclusions about the impacts on heritage assets. Although the applicant states that it has adopted Historic Environment Scotland's recognised approach for evaluating effects on the setting of historic assets, questions remain about whether this methodology has been correctly applied. This approach, developed through consultation with Historic Environment Scotland, requires a careful evaluation of whether changes to setting affect the contribution that setting makes to the cultural significance of an asset, with particular emphasis on assessing whether the integrity of setting is maintained. Importantly, the methodology makes clear that visual change alone should not be directly equated with adverse impact.

A detailed Methodological Audit, prepared in support of community objections and based solely on the applicant's own Appendix 14.3, highlights that while the operational assessment identifies relevant heritage attributes, it fails to demonstrate how the integrity of setting has been properly assessed in line with the accepted methodology. Instead, the assessment focuses on describing visual changes such as visibility, distance, prominence of monuments, retained views, screening, and skyline occupation. It then concludes that the integrity of setting is adequately retained without showing the required evaluative step that distinguishes between visual change and impact, as mandated by the methodology. This key evaluative analysis is absent in all the examples examined by the Audit.

Given this lack of demonstrated compliance with the prescribed methodology, the assessment's conclusions about the impacts on the heritage setting are undermined and cannot be relied upon without further clarification and evidence. It is therefore essential that the methodology be fully and transparently applied, with the necessary evaluative steps clearly articulated, to ensure a robust and credible understanding of heritage impacts in this case.

While the applicant's assessment acknowledges the cultural significance of the affected heritage assets, highlighting attributes such as pilgrimage, arrival by sea, movement through a living cultural landscape, and the interplay between monuments, spirituality, and their surrounding landscape and seascape, these qualities are primarily experienced through movement rather than fixed viewpoints. Notably, Historic Environment Scotland, as recorded in the application's consultation responses, has requested additional viewpoints to ensure these broader experiential qualities are adequately represented. This suggests that the current assessment may insufficiently capture the full cultural landscape and the dynamic nature of the heritage experience. Therefore, a more comprehensive evaluation incorporating these wider perspectives is necessary to fully understand and mitigate potential impacts on the heritage assets.

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

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

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

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

1.1.301 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development rely to an exceptional degree on visitors, who are drawn specifically by the qualities identified in the applicant's own baseline assessments: landscape, seascape, cultural heritage, tranquillity and remoteness. These attributes form the fundamental appeal that sustains visitor numbers and underpin the local economy.

Any alteration to these defining characteristics would directly undermine the economic foundation of these communities. Such an impact would inevitably extend beyond immediate economic effects, threatening local services, reducing population stability, and ultimately jeopardising the long-term viability of the island settlements. Consequently, the proposal poses a significant risk to the fundamental economic and social sustainability of these island communities.

The applicant's socio-economic assessment fails to provide an adequate understanding of the impacts on island communities, particularly when compared to the detailed evaluation of port communities. While the assessment recognises habitability as a potentially significant pathway affecting island communities, no subsequent place-based analysis of the islands' habitability was undertaken. Instead, Chapter 18 confines its detailed scrutiny to regional and port community impacts, ultimately concluding that island communities exhibit low sensitivity to tourism-related effects. This inconsistent approach undermines the robustness of the assessment and weakens any mitigation strategies proposed for these vulnerable communities.

Island economies are distinctive and cannot be accurately represented by regional averages. Their economic structure is heavily concentrated in sectors that are directly reliant on the attributes attracting visitors, making them inherently more sensitive to any changes affecting those qualities. Indeed, dependence on increasing visitor numbers intensifies, rather than diminishes, their vulnerability. Therefore, the applicant's conclusion of low sensitivity—arrived at without a proper place-specific analysis—is not supported by evidence but rests on an unfounded assumption. This methodological shortcoming calls into question the validity of the socio-economic assessment and the adequacy of proposed mitigations for the island communities concerned.

The applicant acknowledges that island communities require particular scrutiny in the planning process. However, the assessment undertaken falls short of the necessary standard to understand the proposal's effects on these communities. This deficiency is significant given the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions must be based on robust socio-economic evidence and apply a precautionary approach where such evidence is insufficient. Furthermore, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 impose a clear statutory duty to assess and give weight to the interests of island communities through meaningful engagement from the outset to the conclusion of the decision-making process.

Despite these explicit requirements, the applicant has failed to demonstrate that the proposal is compatible with the sustainability of island communities, nor has it evidenced that the statutory duties owed to them have been fulfilled. The lack of meaningful engagement and comprehensive assessment undermines the ability to ensure that the development will not adversely affect these communities. Consequently, the proposal does not comply with the necessary planning policies and statutory obligations designed to protect the social and economic wellbeing of island populations.

1.1.302 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, as identified in the applicant's evidence. Additionally, the surrounding waters serve as habitats for seabirds, marine mammals, and basking sharks. This highlights the ecological importance and sensitivity of the site, given the presence of these protected species and habitats.

The proposed development would introduce extensive construction, operational, and decommissioning activities into this environmentally sensitive area over several decades. Such large-scale and prolonged disturbance carries a significant risk of adverse environmental effects on the Priority Marine Features and protected species present, necessitating careful consideration of potential impacts and mitigation measures.

The applicant's submission of a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan reflects an acknowledgement of the potential for adverse effects on the North Colonsay and Western Cliffs Special Protection Area, specifically targeting the guillemot population. These documents, by their very nature, are prepared for circumstances where it is not possible to exclude adverse impacts on the integrity of the protected site. Their inclusion in the application is therefore a critical feature, signalling that the applicant recognises uncertainties regarding the potential environmental consequences and is proposing measures intended to address these under the relevant derogation provisions.

This approach implicitly accepts that, despite proposed mitigation, there remains a risk that Scottish Ministers may reach a different conclusion concerning adverse effects on the site's integrity. The submitted derogation and compensation plans serve as a procedural safeguard to enable consideration of potential impacts and compensatory measures. However, the presence of these documents also highlights that the applicant's assessments do not definitively exclude harm, placing significant weight on the effectiveness and adequacy of the proposed compensation in any subsequent planning decision. This underscores the importance of rigorous scrutiny of both the potential adverse effects and the compensatory strategies before any consent is granted.

The legal framework governing developments affecting protected habitats is unequivocal in its requirements. Under the Habitats Regulations, consent for such developments may only be granted where the competent authority has ascertained that the proposal will not adversely affect the integrity of the protected site, unless the strict derogation tests are met. Importantly, consent may lawfully be granted only where no reasonable scientific doubt remains regarding the absence of adverse effects. The responsibility to demonstrate this rests squarely with the applicant, who must provide clear and robust evidence to satisfy the statutory requirements. Mitigation, compensation measures, and future monitoring, while relevant, do not in themselves suffice to meet these stringent tests.

This legal obligation is further reinforced by policy provisions within the National Marine Plan and NPF4. Specifically, policies GEN 9 and GEN 13 of the National Marine Plan, alongside Policies 3, 4(b), 4(e), and 4(f) of NPF4, collectively establish a comprehensive policy framework that complements and supports the Habitats Regulations. These policies underscore the need for rigorous assessment and a high

evidential standard when considering developments potentially impacting protected habitats and species, thereby ensuring ecological integrity is maintained.

Given this context, it is essential that any planning decision adheres strictly to these legal and policy requirements. The applicant must convincingly demonstrate beyond reasonable scientific doubt that the proposed development will not adversely affect the protected site's integrity. Without such evidence, consent cannot be lawfully granted. This approach safeguards the protected habitats and species, aligning with both statutory obligations and national planning policies.

The practical consequence of the applicant's failure to meet the statutory tests is that the application cannot lawfully proceed without undermining the protection afforded to internationally important ecological features. This shortcoming directly impacts the decision-making process, as the legal framework requires unequivocal demonstration that such habitats and species will not be adversely affected. Without satisfying these tests, the application's approval would be inconsistent with statutory obligations.

The evidence submitted, including the applicant's own derogation documents, reveals a significant degree of uncertainty regarding the potential impacts on protected habitats and species. This uncertainty stems from a lack of definitive demonstration that the statutory tests can be fulfilled. The tests are designed to safeguard internationally important ecological assets by ensuring that any development avoids, mitigates, or compensates for harm; the applicant has not provided sufficient assurance in this regard.

Consequently, the failure to demonstrate compliance with these legal requirements undermines the case for granting consent. It is essential that development proposals affecting internationally important habitats and species meet the statutory criteria fully and transparently. Given the evidence, it is clear that this application does not meet that standard and therefore should not be approved.

1.1.303 Cumulative and In-Combination Effects

The applicant's evidence clearly establishes that only a portion of the overall development is currently before the Scottish Ministers for consideration. Specifically, the export cable corridor and the onshore transmission works, which are integral components without which the wind farm cannot function, have been deliberately deferred to subsequent applications. This segmentation means that the cumulative effects of the entire project are never assessed concurrently, with critical elements subjected to separate consenting processes following the primary decision. Such an approach is fundamentally flawed, as it undermines the ability of decision-makers to fully comprehend the full scope and impact of the development at the time of determination.

This procedural fragmentation is inconsistent with established legal principles, as underscored in the Raeshaw Farms judgment, which mandates that a project must be evaluated in its entirety rather than being artificially divided into smaller parts whose individual impacts may appear less significant. By salami-slicing the development into discrete components, the current assessment method effectively

circumvents comprehensive scrutiny, potentially obscuring cumulative environmental and planning impacts that would otherwise emerge through an integrated evaluation. Consequently, this approach cannot be considered legally or procedurally sound, and it is imperative that the project be assessed as a whole to ensure compliance with planning law and proper environmental governance.

The cumulative impact assessment presented in the Environmental Impact Assessment relies heavily on the findings of the individual landscape, heritage, and socio-economic assessments. As these foundational assessments have been demonstrated to understate the magnitude of effects, the cumulative assessment consequently adopts this diminished baseline. This approach inherently compromises the reliability of the cumulative impact conclusions.

When the baseline against which cumulative effects are measured is reduced, the combined effects of the proposal alongside other existing, consented, and foreseeable developments are similarly underestimated. This means that the cumulative assessment does not fully capture the true extent of potential harm or change that may arise from the collective development activity within the area. The resulting analysis thus provides an incomplete and potentially misleading picture of the overall environmental and social impacts.

Given that the cumulative assessment is predicated on these flawed baseline assessments, there is a clear risk that decision-makers and stakeholders are not presented with a sufficiently robust understanding of the combined implications. It is therefore essential that the baseline assessments are revisited and accurately reflect the actual conditions to ensure that cumulative effects are properly evaluated and appropriately addressed within the planning process.

There remains significant uncertainty regarding the applicant’s compliance with key planning policies and environmental regulations, specifically concerning project splitting and the assessment of cumulative effects. The proposal fails to demonstrate that the cumulative and in-combination effects, as well as the overall impacts of the project, have been reliably identified and assessed in accordance with GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the EIA Regulations. This lack of clarity undermines confidence in the environmental impact appraisal and the robustness of the decision-making process.

Furthermore, the applicant has not explicitly addressed how deferred works will be treated within the determination, leaving a critical gap in the evaluation of potential adverse effects. It is essential that these deferred elements receive explicit consideration to ensure full compliance with statutory requirements and to provide decision-makers with a comprehensive understanding of the project’s total impact. In light of these shortcomings, it is requested that the treatment of deferred works be expressly addressed before any approval is granted.

1.1.304 Public Engagement, Site Selection and Environmental Information

There is considerable uncertainty as to whether the consultation process associated with this application has met the essential standards of effective public participation. The applicant invites Scottish Ministers to place significant weight on the site-

selection process, yet the deficiencies in public engagement observed at both the plan and site-selection stages have persisted into the current application phase. Given that the application comprises many thousands of pages of technical material, the scale and complexity of the documentation have further complicated meaningful engagement.

Compounding this difficulty, the consultation period coincided with the busiest months of the year for island communities, when residents are engaged continuously throughout the visitor season and access to specialist advice is notably limited. This timing has inevitably constrained the ability of those affected to provide considered and informed responses. In contrast, the applicant has had years to prepare its case, supported by substantial professional and financial resources, thereby creating an imbalance in the consultation process.

Under GEN 18 of the National Marine Plan and the principles enshrined in the Aarhus Convention, it is imperative that those affected by decisions of this magnitude are afforded a realistic opportunity to participate. The conditions under which the communities have been required to respond fall short of this benchmark. It is therefore respectfully urged that Ministers bear these concerns firmly in mind when considering the representations made, recognising the potential implications for the legitimacy of the site-selection process.

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

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

1.1.305 Effects on Local Area

The proposed development encompasses a 448 square kilometre area immediately north-west of Islay and west of Colonsay, positioning these islands as the closest communities directly affected. However, the application's assessment inadequately recognises Islay's role as an impacted island community, instead predominantly considering it as a potential project location. This approach fails to provide any place-based evaluation of the effects on Islay's Atlantic-facing communities, whose proximity to the development area inevitably influences their setting, local economy, and community life.

Similarly, Colonsay and Oronsay face the array directly, with their daily life intimately connected to the seaward outlook. Notably, the North Colonsay and Western Cliffs Special Protection Area, located on Colonsay's coastline, is central to the applicant's derogation case and compensation plan, implicitly acknowledging that harm to the internationally protected seabird population cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance within this community, suffers from the same deficiencies in the heritage assessment, particularly regarding the treatment of its open maritime setting. Consequently, the application's evaluation of environmental and heritage impacts on these islands is insufficiently robust and reliable.

The applicant's assessment underestimates the significant impact that the proposed development would have on the island of Iona, leading to an incomplete evaluation of the environmental and social consequences. The Coastal Character assessment identifies the Sound of Iona as highly sensitive, with direct orientation towards the development, extensive visibility, and a large geographical extent of change spanning approximately 21 kilometres. The turbines would dominate around 39 degrees of the horizon, affecting key areas such as the ferry crossing between Fionnphort and Iona. This scale of visual intrusion is substantial, particularly when compared to familiar landmarks; for example, the tallest turbines would exceed the height of Ben Hynish on Tiree by about 194 metres, despite being viewed at a closer distance of roughly two-thirds.

Furthermore, the West Coast of Iona is acknowledged as highly sensitive with widespread visibility, and the applicant accepts that there would be significant effects on residents and visitors throughout much of the island, including at Dùn Ì, Iona's highest point. Importantly, the island's internationally significant monastic landscape, encompassing the Abbey, the Nunnery, and the high crosses, is intrinsically linked to pilgrimage and movement through the seascape. Historic Environment Scotland requested additional visual viewpoints from critical locations such as the ferry crossing, yet the applicant failed to provide visualisations from elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, leaving gaps in understanding the full heritage impact.

Equally concerning is the social impact on the island community, which has not been thoroughly assessed. A household consultation revealed that 92 per cent of respondents on Iona oppose the proposal, reflecting widespread local objection. Although the applicant's own consultants identified habitability as a potential pathway of effect on the community, this aspect was never properly evaluated. This omission undermines the reliability of the applicant's social impact appraisal and fails to address the lived experience of Iona's residents. Taken together, these factors

demonstrate that the applicant's environmental and social impact evaluation for Iona is incomplete and underestimates the true scale and significance of the effects.

The applicant's assessment acknowledges significant effects on several key locations around Mull and the Ross of Mull, such as Erraid, the Core Paths of the Ross, and Fionnphort, recognising these as areas of high sensitivity and accepting medium magnitude impacts over distances of approximately 21 to 33 kilometres. However, the proposed mitigation measures appear insufficient when compared to the scale of these acknowledged effects, particularly given the economic and community reliance on these areas. For instance, Fionnphort, as the principal gateway to Iona and the primary embarkation point for visitors, is directly linked to the flow of tourism that underpins the local economy. Despite this, there is no detailed, place-based assessment addressing the specific consequences for communities so closely tied to visitor experience.

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

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

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

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

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

The applicant's assessment notably omits consideration of significant effects on several mainland and island communities that have direct views of, and economic reliance upon, the seascape in question. Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by local residents, faces the development waters from the east. Yet, the assessment fails to examine the potential impacts on this finely balanced community and its economy.

Similarly, Ardnamurchan Point, the most westerly point of the British mainland, offers panoramic views along the Hebridean seaboard which attract visitors throughout the peninsula. These seaward panoramas represent receptors of high sensitivity; however, the distance-based moderation approach applied in the assessment overlooks the quality and importance of these views and their associated economic benefits to the local area.

Furthermore, the west coast of Kintyre comprises a series of communities whose identity, character, and visitor economy are closely tied to the open Atlantic seaboard looking towards Islay, Jura, and the surrounding waters. The Treshnish Isles and other nearby small islands and mainland coasts with views towards the proposed development site share a similar reliance on these seascapes. The exclusion of these receptors from the applicant's assessment undermines the comprehensiveness and accuracy of the overall evaluation.

The applicant's reliance on a distance-based approach to assessing environmental effects results in a systematic moderation and discounting of impacts beyond approximately 20 kilometres. This methodology directly leads to the practical

consequence that significant effects on highly sensitive receptors located beyond this arbitrary boundary are understated. Consequently, the communities residing in these areas have not been subject to detailed, place-specific assessment, leaving their exposure to adverse effects effectively unrecognised in the environmental impact evaluation.

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

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

1.1.306 Further Comments

I am a resident of the Northern Isles and am making these objections to support the islanders so terribly affected by this proposed monstrous development. Here in Shetland we have been devastated by the industrial scale of an onshore wind factory and all the associated works such as transmission stations with more to come including offshore. Until the impact of these developments is fully understood from the perspective of the islanders affected it appears those in positions of power are content to continue to allow huge, often foreign owned as here, conglomerates exploit our unique living environments and heritage. Please learn from the consequences and refuse this application.

1.1.307 Summary

The proposal before the Scottish Ministers fails to demonstrate compliance with the governing statutory and policy framework. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the coastal communities and heritage of the area. However, published analyses of the applicant's documentation reveal that these impacts have been understated. Crucially, the necessary heritage assessment has not been undertaken, and although the effects on the island communities affected were identified, they were never properly assessed. Furthermore, the ecological requirements have not been satisfactorily evidenced as capable of being met. It is also pertinent to note that the application submitted represents only a portion of the overall project.

In light of these deficiencies, it is respectfully urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm proposal, along with the associated marine licence. Should the Ministers consider granting approval, it is requested that the applicant be required to provide further environmental information and enhanced visualisations. Additionally, the determination of these applications should be deferred pending a public inquiry, thereby allowing a thorough examination of the issues raised in this objection. Regardless of the outcome, it is further requested that the Ministers explicitly address and conclude on the impacts to cultural heritage and the affected island communities within their formal reasons for decision.

Yours faithfully,

[Redacted]

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

Member of the public 533
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, which are currently the subject of planning application 00012385 for consent under section 36 of the Electricity Act 1989, and application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications have been made by MachairWind Limited, operating under ScottishPower Renewables. I request that this correspondence be recorded as an official objection, that I be noted as an objector, and that I be informed of the determination made on these applications.

The proposed development envisages the installation of an offshore wind farm generating approximately 2 gigawatts of power. The project would consist of between 91 and 144 wind turbines, each with a maximum height of 335 metres to the tip of the blade. The site encompasses a Windfarm Development Area covering around 448 square kilometres of marine space located northwest of Islay and to the west of Colonsay. This area lies approximately 21 kilometres from Iona and is situated in close proximity to various islands and coastal communities within the southern Hebrides.

This objection is grounded in the planning and environmental considerations relevant to the statutory and policy framework governing these applications. It is important to emphasise that the onus lies with the applicant to provide robust and adequate evidence demonstrating compliance with all applicable tests and requirements. The role of objectors is not to disprove, but rather to highlight where the applicant has failed to meet its evidential burden. Having carefully examined the submissions and supporting documentation, it is clear that the applicant has not sufficiently discharged this responsibility. Consequently, I assert that consent for the MachairWind Offshore Wind Farm should be refused.

1.1.308 Legislative and Policy Framework

The proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018. This statutory requirement obliges decision-makers to explicitly account for the unique circumstances and needs of island communities during the planning process. The submitted documentation does not demonstrate compliance with this duty, nor does it provide adequate evidence that the interests of island communities have been sufficiently identified, assessed, or integrated into the decision-making framework. Such deficiencies constitute a clear omission and conflict with the applicable legal and policy framework. In accordance with the established principle that where compliance with the Islands (Scotland) Act 2018 is not demonstrated, or where evidence reveals shortcomings or legal conflicts, these factors must weigh against the granting of consent. Therefore, on the basis of the failure to properly consider and give due weight to island communities' interests as required by the Islands (Scotland) Act 2018, the application should be refused.

1.1.309 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to comply with multiple National Planning Framework 4 policies designed to protect nationally important landscapes, heritage assets, and biodiversity, resulting in significant adverse consequences. Specifically, it conflicts with Policy 11, which operates alongside Policy 4(c) and 4(d) protecting National Scenic Areas and nationally important landscapes from substantial harm to the qualities for which they are designated. Furthermore, it does not satisfy Policy 7, including 7(h) concerning scheduled monuments and Policies 7(c) and 7(d) on the setting of historic assets. Additionally, the proposal falls short of Policy 3's requirements on biodiversity protection. The evidence demonstrates that the development would cause significant adverse effects on nationally designated landscapes and seascapes. It has not been adequately shown that the cultural significance of scheduled monuments and their settings would be preserved, nor that island communities would be safeguarded. Crucially, the ecological assessments and tests required by these policies have not been proven to be met based on the submitted evidence. Consequently, the proposal is incompatible with these key NPF4 policies safeguarding designated assets.

1.1.310 Seascape, Landscape and Visual Effects

The applicant's assessment methodology fails to specify any distance threshold beyond which major effects are considered to cease, resulting in a systematic understatement of potential impacts on sensitive receptors. Analysis of the applicant's own Chapter 16 and Appendices 16.1 to 16.3 reveals a consistent pattern: no highly sensitive receptor located beyond approximately 20 kilometres from the development is attributed the highest magnitude of change, regardless of its inherent sensitivity or the extent of visibility. This omission directly affects the reliability of the predicted effects and thus the validity of the protective assessments.

Further evidence within the applicant's documents confirms the influence of distance on the assessment outcomes. For instance, a coastal area situated over 30 kilometres from the site is judged to experience only a small scale of change due to viewing distance. Additionally, the Landscape Character synthesis differentiates magnitude of change by distance bands, assigning High magnitude within around 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. Such gradations indicate an implicit, though unarticulated, distance threshold that governs the evaluation of visual and landscape effects.

The practical consequence of this approach is that the protective tests required to safeguard sensitive designated landscapes are applied to inputs that are systematically moderated by distance. As a result, the conclusions presented to the Scottish Ministers do not reliably represent the true extent of effects at distances where the most sensitive landscapes are located. This calls into question the robustness of the applicant's assessment methodology and undermines confidence in the overall findings submitted for consent consideration.

1.1.311 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment purports to follow Historic Environment Scotland's established methodology for evaluating effects on the setting of historic assets,

which necessitates an appraisal of how changes to setting influence its contribution to cultural significance and whether the integrity of that setting is maintained. This methodology explicitly clarifies that visual change alone should not be directly equated with adverse impact. However, the operational assessment submitted, as examined in the Methodological Audit relying solely on the applicant's Appendix 14.3, identifies relevant heritage attributes but fails to demonstrate the critical evaluative step of assessing the integrity of setting in accordance with the accepted methodology.

Instead, the assessment primarily describes aspects of visual change—such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—and then asserts, without evidential evaluation, that the integrity of setting is adequately retained. The Audit highlights that this evaluative step, required by the methodology to underpin conclusions about heritage impact, is absent in all examined examples. Consequently, the reliability of the applicant's conclusions regarding the effects on the setting of historic assets is undermined, casting doubt on the robustness of the heritage impact assessment as a whole.

The applicant's baseline assessment acknowledges that the cultural significance of the heritage assets in question arises from a combination of factors, including pilgrimage, arrival by sea, movement through an active cultural landscape, and the interrelationships between monuments, spirituality, and the encompassing landscape and seascape. Importantly, these qualities are experienced dynamically through movement rather than from static viewpoints. Despite this recognition, Historic Environment Scotland's consultation responses, as recorded within the application, have highlighted the need for additional viewpoints to ensure these broader experiential and cultural landscape qualities are adequately captured and represented. This suggests that the current assessment may not fully encompass the depth of the heritage assets' cultural significance, potentially leading to an incomplete understanding of the impacts. Therefore, it is essential that the evaluation of heritage effects incorporates these wider landscape and experiential factors to inform a more comprehensive and appropriate heritage impact assessment.

1.1.312 Ecology, Biodiversity and Habitats Regulations

The proposed development poses a significant risk to the ecological integrity of the site and its surrounding waters due to the presence of Priority Marine Features and Annex I habitats within the development area. These habitats are of recognised conservation importance and are known to support a range of sensitive species, including seabirds, marine mammals, and basking sharks. The introduction of large-scale construction, operational, and decommissioning activities over several decades would inevitably disturb these species and their habitats, potentially resulting in substantial adverse environmental effects. Given the ecological sensitivity and the scale and duration of the proposed activities, the environmental risks associated with the development are considerable and warrant thorough reconsideration.

1.1.313 Cumulative and In-Combination Effects

The current assessment approach is fundamentally flawed because it considers only part of the project, namely the wind farm itself, while deferring key components such as the export cable corridor and the onshore transmission works to subsequent applications. As these elements are essential for the operation of the wind farm, their exclusion means that the full effects of the project are never evaluated together. This segmented approach contradicts established legal principles, as confirmed by the courts in Raeshaw Farms, which require that a project be assessed in its entirety rather than divided into smaller parts whose individual impacts appear less significant. By fragmenting the consenting process in this way, important aspects of the project's environmental and planning implications are deferred until after the principal decision has been made, thereby undermining the integrity and completeness of the overall assessment.

The cumulative impact assessment presented is fundamentally unreliable due to its reliance on flawed baseline evaluations. By adopting the conclusions from other sections of the Environmental Impact Assessment, it inherits their understated assessments of landscape, heritage, and socio-economic effects. This initial underestimation directly leads to a diminished foundation for evaluating cumulative impacts.

When these baseline assessments fail to capture the full extent of existing and potential effects, the subsequent cumulative assessment likewise understates the combined impacts of the current proposal alongside other developments that are existing, consented, or foreseeable. Consequently, decision-makers are presented with an incomplete picture that risks undervaluing the true scale of environmental and community change.

Given this, it is essential that the cumulative impact assessment be revisited with accurate and comprehensive baseline data. Only then can the combined effects be properly understood and addressed in the planning process, ensuring decisions are made on a sound and transparent evidential basis.

1.1.314 Public Engagement, Site Selection and Environmental Information

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

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

seasonal pressures on the population, have constrained the ability of those most impacted to participate effectively.

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

1.1.315 Effects on Local Area

There remains considerable uncertainty regarding the adequacy of the applicant's assessment of the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Although Islay and Colonsay lie closest to the development area—which extends over 448 square kilometres immediately north-west of Islay and west of Colonsay—the application primarily considers Islay in terms of its potential as a direct project location. This approach neglects a thorough place-based evaluation of the effects on Islay's Atlantic-facing communities, who confront the nearest edge of the development area and whose setting, economic activities, and community life are likely to be materially affected. Similarly, for Colonsay and Oronsay, the seaward outlook integral to daily life directly faces the proposed array. The North Colonsay and Western Cliffs Special Protection Area, forming Colonsay's coastline, is central to the applicant's derogation case and compensation plan, implicitly acknowledging that harm to the internationally protected seabird population of these cliffs cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance within this community, is subject to the same deficiencies identified elsewhere in the heritage assessment, particularly concerning the appraisal of its open maritime setting. Taken together, these points demonstrate that the applicant's evaluation underestimates the potential adverse impacts on these island communities and their heritage assets, thereby undermining the reliability of the overall environmental and heritage impact assessment.

The applicant's own Coastal Character assessment recognises the Sound of Iona as an area of high sensitivity, directly facing the development site with extensive visibility. It identifies a large geographical extent of change, approximately 21 kilometres in range, where turbines span about 39 degrees of the horizon, resulting in a Moderate and Significant overall effect. Similarly, the West Coast of Iona is acknowledged as highly sensitive, with widespread visibility of the proposed development. The applicant accepts that residents and visitors across much of the island, including at its highest point, Dùn Ì, will experience significant visual effects. These findings underscore the substantial scale of visual impact on Iona, yet they appear to understate the full extent of the experience for the island's community and visitors.

Beyond visual considerations, the heritage implications are profound. Iona's monastic landscape, encompassing the Abbey, the Nunnery and the high crosses, is of international importance, with significance closely tied to pilgrimage, arrival by sea and movement through the landscape, as noted in the applicant's baseline studies. Historic Environment Scotland requested additional visual viewpoints, including from

the ferry crossing, a key arrival experience, yet the applicant has not provided a visualisation from critical elevated locations such as the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn. Furthermore, community consultation reveals strong opposition, with 92 per cent of respondents objecting to the proposal. Despite the applicant's consultants identifying habitability as a potential pathway of effect for the island community, no assessment of this impact has been undertaken. The perceived scale of the turbines is further illustrated by comparison with Ben Hynish on Tiree, a familiar landmark visible from Iona at 33 kilometres and 141 metres high; the largest turbines would exceed this height by approximately 194 metres while being located at roughly two-thirds of that distance. Taken together, these factors indicate that the applicant's assessment significantly underestimates the scale and significance of the visual, community and heritage effects on Iona, thereby compromising the accuracy of the environmental and social impact evaluation.

The applicant's assessment of the impacts on wider seaboard designated landscapes and island communities appears to understate the significance of effects, particularly when considering the scale of potential mitigation compared to the inherent qualities of these areas. For example, while the applicant acknowledges the panoramic maritime qualities of Staffa, located approximately 35 kilometres from the development area and within the Loch na Keal National Scenic Area, it concludes that the scale of change there would be small and the effect not significant. This conclusion is reached despite Staffa lying beyond the approximate 30 kilometre distance to which NatureScot advised the assessment of effects on National Scenic Area qualities should extend, suggesting that the assessment may not fully account for the broader seascape impact.

Similarly, the Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is described as having high sensitivity within a range of approximately 28 to 32 kilometres from the development, yet the applicant attributes only a medium to low magnitude of effect. This moderation is explained by distance, apparent scale, and retained landforms; however, such an approach risks undervaluing the fundamental qualities that underpin Jura's designation. The same rationale is applied to the Scarba, Lunga and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres from the site, where the applicant's assessment likewise limits the magnitude of effect without thoroughly addressing the cumulative impacts on these sensitive seascapes.

Of particular concern is the omission of any specific assessment of Ulva, a community-owned island within the Loch na Keal National Scenic Area that shares fully in the effects on that designated landscape. Ulva is a small, re-establishing community whose recovery depends on the unspoilt qualities of its setting and surrounding seascape. The absence of dedicated consideration for Ulva's unique social and environmental context undermines the protection of its natural and cultural qualities. Overall, the applicant's approach tends to underestimate significant effects on both designated landscapes and vulnerable island communities, thereby weakening the safeguard of their important attributes.

The applicant's assessment categorises the South Tiree coastal area as having High sensitivity at a distance of approximately 35 kilometres, yet attributes only a Low magnitude of change to the proposed development. This characterisation warrants

further scrutiny. Tiree is an exceptionally low-lying island, with its landscape character fundamentally shaped by the dominance of sea and sky. Its highest elevation, Ben Hynish, reaches merely 141 metres above sea level. Given this context, the introduction of turbines up to 335 metres in height would represent vertical elements unprecedented within Tiree's open oceanic horizon. Such structures would inevitably alter the island's distinctive seascape character in a manner far more substantial than the assessment acknowledges. Therefore, the conclusion of a Low magnitude of change for a receptor as exposed and sensitive as Tiree appears to significantly understate the true magnitude of impact, undermining the reliability of the overall evaluation.

The applicant's assessment applies a distance-based moderation to mitigate perceived effects on visual receptors, yet this approach is insufficient in addressing the specific circumstances of mainland and island communities directly facing the development. For example, Gigha, a community-owned island emblematic of island regeneration, lies to the east of the proposed site and depends heavily on its carefully balanced social and economic fabric. The absence of any examination of impacts upon Gigha's community and economy reveals a significant omission in the assessment, undermining its comprehensiveness. Similarly, Ardnamurchan Point, as the most westerly point of the British mainland, offers expansive panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas represent precisely the type of receptor for which the applicant's distance-based mitigation is claimed, yet their significance is not adequately considered.

Furthermore, the west coast of Kintyre comprises a succession of communities whose identity, character, and visitor economy are intrinsically linked to the open Atlantic seaboard facing Islay, Jura, and the surrounding waters. The Treshnish Isles and other small islands, together with adjacent mainland coasts that have direct views toward the development area, share this reliance on the seascape. The failure to assess the effects on these interconnected communities and landscapes results in a substantial gap in understanding the full implications of the proposal. Without a detailed appraisal of these receptors, the assessment cannot be regarded as comprehensive or robust, and decision-making is consequently compromised.

The applicant's environmental impact assessment employs a distance-based methodology which systematically moderates and discounts the magnitude of change experienced by highly sensitive receptors located beyond approximately 20 kilometres from the development site. This approach is evidenced by the observation that where such receptors exist beyond this distance threshold, the assessment reduces the perceived effect magnitude and correspondingly lowers the significance attributed to those effects. Consequently, communities residing in these more distant locations have not been subjected to any place-based assessment, resulting in a lack of detailed consideration of their specific environmental sensitivities and the actual impacts they endure.

This systematic underestimation and discounting of effects beyond 20 kilometres undermines the integrity of the environmental impact assessment as a whole. By applying a generalized distance criterion rather than a nuanced, receptor-specific evaluation, the assessment fails to adequately capture the true extent and

significance of environmental effects on sensitive communities outside the immediate vicinity. This methodological limitation not only diminishes the weight given to distant receptors but also neglects the lived experience of those communities, thereby compromising the comprehensiveness and robustness of the environmental appraisal. Such a practice calls into question the reliability of the conclusions drawn and indicates a need for a more rigorous, place-based assessment that fully accounts for effects irrespective of distance.

1.1.316 Personal Observations

In addition to the planning matters above, I am personally concerned because: I am from overseas. I visit pilgrimage to iona and believe it to be a sacred place. Not just iona but the whole area. The proposed development detracts from all that makes the placw sacred to the local community but worldwide. This issue is not juat local it affwcts us all. Just the knowledge that iona and its suerounds is there and unspoilt is an asset to humanity and concerns every global citizen

Based on my own local knowledge, I also wish to highlight that: All of the above in the local sense and as environmwbtal capital

Finally, I would also ask the Scottish Ministers to consider: Alternatives. ...

1.1.317 Further Comments

Iona is a sacred place...we are stewards...leave it be

1.1.318 Summary

The proposal for the MachairWind Offshore Wind Farm has not satisfactorily demonstrated compliance with the relevant statutory and policy frameworks governing its determination. The applicant’s own assessments acknowledge significant impacts on nationally designated landscapes, as well as on the heritage and communities of this coastal region. Moreover, published analyses of the applicant’s documentation reveal that the magnitude of these impacts has been understated. Crucially, the mandatory heritage assessment has not been undertaken, and although the effects on the island communities involved were identified, they were never subjected to proper evaluation. The ecological requirements set out by law have also not been demonstrated as achievable. In addition, it is important to note that only a portion of the overall project is currently presented for consideration by the Scottish Ministers.

In light of these substantial deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm proposal, as well as to decline the associated marine licence application. Should the Ministers be inclined to grant approval, I request that they require the submission of further environmental information alongside enhanced visual representations of the development. Furthermore, I recommend that the applications be determined only following a public inquiry, which would allow a thorough examination of the issues raised in this objection. Regardless of the outcome, I also ask that the Ministers explicitly address

the effects of the proposal on cultural heritage and the impacted island communities within their decision-making rationale.

Yours faithfully,

[Redacted]

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

Member of the public 534
Dear Sir/Madam,

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

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

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

1.1.319 Legislative and Policy Framework

The application before the Scottish Ministers fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989. This Schedule explicitly requires the applicant to have regard to the desirability of preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, as well as protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant must take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The Scottish Ministers, in determining this application, are similarly bound to have regard to these statutory duties.

The evidence provided does not establish that these requirements have been adequately addressed. There is a clear absence of demonstrated compliance, and the application contains deficiencies and omissions in relation to the preservation and conservation obligations mandated by Schedule 9. These shortcomings represent a failure to meet the legal and policy framework that governs such proposals. Given these unresolved uncertainties and the lack of satisfactory mitigation measures, the application does not satisfy the statutory criteria necessary for consent to be granted. Accordingly, these matters weigh decisively against the approval of the proposal.

The marine licence application is subject to determination under Part 4 of the Marine (Scotland) Act 2010 and must be assessed in accordance with Scotland's National Marine Plan unless relevant considerations indicate otherwise. The statutory framework requires that the proposal complies with a range of General Policies, notably GEN 4 on Co-existence, GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 and paragraph 4.85 addressing Cumulative Impacts. These policies collectively form an integral part of the statutory assessment process for the application.

However, the application fails to demonstrate compliance with these statutory requirements and relevant policies of the National Marine Plan. The evidence identifies deficiencies and omissions in the submission, including inadequate consideration of cumulative impacts and insufficient engagement as required by GEN 18. Furthermore, the application does not provide sound evidence to satisfy the requirements of GEN 19, nor does it adequately address potential effects on the historic environment and landscape designations as stipulated in GEN 6 and GEN 7. These shortcomings represent clear conflicts with the applicable legal and policy framework.

Given these unresolved deficiencies and the absence of demonstrated compliance, the application does not meet the statutory criteria for authorisation under the Marine (Scotland) Act 2010 and the National Marine Plan. In accordance with the established legal position, such failures weigh decisively against the granting of consent for the proposed marine licence. Therefore, the application should be refused on these grounds.

The applicant's submission acknowledges that National Planning Framework 4 (NPF4) is a significant material consideration and that Policies 3 (Biodiversity), 4 (Natural Places), 7 (Historic Assets and Places), and 11 (Energy) are directly engaged by this proposal. However, the evidence before the determining authority does not demonstrate compliance with these key policies.

NPF4 must be applied alongside relevant statutory duties and legislative requirements, and where compliance is not shown, or where deficiencies, omissions, or conflicts with the legal and policy framework exist, these factors weigh against granting consent. In this case, the applicant has failed to provide sufficient evidence to confirm that the proposal meets the biodiversity objectives of Policy 3, nor has it adequately addressed the protection and enhancement of natural places as required by Policy 4. Similarly, the impact on historic assets and places has not been satisfactorily assessed or mitigated in accordance with Policy 7. Furthermore, the proposal does not demonstrate conformity with Policy 11 concerning energy considerations.

Given these unresolved deficiencies and the absence of demonstrated compliance with the statutory and policy requirements of NPF4, the proposal conflicts with the applicable legal and policy framework. Consequently, these matters must be afforded significant weight against the granting of planning permission.

The proposal fails to comply with the fundamental legal requirements set out in the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations, which mandate that the likely significant environmental effects of any development must be thoroughly identified, assessed, and reported prior to determination. This statutory obligation is not met in the current submission, resulting in a deficient environmental impact assessment that precludes a lawful and informed decision-making process. Without a comprehensive and robust assessment, the determining authority cannot properly evaluate the environmental consequences of the proposal, thereby undermining the integrity of the planning process.

Furthermore, the proposal does not satisfy the requirements of the Habitats Regulations, which explicitly require an assessment of the effects on European protected sites in accordance with the applicable statutory tests. The absence of a demonstrably adequate habitats regulations assessment means that the potential impacts on protected habitats and species have not been properly considered or mitigated. This omission is a critical failure, as it contravenes statutory duties designed to safeguard biodiversity and protected sites, and it prevents the authority from fulfilling its legal obligations under the Habitats Directive and related domestic legislation.

Given these clear deficiencies and omissions in both the environmental impact assessment and the habitats regulations assessment, the proposal is in direct conflict with the applicable legal and policy framework. Where compliance with these statutory requirements has not been demonstrated, the law and planning policy dictate that such failures must weigh decisively against the granting of consent. Consequently, the application should be refused on the grounds that it does not meet the essential environmental assessment and habitats protection standards required by law.

The applicant’s submission fails to demonstrate compliance with the requirements set out in the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be considered and afforded due weight throughout the decision-making process. The evidence provided does not show that these statutory obligations have been met, nor does it address how the proposal impacts island communities in a manner consistent with the Act’s provisions. This omission represents a fundamental procedural deficiency in the application, as the statutory framework explicitly requires that such considerations be integral to the assessment and determination of planning proposals affecting island areas.

Given that compliance with the Islands (Scotland) Act 2018 has not been demonstrated, and the evidence identifies clear omissions in addressing the interests of island communities, these failings constitute a direct conflict with the applicable legal and policy framework. Under the established legal principles, where such deficiencies exist, they must weigh against the granting of consent. Therefore, the proposal should be refused on the basis that it does not properly consider or give due weight to the interests of island communities as required by the Islands (Scotland) Act 2018.

The applicant has failed to meet the fundamental responsibility of demonstrating compliance with all relevant legal and policy requirements through robust, objective, and proportionate evidence. It is incumbent upon the applicant to provide clear proof that every statutory duty, planning policy, and environmental assessment obligation has been fully satisfied. In this case, the evidence submitted does not establish such compliance. Instead, it reveals deficiencies, omissions, and conflicts with the applicable legal and policy framework. Given these shortcomings, the application cannot be considered to have fulfilled the necessary evidential burden, and these failures weigh decisively against the granting of consent.

1.1.320 Conflict with National Planning Framework 4 and the Development Plan

NPF4 Policy 11 sets out a framework supporting renewable energy development, yet it does so explicitly through the application of impact criteria contained within the policy itself. Among these, Policy 11(c) addresses impacts on communities, while Policies 11(d) and 11(e) concern effects on landscape, seascape, and other receptors. It is therefore essential that any proposal aligns with these criteria to benefit from the policy's presumption in favour of renewable energy projects.

In the present case, the proposal fails to satisfy these impact criteria. It would result in significant adverse effects on nationally designated landscapes and seascapes, undermining the policy's protection for such valued environmental assets. Furthermore, the evidence submitted does not adequately demonstrate that the cultural significance of scheduled monuments and their settings would be preserved, nor does it show that island communities would be safeguarded from harm. Additionally, the ecological tests required by Policy 11 have not been proven capable of being met on the basis of the material provided. Consequently, the proposal conflicts with the impact criteria of NPF4 Policy 11, and as such, cannot be regarded as compliant with the policy's requirements.

In considering the proposal against the relevant policies within the National Planning Framework 4, it is apparent that the mitigation measures put forward do not adequately address the protections afforded to designated assets. Policy 11 must be read alongside Policies 4(c) and 4(d), which specifically safeguard National Scenic Areas and nationally important landscapes from significant adverse effects. Furthermore, Policies 7, including 7(h) concerning scheduled monuments and 7(c) and 7(d) relating to the setting of historic assets, as well as Policy 3 on biodiversity, establish a comprehensive framework for protection. The evidence shows that the proposed development would cause significant adverse effects to these nationally designated landscapes and seascapes, and the mitigation proposed falls short of preventing such harm.

Moreover, the submission has not demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, nor has it shown that the interests of island communities would be adequately safeguarded. Crucially, the ecological assessments fail to meet the necessary tests outlined in Policy 3, with no convincing evidence that biodiversity impacts can be effectively mitigated. Taken together, these shortcomings confirm that the proposal conflicts with the suite of NPF4 policies designed to protect nationally important landscapes, heritage assets, and biodiversity, and therefore cannot be supported.

In comparison to available mitigation measures, the proposal fails to adequately address the adverse impacts it would have on the landscape, heritage, and community interests protected by the terrestrial development plan framework, including the Argyll and Bute Local Development Plan 2. The identified conflicts with these policies are clear and significant, indicating that the proposal would cause harm to the local environment and cultural assets. Consequently, it is evident that the proposal is inconsistent with both the development plan and the National Planning Framework 4 when considered in their entirety. The applicant has not provided sufficient evidence to demonstrate that these conflicts can be overcome or mitigated to an acceptable degree. Therefore, the proposal does not align with the relevant terrestrial development plan framework and should be regarded as contrary to established planning policy.

1.1.321 Seascape, Landscape and Visual Effects

The assessment methodology employed by the applicant exhibits a significant limitation in its treatment of distance thresholds, which undermines the reliability of the predicted effects. Notably, the applicant's written methodology in Appendix 16.1 does not specify any distance beyond which major effects are considered to cease. Nevertheless, a published Evidence Note, which draws exclusively on the applicant's Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern across all three assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of the receptor's sensitivity or the extent of visibility.

Further examination of the applicant's own documents confirms the critical role distance plays in shaping these judgements. For instance, the assessment of a coastal area situated over 30 kilometres from the site concludes that, owing to the viewing distance, the scale of change is small. Additionally, the Landscape Character synthesis categorises magnitude as High within roughly 20 kilometres, Medium between approximately 20 and 30 kilometres, and Low beyond about 30 kilometres for certain landscape types. This systematic moderation of magnitude at distances coinciding with the location of the most sensitive designated landscapes results in protective tests being applied to understated inputs. Consequently, the conclusions presented fail to provide a reliable description of the effects that the Scottish Ministers are being asked to consider for consent.

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

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

visual impact, underscoring the need for caution when interpreting these materials in the planning assessment.

The applicant's evidence acknowledges that the proposed development would introduce aviation and navigation lighting to a currently unlit sea horizon, thereby permanently altering the character of the night-time seascape over its 35-year operational life. This change is not merely a temporal inconvenience; it represents a lasting transformation of the seascape's intrinsic qualities. Furthermore, the policy implications of consenting to such development extend beyond the finite operational period. Granting permission would signify a formal recognition that this particular seascape is appropriate for wind farm use, thereby setting a precedent with potentially enduring consequences for the character and perception of the area at night. In summary, the introduction of lighting effects would cause a substantive and lasting impact on the night-time seascape, and the decision to approve would carry significant policy weight regarding the future use and character of this seascape.

There remains significant uncertainty regarding the proposal's compliance with key planning policies designed to safeguard landscape and seascape interests. The applicant has failed to demonstrate that its conclusions about the scale of the accepted effects align with its own assessment methodology. Consequently, it has not established that it meets the requirements set out in NPF4 Policies 4(c) and 4(d), Policies 11(d) and 11(e), GEN 7, or paragraph 4.28 of the National Marine Plan, all of which are expressly intended to protect nationally important landscapes and seascapes. In light of this, the proposal does not accord with these relevant policies and cannot be supported.

1.1.322 Cultural Landscape, Archaeology and Historic Environment

There is considerable uncertainty surrounding the applicant's assessment methodology and its application in evaluating the impact on the setting of historic assets. Although the applicant asserts adherence to the recognised methodology developed by Historic Environment Scotland, concerns arise as to whether this approach has been properly followed in practice. This methodology explicitly requires an evaluation of how changes to setting affect the contribution that setting makes to the cultural significance of heritage assets, alongside an assessment of whether the integrity of that setting is maintained. Importantly, it cautions against equating visual change directly with adverse impact, emphasising a more nuanced approach.

A detailed review of the applicant's operational assessment, particularly as documented in Appendix 14.3, reveals a focus on describing visual changes such as visibility, distance, monument prominence, retained views, screening, and skyline occupation. However, this review, presented in a published Methodological Audit prepared to support community objections, identifies a critical omission: the assessment does not demonstrate how the integrity of setting has been evaluated in line with the applicant's own accepted methodology. The essential evaluative step—determining whether the integrity of the setting is adequately retained—is not clearly evidenced in any of the examples examined by the Audit.

This lack of clarity and apparent methodological shortcoming undermines confidence in the reliability of the applicant's conclusions regarding heritage impacts. Without a transparent and rigorous demonstration that the integrity of setting has been properly assessed, the findings cannot be confidently accepted. It is therefore essential that this aspect of the assessment is revisited to ensure compliance with the recognised methodology and to provide a robust basis for decision-making on heritage matters.

The applicant's assessment acknowledges that the cultural significance of the affected heritage assets stems from experiential qualities such as pilgrimage, arrival by sea, and movement through a living cultural landscape, including the interrelationships between monuments, spirituality, and the surrounding landscape and seascape. However, the proposed mitigation measures appear insufficient in addressing these dynamic and experiential aspects, as they focus predominantly on fixed viewpoints rather than the broader cultural landscape experienced through movement. This limitation risks an incomplete understanding and inadequate protection of the heritage assets' full significance.

Furthermore, Historic Environment Scotland's consultation responses, as recorded in the application, highlight the need for additional viewpoints to adequately represent these wider cultural qualities. The absence of such comprehensive viewpoints undermines the assessment's ability to capture the nuanced relationships and experiential values critical to the heritage assets. Consequently, the applicant's current approach does not fully reflect the cultural baseline, thereby compromising the robustness of the heritage impact evaluation. It is essential that these broader qualities are properly incorporated to ensure an accurate and respectful appraisal of heritage impacts.

The practical consequence of the shortcomings identified in the landscape assessment is that the subsequent heritage impact conclusions cannot be regarded as fully reliable. Since the heritage conclusions are directly dependent on the landscape assessment, any understatement of landscape effects inevitably results in a corresponding understatement within the heritage evaluation. This dependency means that the heritage impact findings are compromised to the extent that the landscape assessment fails to accurately capture the true magnitude of effects.

In this context, the evidence clearly indicates that where landscape effects have been understated as previously outlined, the heritage conclusions built upon these findings inherit the same deficiency. This linkage undermines the credibility of the heritage impact assessment and suggests that a more robust and comprehensive landscape analysis is essential to support sound heritage conclusions. Without addressing these deficiencies, the planning authority risks making decisions based on incomplete or misleading information regarding the potential heritage impacts.

The practical consequence of the application's failure to adequately address heritage considerations is that it does not comply with essential policy requirements designed to safeguard important cultural assets. This deficiency directly undermines the acceptability of the proposal, as it leaves unresolved the potential harm to heritage sites of international and national significance. Without clear evidence that the cultural significance and settings of these assets will be protected, the proposal

cannot be deemed consistent with the necessary standards for heritage conservation.

This issue engages several specific policies within the National Planning Framework 4 (NPF4), notably Policy 7(h) concerning scheduled monuments, as well as Policies 7(c) and 7(d) which address the setting of heritage assets. Additionally, the application must be considered in light of Policy GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan, all of which collectively establish a robust framework for protecting heritage in the planning process. The applicant's submission, however, fails to provide the required assessments or evidence demonstrating compliance with these policies.

Crucially, the Scottish Ministers are not presented with the necessary information to conclude that the cultural significance of these heritage assets and their settings would be preserved. This absence of a comprehensive assessment means the proposal does not meet the policy tests for heritage protection, thereby impeding the decision-making authority's ability to approve the application confidently. On this basis, the application falls short of meeting the statutory and policy obligations, leading to the conclusion that it should not be supported in its current form.

1.1.323 Effects on Island Communities, Tourism and the Local Economy

The island communities subject to this proposal exhibit an exceptional dependence on visitors, whose arrival is principally motivated by the very qualities identified within the applicant's baseline assessments: landscape, seascape, cultural heritage, tranquillity, and remoteness. These attributes constitute the core attractions that underpin the local tourism economy. Any alteration to these intrinsic qualities is therefore not merely an aesthetic or environmental concern but represents a direct threat to the fundamental economic structure of these communities.

The economic base supported by visitor expenditure sustains local services, underpins population retention, and ensures the ongoing viability of these island settlements. Disruption or degradation of the key qualities that attract visitors will have cascading effects, undermining service provision and jeopardising the social fabric and long-term sustainability of the islands. Thus, the proposal, by impacting these critical attributes, endangers the essential economic and social resilience of these communities.

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

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

There remains significant uncertainty regarding the proposal's compliance with established policy and statutory duties concerning island communities. The requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan emphasise that decisions must be based on robust socio-economic evidence, applying a precautionary approach where such evidence is insufficient. Additionally, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 mandate that the interests of island communities are assessed thoroughly and afforded appropriate weight, with meaningful engagement from the earliest stages through to the final decision. This framework is designed to ensure that island communities, which often have distinct social and economic characteristics, are not overlooked or adversely impacted by development proposals.

However, the applicant has acknowledged the need for particular scrutiny of island communities but has failed to undertake the necessary assessment to understand the effects of the proposal on these communities. There is no demonstration that the proposal aligns with the principles of sustainable island communities, nor that the statutory duties towards these communities have been discharged. This lack of compliance with key policy and statutory requirements undermines confidence that the proposal can proceed without detrimental consequences to island communities. Accordingly, it is concluded that the application should not be approved in its current form, given its failure to meet the essential standards of assessment and protection for island communities.

1.1.324 Ecology, Biodiversity and Habitats Regulations

The proposed development would bring construction, operational, and decommissioning activities into an ecologically sensitive marine environment on a very large scale and for an extended period of several decades. This sustained presence of industrial activity is likely to have significant adverse effects on the local ecosystem due to the scale and duration of disturbance.

The site itself contains Priority Marine Features and Annex I habitats, which are recognised for their ecological importance and vulnerability. Surrounding waters are also home to a range of protected species, including seabirds, marine mammals, and basking sharks. The presence of such habitats and species underscores the high environmental sensitivity of the area and the potential for the proposed development to cause substantial ecological disruption.

Given these factors, careful consideration must be given to the potential environmental impacts before proceeding. The scale of activity and the ecological value of the site and adjacent waters together indicate a significant risk of harm to protected habitats and species, which must be fully accounted for in the planning process.

The submission of a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan represents a practical acknowledgement by

the applicant that the proposed development may have adverse effects on the North Colonsay and Western Cliffs Special Protection Area, specifically concerning the guillemot population. These documents are typically prepared to address situations where an adverse effect on the integrity of a protected site cannot be ruled out, indicating that the applicant has anticipated potential ecological impacts that require mitigation under the relevant derogation provisions.

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

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

The applicant has not demonstrated that the statutory tests designed to protect internationally important habitats and species can be satisfied, as evidenced by their own derogation documents. This failure to meet the legal requirements for safeguarding these ecological features fundamentally undermines the justification for granting consent. On the evidence submitted, the applicant’s case lacks the requisite degree of certainty that these critical protections will be upheld. Therefore, the application should be refused on the basis of non-compliance with statutory obligations.

1.1.325 Cumulative and In-Combination Effects

The applicant’s evidence clearly demonstrates that only a portion of the project is presently before the Scottish Ministers, with critical components such as the export cable corridor and the onshore transmission works deferred to subsequent applications. These elements are essential for the operation of the wind farm, yet their effects are excluded from the current assessment. Consequently, the cumulative impacts of the entire project are never evaluated together. This fragmented approach directly contradicts the legal principle established in Raeshaw Farms, which mandates that a project must be assessed in its entirety rather than

segmented into smaller parts whose individual effects may seem less significant. By postponing the consideration of vital components until after the principal decision, the current process undermines comprehensive evaluation and risks overlooking significant environmental and planning impacts.

The cumulative impact assessment as presented relies fundamentally on the conclusions drawn within the broader Environmental Impact Assessment. According to the evidence, where the initial assessments concerning landscape, heritage, and socio-economic factors have understated the effects, this underestimation propagates through to the cumulative assessment. Consequently, the baseline from which cumulative impacts are measured is already diminished, leading to an inaccurate foundation for further evaluation.

Because the cumulative assessment builds upon this flawed baseline, the combined effects of the proposed development alongside other existing, consented, and foreseeable projects are similarly understated. This reliance on reduced initial assessments results in a cumulative impact evaluation that fails to capture the true scale of potential adverse effects. Therefore, the assessment cannot be considered reliable or comprehensive in its current form.

There remains significant uncertainty regarding the applicant's compliance with key planning policies and environmental regulations, specifically concerning project splitting and the assessment of cumulative effects. The proposal fails to demonstrate that the cumulative and in-combination effects, as well as the overall impacts of the project, have been reliably identified and assessed in accordance with GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the EIA Regulations. This lack of clarity undermines confidence in the environmental impact appraisal and the robustness of the decision-making process.

Furthermore, the applicant has not explicitly addressed how deferred works will be treated within the determination, leaving a critical gap in the evaluation of potential adverse effects. It is essential that these deferred elements receive explicit consideration to ensure full compliance with statutory requirements and to provide decision-makers with a comprehensive understanding of the project's total impact. In light of these shortcomings, it is requested that the treatment of deferred works be expressly addressed before any approval is granted.

1.1.326 Public Engagement, Site Selection and Environmental Information

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

Furthermore, a detailed examination of the environmental information reveals significant shortcomings that compromise its adequacy. The landscape assessment,

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

1.1.327 Effects on Local Area

There remains considerable uncertainty regarding the adequacy of the applicant's assessment of the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Although Islay and Colonsay lie closest to the development area—which extends over 448 square kilometres immediately north-west of Islay and west of Colonsay—the application primarily considers Islay in terms of its potential as a direct project location. This approach neglects a thorough place-based evaluation of the effects on Islay's Atlantic-facing communities, who confront the nearest edge of the development area and whose setting, economic activities, and community life are likely to be materially affected. Similarly, for Colonsay and Oronsay, the seaward outlook integral to daily life directly faces the proposed array. The North Colonsay and Western Cliffs Special Protection Area, forming Colonsay's coastline, is central to the applicant's derogation case and compensation plan, implicitly acknowledging that harm to the internationally protected seabird population of these cliffs cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance within this community, is subject to the same deficiencies identified elsewhere in the heritage assessment, particularly concerning the appraisal of its open maritime setting. Taken together, these points demonstrate that the applicant's evaluation underestimates the potential adverse impacts on these island communities and their heritage assets, thereby undermining the reliability of the overall environmental and heritage impact assessment.

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

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

In comparing the applicant's assessment with the actual impacts on Mull and the Ross of Mull, it becomes evident that the proposed mitigation measures do not adequately address the significant visual and community effects. While the applicant acknowledges significant effects at locations such as Erraid, on the Core Paths of the Ross, and at Fionnphort—the gateway to Iona and a vital point for visitor embarkation—these admissions highlight only a portion of the wider impacts experienced by these coastal communities. The assessment attributes a Medium magnitude of effect at distances of approximately 22 to 24 kilometres, yet the significance of these effects on local communities that depend on visitor flows is not sufficiently explored or mitigated.

Moreover, across Mull itself, the applicant concedes significant effects on Core Paths and within Local Landscape Areas including Central, South, and West Mull. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is correctly identified as having High sensitivity at distances ranging from 21 to 33 kilometres. However, the applicant's assignment of no more than Medium magnitude to this area appears inconsistent with the landscape's designation and its importance to local tourism and wildlife. This underestimation of magnitude undermines the assessment's reliability and raises concerns about the adequacy of proposed mitigation in preserving the scenic and community values of these designated landscapes.

Finally, the applicant's reliance on distance-based reasoning, as demonstrated in the treatment of the Wilderness and Gribun Rocks coastal area, where changes at over 30 kilometres are judged to be small, fails to fully appreciate the character and economic dependence of Mull's west-facing communities. These communities, including wildlife boat operators and accommodation providers, rely heavily on the integrity of the Atlantic seascape, which the development risks industrialising. Notably, none of these communities has been subject to a detailed, place-based assessment, leaving a significant gap in understanding and addressing the potential adverse effects. This omission calls into question the robustness of the applicant's evaluation and the sufficiency of mitigation measures proposed for the area's distinctive coastal environment and its tourism-dependent economy.

The applicant's assessment underestimates the practical consequences for important designated landscapes and vulnerable island communities, notably by omitting any consideration of Ulva. This island, situated within the Loch na Keal National Scenic Area, is a small, community-owned settlement at the outset of regeneration. Its recovery is closely tied to the preservation of its natural setting and unspoilt seascape, yet the applicant has made no assessment of effects on Ulva's unique qualities, thereby overlooking critical factors that support the community's viability and cultural identity.

Similarly, the treatment of other designated landscapes appears insufficiently rigorous. Staffa, another island within the Loch na Keal National Scenic Area and renowned across Europe, lies approximately 35 kilometres from the development area—beyond the 30 kilometre limit suggested by NatureScot for assessing effects on National Scenic Area qualities. Despite the applicant's recognition of the panoramic maritime qualities of Staffa, it concludes that the scale of change would be small and the effect not significant. The Jura National Scenic Area, assessed at about 28 to 32 kilometres distance and of high sensitivity, is attributed only a medium to low magnitude of effect, justified by distance and retained landforms, even though its designation fundamentally depends on its wild, undeveloped Atlantic character. The Scarba, Lunga and the Garvellachs National Scenic Area, located some 35 to 40 kilometres away, receives comparable treatment. Collectively, these assessments appear to downplay the potential impacts on the natural and cultural qualities that underpin these designated landscapes and island communities.

The applicant's assessment categorises the South Tiree coastal area as having High sensitivity at an approximate distance of 35 kilometres, yet concludes a Low magnitude of change resulting from the proposed development. This juxtaposition of high sensitivity with low impact magnitude appears incongruous, particularly given the distinctive environmental context of Tiree. The island's exceptional low-lying topography, with its highest elevation at Ben Hynish reaching only 141 metres, underpins a landscape character dominated by expansive sea and sky. Such a setting is inherently sensitive to vertical intrusions.

Given that the proposed turbines would reach heights of up to 335 metres, more than twice the island's highest natural point, their introduction would constitute a profound alteration to Tiree's open oceanic horizon. This scale of vertical structure is without precedent in the seascape and, accordingly, the applicant's conclusion of a Low magnitude of change does not adequately capture the likely visual and experiential impacts. The assessment thus significantly understates the magnitude of change and impact on Tiree's sensitive and distinctive landscape character, leading to an unreliable evaluation of effects.

While the applicant's assessment applies distance-based moderation to mitigate perceived effects on seascape receptors, this approach overlooks significant impacts on mainland and island communities that have direct visual and economic connections to the development area. For instance, Gigha, a community-owned island renowned nationally for its regeneration, faces the development from the east; yet, the effects on its delicate community balance and local economy have not been examined. Similarly, Ardnamurchan Point—the westernmost tip of the British mainland—offers panoramic views along the Hebridean seaboard, attracting visitors

throughout the peninsula. These seaward panoramas represent precisely the receptors that the distance-based mitigation seeks to moderate, calling into question the adequacy of such an approach. Furthermore, the chain of communities along the west coast of Kintyre, whose identity and visitor economy are closely tied to the open Atlantic seaboard facing Islay, Jura, and adjacent waters, along with the Treshnish Isles and other small islands and mainland coasts viewing the development area, have not been fully accounted for. Taken together, these omissions indicate that the applicant's assessment lacks the necessary comprehensiveness regarding the effects on these sensitive and economically reliant communities.

The applicant's environmental impact assessment systematically moderates and discounts effects on sensitive receptors located beyond approximately 20 kilometres, a practice that contrasts with more precise, place-based mitigation approaches applied within closer proximities. This distance-based methodology effectively reduces the perceived magnitude of change and downplays the significance of impacts on distant communities. Consequently, the assessment fails to apply tailored mitigation measures that reflect the actual sensitivity and lived experience of those receptors, undermining the robustness of the proposed environmental protections.

Critically, the evidence demonstrates that wherever a highly sensitive receptor exists beyond this 20-kilometre threshold, the magnitude of change is consistently moderated and the effect discounted, yet no place-based assessment is provided for these communities. This omission means that those living with potentially significant effects have not had their specific circumstances properly evaluated, resulting in an incomplete and potentially misleading appraisal of environmental consequences. Such systematic discounting beyond 20 kilometres therefore compromises the integrity and comprehensiveness of the environmental impact assessment as a whole.

1.1.328 Personal Observations

In addition to the planning matters above, I am personally concerned because: I am a wildlife safari guide and travel throughout the Highlands and Islands. I believe that this proposed development will severely harm the wildlife of the area and by extension, the businesses that rely on it. Tourism to the Highlands and Islands relies heavily on the unspoilt and unindustrialised landscapes and this wind farm will have a very negative impact.

Finally, I would also ask the Scottish Ministers to consider: I urge Scottish Ministers to reject this development completely.

1.1.329 Summary

The proposal for the MachairWind Offshore Wind Farm fails to demonstrate compliance with the relevant statutory and policy frameworks governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities of the coastal area. However, published analyses of the applicant's documentation reveal that these impacts have been understated. Moreover, the necessary heritage assessment has not been conducted. While effects on the island communities

affected by the project were identified, they were never subjected to proper assessment. Ecological requirements, as prescribed by relevant tests, have not been shown to be achievable. Additionally, the application before the Scottish Ministers includes only a portion of the overall project.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to decline the associated marine licence. Should the Ministers consider not refusing the application outright, I request that further environmental information be sought and that enhanced visualisations be provided. Furthermore, determination of the applications should be deferred until after a public inquiry, allowing thorough examination of the issues raised in this objection. Regardless of the decision taken, I also request that the Ministers explicitly address and state their conclusions regarding the effects on cultural heritage and on the impacted island communities within their reasons.

Yours faithfully,

[Redacted]

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

Member of the public 535
Dear Sir/Madam,

I wish to formally register my objection to the proposed MachairWind Offshore Wind Farm, which is currently the subject of two applications: application number 00012385 seeking consent under section 36 of the Electricity Act 1989, and application number 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications have been submitted by MachairWind Limited, trading as ScottishPower Renewables. I request that this communication be accepted as an official objection, that I be recorded as an objector, and that I receive notification of the outcome of these applications.

The project proposes an offshore wind farm with a generating capacity of approximately 2 gigawatts. This would involve the installation of between 91 and 144 wind turbines, each reaching up to 335 metres in height to blade tip. The development is planned within a designated Windfarm Development Area covering around 448 square kilometres of marine space situated north-west of the island of Islay and west of Colonsay. The site lies approximately 21 kilometres from Iona and is in close proximity to other islands and coastal communities within the southern Hebrides.

My objection is grounded in planning and environmental considerations, which are addressed within the statutory and policy frameworks governing the determination of these applications. It is important to emphasise that the onus lies on the applicant to provide comprehensive and compelling evidence demonstrating that all relevant legal and policy tests have been met. Objectors, including myself, are not obliged to establish the contrary. Based on the following detailed reasons, I conclude that the applicant has failed to meet this evidential burden, and therefore consent should be withheld.

1.1.330 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989, which requires the applicant to have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant must take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The evidence provided does not show that these requirements have been adequately addressed. As the Scottish Ministers are also required to have regard to these statutory duties in determining the application, the absence of demonstrated compliance, alongside identified deficiencies and omissions, constitutes a material conflict with the applicable legal and policy framework. Consequently, these failures weigh decisively against the granting of consent.

The marine licence application fails to comply with the statutory requirements set out in Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland’s National Marine Plan, thereby warranting refusal of consent. Authorisation decisions under the Act must be taken in accordance with the National Marine Plan unless relevant considerations indicate otherwise. In this case, the application does not

demonstrate compliance with key General Policies, including GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts). These policies are integral to the statutory assessment process.

The absence of demonstrated compliance with these policies constitutes a material deficiency in the application. Where evidence identifies such deficiencies, omissions, or conflicts with the applicable legal and policy framework, these matters must weigh against the granting of consent. Given the failure to meet these statutory and policy requirements, the application does not satisfy the conditions necessary for lawful authorisation under the Marine (Scotland) Act 2010 and the National Marine Plan. Consequently, the marine licence should not be granted.

The proposal fails to comply with key policies of National Planning Framework 4, specifically Policies 3, 4, 7, and 11, which address biodiversity, natural places, historic assets, and energy. This non-compliance represents a significant material consideration that weighs heavily against the granting of planning consent. The statutory duties and legislative requirements that underpin these policies have not been adequately met, undermining the legal and policy framework essential to the proper determination of this application.

The evidence clearly identifies deficiencies and omissions in the applicant’s submission with respect to demonstrating compliance with these policies. There is a failure to provide sufficient information or assessment to satisfy the requirements of Policy 3 on biodiversity and Policy 4 on natural places, as well as Policy 7 concerning the protection of historic assets and places. Furthermore, the proposal does not meet the standards set out in Policy 11 on energy, leaving critical aspects unaddressed. These shortcomings amount to a breach of the statutory and policy framework that must be applied in decision-making.

Given the absence of demonstrated compliance and the presence of clear conflicts with the applicable legal and policy framework, the proposal cannot be considered acceptable in planning terms. As established by National Planning Framework 4 and reiterated in the supporting evidence, such failures weigh decisively against the granting of consent. Accordingly, the application should be refused on the basis that it does not meet the essential requirements of the relevant policies and statutory duties.

The application must be refused because it fails to comply with the mandatory requirements for environmental impact assessment and habitats regulations assessment as set out in law. Under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, the applicant is required to identify, assess, and report the likely significant environmental effects of the proposal prior to any determination. This statutory obligation has not been fulfilled, as the evidence demonstrates that the environmental impact assessment is inadequate and incomplete.

Furthermore, the Habitats Regulations impose a clear duty to assess the effects of the proposal on European protected sites in accordance with the applicable statutory tests. The submitted documentation does not provide sufficient evidence to demonstrate compliance with these requirements. There are significant deficiencies and omissions in the habitats regulations assessment, leaving the potential impacts on protected sites unquantified and unmitigated.

Where compliance with these legal frameworks has not been demonstrated, and where the evidence reveals deficiencies, omissions, or conflicts with the applicable legal and policy framework, these failures must weigh decisively against the granting of consent. In this case, the absence of a robust and compliant environmental impact assessment and habitats regulations assessment constitutes a fundamental procedural and evidential defect that precludes lawful approval of the proposal.

The proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018. This statutory requirement is clear that the interests of island communities must be explicitly taken into account and given due weight in the decision-making process. The absence of such consideration undermines the legal compliance of the application.

The submitted evidence does not demonstrate adherence to this statutory duty. There are identifiable deficiencies and omissions in addressing the specific needs and circumstances of island communities, which the Act requires to be integral to the assessment. This failure constitutes a direct conflict with the applicable legal and policy framework governing development proposals affecting island areas.

Given these shortcomings, the proposal cannot be regarded as compliant with the Islands (Scotland) Act 2018. Where such compliance is not demonstrated, the legislation and associated policy clearly indicate that these matters must weigh against the granting of consent. Accordingly, the application should be refused on this basis.

The applicant has failed to discharge the fundamental responsibility to demonstrate compliance with all relevant legal and policy requirements, which is a prerequisite for the granting of planning consent. It is an established principle that the onus lies squarely on the applicant to provide robust, objective, and proportionate evidence confirming that every applicable statutory duty, planning policy, and environmental assessment requirement has been fully satisfied. In this case, the submitted evidence does not meet this evidential burden.

Specifically, the application documentation lacks sufficient proof that all statutory duties have been observed, and it fails to establish conformity with the relevant planning policies and environmental assessment obligations. The absence of such demonstrable compliance is not a mere procedural oversight but a substantive deficiency that undermines the legitimacy of the application. Furthermore, where the evidence does highlight deficiencies, omissions, or conflicts with the applicable legal and policy framework, these shortcomings must be regarded as material considerations weighing decisively against the proposal.

Given that the applicant has not fulfilled the necessary evidential requirements to prove compliance, and that the available evidence identifies clear conflicts and omissions, the application cannot be considered to have met the statutory and policy tests required for consent. Therefore, the proposal should be refused on the basis that the applicant has not discharged the burden of proof to demonstrate lawful and policy-compliant development.

1.1.331 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to comply with the impact criteria outlined in NPF4 Policy 11, resulting in significant adverse consequences for both the environment and local communities. Although Policy 11 supports renewable energy development, this support is conditional and must operate within the constraints of specific impact assessments, notably those addressing effects on communities, landscapes, seascapes, and other sensitive receptors.

In particular, the proposal would cause substantial harm to nationally designated landscapes and seascapes, undermining their protected status. Additionally, there is insufficient evidence to demonstrate that the cultural significance of scheduled monuments and their settings would be preserved. The safeguarding of island communities has not been adequately addressed, raising concerns about the social implications of the development. Furthermore, the ecological assessments provided do not convincingly show that the necessary environmental tests can be met.

Given these unresolved issues, the proposal conflicts directly with the requirements of NPF4 Policy 11. It cannot be supported as it stands, since the adverse impacts on heritage, landscape, community, and ecology run counter to the policy's intended balance between renewable energy advancement and environmental protection.

The proposal fails to comply with multiple National Planning Framework 4 policies designed to protect nationally important landscapes, heritage assets, and biodiversity, resulting in significant adverse consequences. Specifically, it conflicts with Policy 11, which operates alongside Policy 4(c) and 4(d) protecting National Scenic Areas and nationally important landscapes from substantial harm to the qualities for which they are designated. Furthermore, it does not satisfy Policy 7, including 7(h) concerning scheduled monuments and Policies 7(c) and 7(d) on the setting of historic assets. Additionally, the proposal falls short of Policy 3's requirements on biodiversity protection. The evidence demonstrates that the development would cause significant adverse effects on nationally designated landscapes and seascapes. It has not been adequately shown that the cultural significance of scheduled monuments and their settings would be preserved, nor that island communities would be safeguarded. Crucially, the ecological assessments and tests required by these policies have not been proven to be met based on the submitted evidence. Consequently, the proposal is incompatible with these key NPF4 policies safeguarding designated assets.

The assessment finds that the proposal is in clear conflict with the terrestrial development plan framework, notably the Argyll and Bute Local Development Plan 2. This conflict arises because the proposal would adversely affect the landscape, heritage, and community interests that these policies are specifically designed to

protect. Given this, the proposal does not accord with the development plan framework nor with National Planning Framework 4 when considered as a whole. Furthermore, the applicant has not provided sufficient evidence to demonstrate otherwise. Therefore, it is concluded that the proposal is inconsistent with the relevant land-based planning policies and should not be supported.

1.1.332 Seascape, Landscape and Visual Effects

There is notable uncertainty regarding the applicant's assessment methodology, particularly in relation to distance thresholds beyond which major effects are considered to cease. The methodology outlined in Appendix 16.1 does not specify any such distance threshold, yet independent analysis of the applicant's Chapter 16 and accompanying appendices reveals a clear pattern: no highly sensitive receptor beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of its sensitivity or the extent of visibility.

The applicant's own documentation further illustrates the influence of distance on the assessment outcomes. For instance, an evaluation of a coastal area situated over 30 kilometres from the site concludes that the scale of change is small due to the viewing distance. Additionally, the Landscape Character synthesis categorises magnitude as High within about 20 kilometres, Medium between roughly 20 and 30 kilometres, and Low beyond approximately 30 kilometres for certain landscape types. This approach inherently moderates the perceived impact with increasing distance.

Such systematic moderation of magnitude at distances where some of the most sensitive designated landscapes are located raises significant concerns. The protective tests applied rely on these understated inputs, leading to conclusions that may not accurately represent the true effects the Scottish Ministers are being asked to consider. This undermines the reliability of the assessment and warrants careful scrutiny.

While the visualisation materials submitted in support of the application follow NatureScot's established guidance, it is important to recognise their inherent limitations when compared to the actual experience of mitigation on site. Printed visualisations, including the wireline drawings incorporated within panoramic projections, are unable to replicate fully the scale and spatial relationships perceived by a viewer in the field. These technical renderings, rather than serving as independent corrections, function as components within the overall visualisation and therefore share its constraints in conveying an accurate sense of presence and impact.

This acknowledgement of technical and perceptual limitations suggests that reliance on such visual evidence alone may underrepresent the true extent of visual effects experienced locally. Consequently, a cautious approach is necessary when interpreting these materials, ensuring that any mitigation measures are evaluated not only through the lens of these visualisations but also through on-site assessments and other complementary forms of evidence. This balanced consideration will support a more robust understanding of the development's visual impact and the effectiveness of proposed mitigation.

The applicant's evidence acknowledges that the proposed development will introduce aviation and navigation lighting to a sea horizon that is currently unlit, thereby permanently altering the character of the night-time seascape throughout its operational life of 35 years. This change represents a significant visual impact, as the existing natural darkness will be replaced by artificial illumination, fundamentally transforming the nocturnal environment of the seascape.

Furthermore, the temporal limitation of 35 years does not diminish the policy implications of such harm. Consent for this development effectively constitutes a determination that the seascape is appropriate for wind farm use, thereby establishing a precedent for the acceptability of such character alterations within this marine setting. This has enduring consequences for the protection of seascape character and must be carefully weighed in the decision-making process.

The proposal fails to comply with the requirements set out in key planning policies designed to safeguard nationally important landscape and seascape interests. Specifically, the identified effects engage National Planning Framework 4 (NPF4) Policies 4(c) and 4(d), 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively establish a clear framework for the protection and sustainable management of such sensitive environments.

Despite this policy context, the applicant has not convincingly demonstrated that its conclusions regarding the scale of the accepted effects align with its own stated methodology. This gap undermines confidence in the assessment's reliability and casts doubt on the extent to which the proposal respects the integrity of the protected landscapes and seascapes. Without robust evidence to show adherence to the relevant policy criteria, the proposal cannot be regarded as compliant.

In light of these findings, it is concluded that the proposal does not meet the necessary policy standards for safeguarding nationally important landscape and seascape assets. Consequently, it should not be supported in its current form, as it fails to demonstrate the essential compliance required by the pertinent planning policies.

1.1.333 Cultural Landscape, Archaeology and Historic Environment

The application engages National Planning Framework 4 (NPF4) Policy 7(h) concerning scheduled monuments, as well as Policies 7(c) and 7(d) relating to the setting of heritage assets, together with GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. These provisions collectively establish a rigorous framework intended to ensure that the cultural significance of heritage assets, particularly those of international and national importance, and their settings are duly protected in the planning process.

However, the applicant has failed to demonstrate that such protection will be secured. There is a conspicuous absence of a comprehensive assessment to confirm that the cultural significance of these heritage assets and their settings will not be compromised. Consequently, the Scottish Ministers do not have before them the necessary evidence to conclude that the application complies with the relevant heritage protection policies. This deficiency undermines the acceptability of the

proposal in terms of its compliance with policy requirements for safeguarding heritage assets.

1.1.334 Effects on Island Communities, Tourism and the Local Economy

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

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

The applicant's own consultants acknowledged habitability as a potentially significant pathway through which the proposal could affect island communities; however, no assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 focuses on regional-level analysis, examining potential port communities in detail, yet it fails to conduct any equivalent place-based assessment of the island communities directly facing the development. Despite this omission, the assessment nevertheless concludes that these island communities exhibit low sensitivity to tourism effects.

This approach is fundamentally flawed. Small island economies are not adequately represented by regional averages, as their economic activity is concentrated in sectors most vulnerable to changes in the very qualities that attract visitors. Furthermore, an increased reliance on visitor numbers does not diminish this sensitivity; rather, it intensifies dependence on those qualities at risk. Therefore, the conclusion of low sensitivity, reached without any place-specific analysis, cannot be regarded as evidence but instead represents an unfounded assumption. Consequently, the socio-economic assessment methodology is insufficient to understand or mitigate the potential impacts on island communities.

The proposal fails to comply with the relevant policy and statutory duties concerning island communities. Specifically, it does not satisfy the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions affecting such communities be founded on robust socio-economic evidence and adopt a precautionary approach when evidence is insufficient. Furthermore, it disregards the provisions of NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, all of which emphasise the necessity of assessing and affording appropriate weight to the interests of island communities through meaningful engagement from the earliest stages of development to its conclusion.

The applicant has acknowledged that island communities warrant particular scrutiny; however, it has failed to undertake the necessary assessments to properly understand the effects of the proposal on these communities. Without such assessments, there is no demonstration that the proposal is compatible with the sustainability of island communities. This omission is significant, as it undermines the ability to ensure that the development will not adversely affect the social and economic well-being of those communities.

In light of these considerations, it is evident that the statutory duties owed to island communities have not been discharged. The absence of adequate evidence and engagement means that the proposal cannot be considered compliant with the established policies and statutory requirements designed to protect island communities. Consequently, the proposal should not be supported.

1.1.335 Ecology, Biodiversity and Habitats Regulations

While mitigation measures may be proposed to reduce the environmental impact of the development, it is important to consider that Priority Marine Features and Annex I habitats are present within the development area itself. These habitats are known to be sensitive and of high ecological value, and their presence indicates that the site supports a complex and potentially vulnerable marine ecosystem.

Furthermore, the surrounding waters are home to seabirds, marine mammals and basking sharks, species that are often protected due to their conservation status and ecological importance. The scale of the proposed construction, operation and decommissioning activities, which would take place over several decades, raises significant concerns about the potential for long-term adverse effects on these habitats and species. Given this context, the ecological importance and sensitivity of the site and its environs must be carefully weighed against the proposed development, as the potential for significant environmental harm is substantial.

The applicant’s submission of a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan signifies an acknowledgement of potential adverse effects on the North Colonsay and Western Cliffs Special Protection Area, specifically concerning the guillemot population. Such documents are customarily prepared in circumstances where an adverse effect on site integrity cannot be definitively ruled out. This approach indicates that the applicant recognises the possibility that the Scottish Ministers may reach a different determination regarding adverse impacts than the applicant themselves. Consequently, these submissions serve as an important component of the application, intended to address and mitigate potential impacts under the relevant derogation provisions.

The applicant’s evidence clearly establishes that under the Habitats Regulations, consent for developments potentially impacting protected habitats and species can only be granted when the competent authority has ascertained that the proposal will not adversely affect the integrity of the protected site. This requirement is absolute unless the strict derogation tests are satisfied. Crucially, consent may lawfully be granted only where no reasonable scientific doubt remains regarding the absence of adverse effects. The evidential burden lies with the applicant to demonstrate this to

the requisite standard. Importantly, proposals for mitigation, compensation, or future monitoring, while relevant, do not in themselves satisfy the statutory tests or guarantee lawful consent.

This legal framework is reinforced by specific policy provisions, including GEN 9 and GEN 13 of the National Marine Plan, alongside Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). Together, these policies embed the stringent requirements of the Habitats Regulations within the planning system, ensuring that developments affecting designated sites are rigorously assessed. The high evidential threshold and comprehensive policy context emphasize the necessity for applicants to provide robust, conclusive scientific evidence demonstrating no adverse impact before consent can be lawfully granted. This ensures the protection of sensitive ecological interests in accordance with statutory and policy mandates.

The applicant's submissions, including their own derogation documents, fall short of demonstrating that the statutory tests designed to safeguard internationally important habitats and species are met. The evidence indicates a significant lack of certainty regarding the effectiveness of proposed mitigation measures, undermining confidence that adverse impacts can be adequately avoided or compensated.

Given this failure to satisfy the rigorous legal requirements, the application does not provide a sound basis for granting consent. Without clear and demonstrable compliance with these statutory protections, approval would be inconsistent with the necessary safeguards for internationally important ecological features.

1.1.336 Cumulative and In-Combination Effects

The applicant's evidence clearly demonstrates that only a portion of the project is currently before the Scottish Ministers, with critical components such as the export cable corridor and onshore transmission works deferred to future applications. These elements are indispensable for the operation of the wind farm, yet their impacts are not assessed in conjunction with the main development proposal. This segmentation prevents a comprehensive evaluation of the project's overall effects, as the cumulative impacts will be considered piecemeal through separate consenting processes that follow the principal decision. Such an approach is fundamentally flawed both legally and procedurally, as it contradicts the established principle, upheld in the Raeshaw Farms case, that a project must be assessed in its entirety rather than being artificially divided into smaller parts whose individual impacts may seem less significant. Consequently, the current assessment method undermines the integrity of the decision-making process by failing to provide a holistic understanding of the project's true environmental and planning implications.

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

cumulative impact assessment is compromised, leading to an overall underestimation of the true scale of combined effects.

The proposal, as presented, fails to adequately address the cumulative and in-combination effects of the development, which raises significant concerns regarding compliance with key planning and environmental requirements. Without a reliable assessment of the project as a whole, including deferred works, there is a risk that the full environmental impact has not been properly understood or mitigated. This omission may lead to unforeseen adverse consequences that could have been avoided through a more thorough evaluation.

This oversight constitutes non-compliance with established policies and regulations, specifically GEN 21 and paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the Environmental Impact Assessment (EIA) Regulations relating to project splitting. These frameworks require that projects be considered in their entirety to ensure that cumulative effects are fully captured and addressed. The applicant's failure to demonstrate adherence to these requirements undermines the integrity of the decision-making process and conflicts with national planning objectives.

In light of these concerns, it is essential that the determination explicitly considers the deferred elements of the project and their combined impacts. Only through comprehensive assessment can the decision-making authority ensure that the proposal complies with policy and regulatory standards, thereby safeguarding environmental interests and supporting sustainable development. It is requested that this issue be formally recognised and rectified before any approval is granted.

1.1.337 Public Engagement, Site Selection and Environmental Information

The consultation process for this application has been fundamentally compromised by significant deficiencies in public participation, directly affecting the legitimacy of the site-selection process. The applicant requests that Scottish Ministers place considerable weight on that process; however, the quality of engagement at both the plan and site-selection stages has been inadequate and has persisted into the application stage. Notably, the application itself comprises many thousands of pages of complex technical material, which local island communities have been expected to review within a consultation period coinciding with their busiest working months. This timeframe aligns with the visitor season, during which residents are continuously occupied and access to specialist advice is at its lowest. In contrast, the applicant has had years to prepare its case, supported by substantial professional expertise and financial resources, creating a marked imbalance in the ability to participate effectively.

Furthermore, the requirements of GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, mandate that those affected must be given a genuine and realistic opportunity to engage in decisions of this scale. The circumstances imposed upon the affected communities have not met this standard, constraining their ability to respond meaningfully. It is therefore imperative that Scottish Ministers take these shortcomings into careful consideration when assessing the representations made,

recognising that the process as it stands undermines the principles of fair and informed public involvement essential to sound decision-making.

The Environmental Impact Assessment (EIA) submitted with this application serves as the primary evidential foundation for the Scottish Ministers' determination. However, the critical issue is not the volume or extent of the assessment but its sufficiency in addressing potential significant effects comprehensively. The application identifies various pathways to significant environmental impacts but subsequently fails to investigate them fully or applies methodologies that do not substantiate the conclusions reached. For example, the landscape assessment relies on outcomes derived from a distance pattern that is not supported by its stated methodology. Similarly, the heritage assessment lacks demonstration of applying its own integrity test, and the socio-economic assessment omits any place-based analysis of the affected islands. These shortcomings indicate that the environmental information presented is incomplete and insufficiently robust to support a fully informed decision.

Furthermore, the application places undue reliance on future assessments, post-consent plans, monitoring measures, and additional approvals to address outstanding concerns. Such reliance is inconsistent with the requirements of the EIA Regulations, which mandate that likely significant effects must be understood and evaluated prior to determination. The Scottish Ministers are obliged to make their decision based solely on the evidence currently before them, rather than on assumptions that unresolved matters will be satisfactorily addressed at a later stage. In this context, the applicant has not demonstrated that the environmental information submitted meets the necessary adequacy standards for a proper assessment. Consequently, the EIA as presented fails to provide the Scottish Ministers with a sufficiently comprehensive evidential basis to support the granting of consent.

1.1.338 Effects on Local Area

The proposed development encompasses a substantial 448 square kilometre area immediately north-west of Islay and west of Colonsay, positioning these islands as the closest communities directly affected. Despite this proximity, the applicant's assessment notably underrepresents the impacts on Islay, treating it primarily as a potential project site rather than recognising the island's own communities whose Atlantic-facing settlements confront the nearest edge of the development. This approach omits a place-based evaluation of the effects on Islay's setting, local economy, and community life. Similarly, Colonsay and Oronsay, whose daily lives are intimately connected to their seaward outlook facing the array, face direct consequences. The North Colonsay and Western Cliffs Special Protection Area, integral to Colonsay's coastline, is central to the applicant's derogation case and compensation plan, implicitly acknowledging that harm to the internationally protected seabird populations there cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance located within this community, suffers from the same deficiencies identified elsewhere in the heritage assessment, particularly regarding the evaluation of its open maritime setting. Taken together, these omissions undermine the reliability of the environmental and heritage impact evaluation for these island communities.

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

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

The applicant's assessment acknowledges significant effects on key areas of Mull and the Ross of Mull, including the Ross of Mull South coastal area, where high sensitivity is identified at distances of approximately 22 to 24 kilometres, with a medium magnitude of impact. Notably, significant effects are accepted at Erraid and on the Core Paths of the Ross, as well as at Fionnphort, which serves as the principal gateway to Iona and the embarkation point for visitors. This community is directly connected to the flow of tourists, yet despite recognising the significance of these effects, the assessment does not extend to a thorough place-based evaluation of the impacts on these tourism-dependent communities. Similarly, across Mull, significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Area are accepted. The Loch na Keal National Scenic Area, covering Mull's western waters and islands, is assessed as highly sensitive at viewing distances of approximately 21 to 33 kilometres; however, the magnitude of impact is restricted to medium, a classification that may understate the true extent of potential harm to this nationally important landscape.

Furthermore, the applicant's reliance on distance-based reasoning is exemplified by the treatment of the Wilderness and Gribun Rocks coastal area. Here, the assessment concludes that the scale of change is small due to viewing distances

exceeding 30 kilometres, an approach that oversimplifies the visual and experiential effects on these sensitive coastal environments. This methodology overlooks the qualitative aspects of landscape character and the cumulative impact on communities whose economies are intimately tied to the Atlantic seascape. 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.

The applicant's assessment acknowledges the proximity of Ulva within the Loch na Keal National Scenic Area and recognises the shared effects on that designated landscape. However, it fails to consider the specific circumstances of Ulva as a community-owned island undergoing regeneration. This small, re-establishing community depends fundamentally on the unspoilt qualities of its setting and seascape, yet no dedicated assessment has been made to evaluate the potential impacts on its natural and cultural environment.

Similarly, Staffa, located approximately 35 kilometres from the development area and also within the Loch na Keal National Scenic Area, is dismissed as experiencing only small-scale change with no significant effect. This conclusion is reached despite the island's renowned panoramic maritime qualities, which the applicant's own assessment acknowledges. Notably, this distance exceeds the approximately 30-kilometre threshold recommended by NatureScot for assessing impacts on National Scenic Area qualities, raising concerns about the adequacy of the assessment methodology.

Other designated landscapes such as the Jura National Scenic Area, situated about 28 to 32 kilometres away, are assessed as having High sensitivity but only Medium to Low magnitude of impact, primarily justified by distance and retained landforms. This approach similarly extends to the Scarba, Lunga, and the Garvellachs National Scenic Area at 35 to 40 kilometres. However, these areas' designations rest heavily on their wild and undeveloped Atlantic character, which may be more vulnerable to change than the applicant's assessment suggests. Taken together, these considerations indicate that the potential effects on important seaboard landscapes and island communities may be underestimated, warranting a more thorough and nuanced evaluation.

The applicant's assessment concludes a Low magnitude of change for the South Tiree coastal area despite recognising its High sensitivity at a distance of approximately 35 kilometres. This practical consequence is significant, as it directly informs the reliability of the overall evaluation of effects on Tiree's landscape. By attributing a Low magnitude of change, the assessment risks underrepresenting the actual scale of impact experienced by receptors on Tiree, which in turn undermines the credibility of any subsequent mitigation measures or planning decisions based on this evaluation.

Tiree's distinctive landscape character is fundamentally shaped by its exceptional low-lying topography and the dominance of sea and sky, with its highest elevation at Ben Hynish measuring a mere 141 metres. In this context, the introduction of turbines reaching up to 335 metres would present vertical elements unprecedented in the island's seascape. Given this stark contrast, the conclusion of a Low magnitude of change appears incongruous and insufficiently reflective of the visual and experiential effects on such a sensitive receptor. This suggests a severe understatement of impact that warrants reconsideration to ensure that the assessment accurately captures the scale and nature of landscape effects on Tiree.

The applicant's assessment fails to consider significant effects on mainland and island communities that have direct visual and economic connections to the seascape impacted by the proposed development. This omission undermines the comprehensiveness of the environmental appraisal and risks overlooking adverse consequences for populations reliant on the coastal environment.

Gigha, a community-owned island celebrated nationally for its regeneration, faces the development site from the east. The finely balanced community and its economy, which depend substantially on the surrounding waters, have not been examined within the assessment. Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the receptors affected by the distance-based moderation approach contested in this representation.

Furthermore, the chain of communities along the west coast of Kintyre, whose character and visitor economy are defined by the open Atlantic seaboard views towards Islay, Jura, and adjacent waters, share comparable exposure. The Treshnish Isles and other small islands and mainland coasts with outlooks toward the development area are equally disregarded. Such omissions from the assessment leave a critical gap in understanding the full scope of the development's effects and should be addressed to ensure a robust and inclusive evaluation.

The applicant's environmental impact assessment employs a distance-based methodology that systematically moderates the magnitude of change and discounts the effects on highly sensitive receptors located beyond approximately 20 kilometres. This approach results in a significant underestimation of impacts, as it applies a generalized attenuation without accounting for the specific characteristics or vulnerabilities of the affected receptors. Consequently, the communities residing in these more distant locations have not been subjected to any detailed, place-based assessment, leaving a critical gap in the understanding of potential adverse effects.

This methodological limitation undermines the overall integrity and completeness of the environmental impact assessment. By failing to recognise and appropriately evaluate significant effects beyond the arbitrary 20-kilometre threshold, the applicant's approach neglects the nuanced realities of landscape sensitivity and community experience. Such systematic discounting risks the marginalisation of affected populations and compromises the robustness of environmental decision-making processes. It is therefore essential that assessments adopt a more nuanced

and receptor-specific approach to accurately capture and address the full extent of environmental impacts.

1.1.339 Personal Observations

Finally, I would also ask the Scottish Ministers to consider: Please conduct a full consultation with all affected communities and don’t destroy the beautiful landscape

1.1.340 Summary

The proposal submitted by the applicant fails to satisfy the statutory and policy requirements governing its determination. Notably, the applicant’s own assessments acknowledge substantial impacts on nationally designated landscapes as well as on the cultural heritage and communities along the coast. However, an analysis of the applicant's published documents reveals that these impacts have been consistently underestimated. Crucially, the necessary heritage assessment has not been conducted, and although effects on the island communities potentially affected were identified, no evaluation of these impacts has been undertaken. Furthermore, the ecological criteria set out for the project have not been demonstrated to be achievable. It is also important to note that only a portion of the overall development is currently before the Scottish Ministers for consideration.

In light of these deficiencies, it is respectfully urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm proposal, as well as decline the associated marine licence. Should the Ministers determine not to refuse, it is requested that the applicant provide additional environmental information accompanied by enhanced visualisations. Moreover, the applications should only be determined following a public inquiry, thereby enabling a thorough examination of the concerns raised in this objection. Regardless of the final decision, it is further requested that the Ministers explicitly address and conclude on the implications for cultural heritage and the island communities affected within their stated reasons.

Yours faithfully,

[Redacted]

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

Member of the public 536
Dear Sir/Madam,

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

The project in question seeks approval for an offshore wind farm with an installed capacity of approximately 2 gigawatts. It would comprise between 91 and 144 wind turbines, each with a maximum blade tip height of up to 335 metres. The proposed development site spans an extensive Windfarm Development Area of around 448 square kilometres, situated to the north-west of Islay and to the west of Colonsay. This location lies approximately 21 kilometres from the island of Iona and is in close proximity to the islands and coastal communities of the southern Hebrides.

This objection is founded upon a detailed consideration of the planning and environmental implications of the proposal, as evaluated against the statutory and policy framework governing the determination of such applications. It is incumbent upon the applicant to provide compelling and sufficient evidence demonstrating that all relevant tests and criteria are met. The onus of proof does not rest upon objectors to establish contrary positions. Having reviewed the submissions and associated evidence, it is clear that the applicant has failed to meet this burden. Consequently, consent for the MachairWind Offshore Wind Farm should be refused.

1.1.341 Legislative and Policy Framework

The marine licence application under Part 4 of the Marine (Scotland) Act 2010 fails to demonstrate compliance with multiple statutory requirements and key policies of Scotland’s National Marine Plan. Specifically, the application does not adequately address the General Policies GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts). These policies are integral to the statutory assessment process, and the absence of demonstrated compliance represents a significant procedural and evidential deficiency.

Given that the application has not met the required standards of evidence and policy adherence, and that these shortcomings constitute conflicts with the applicable legal and policy framework, the proposal must be weighed against the granting of consent. The failure to provide sound evidence and to properly engage with the cumulative impacts and historic and natural heritage considerations directly contravenes the statutory mandate for decision-making under the Marine (Scotland) Act 2010 and the National Marine Plan. Consequently, the application should be refused on these grounds.

The application fails to provide the requisite Environmental Impact Assessment (EIA) and Habitats Regulations Assessment (HRA) as mandated by law, thereby precluding any lawful determination in its favour. Under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations, it is a statutory requirement that the likely significant environmental effects of the proposal be identified, assessed, and reported prior to any decision. This procedural obligation has not been fulfilled.

Furthermore, the Habitats Regulations impose a clear duty to assess the effects of the proposal on European protected sites in accordance with the applicable statutory tests. The submitted documentation does not demonstrate compliance with these requirements. The absence of a comprehensive and legally compliant assessment means that the potential impacts on protected habitats remain unquantified and unmitigated.

Where compliance with these statutory duties has not been demonstrated, and where the evidence reveals deficiencies, omissions, or conflicts with the applicable legal and policy framework, such failings must weigh decisively against the granting of consent. In this case, the failure to conduct and present adequate EIA and HRA constitutes a fundamental procedural and substantive defect that invalidates the application and necessitates its refusal.

1.1.342 Seascape, Landscape and Visual Effects

The proposed development would introduce aviation and navigation lighting to a currently unlit sea horizon, resulting in a permanent alteration to the character of the night-time seascape throughout the stated 35-year operational life. This change represents a significant modification to the visual environment, as the existing natural darkness of the seascape would be replaced by artificial illumination that is visible from surrounding areas. The introduction of such lighting not only alters the aesthetic qualities of the seascape but also establishes a new baseline condition for the area’s nocturnal character during the lifetime of the project.

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

1.1.343 Cultural Landscape, Archaeology and Historic Environment

The applicant’s assessment fails to demonstrate compliance with the required methodology for evaluating the impact on the setting of historic assets, thereby undermining the reliability of its conclusions regarding heritage effects. Although the applicant adopts Historic Environment Scotland’s established methodology, which mandates an evaluation of whether changes to setting affect the contribution setting

makes to cultural significance and whether the integrity of setting is adequately retained, the assessment does not follow through on this crucial evaluative step. Instead, it focuses primarily on describing visual changes—considering factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—before asserting that the integrity of setting is adequately retained. A Methodological Audit, based solely on the applicant's Appendix 14.3, confirms that while heritage attributes are identified, there is no clear demonstration of how the integrity of setting has been assessed in accordance with the applicant's own accepted methodology. Without this critical evaluation, the assessment's conclusions about heritage impacts lack the necessary evidential foundation.

While the applicant's assessment acknowledges certain mitigation measures, it remains insufficient in addressing the broader cultural landscape and experiential qualities integral to the heritage assets. The baseline evidence itself recognises that the cultural significance derives not merely from isolated features but from dynamic qualities such as pilgrimage routes, arrival by sea, movement through a living cultural landscape, and the interrelationships between monuments, spirituality, and their surrounding landscape and seascape. These attributes are experienced primarily through movement rather than fixed viewpoints, underscoring the need for a more comprehensive approach to impact assessment. Furthermore, Historic Environment Scotland's consultation responses, as recorded within the application, explicitly request additional viewpoints to ensure these wider qualities are properly captured and represented. Consequently, the applicant's current assessment falls short of fully reflecting the cultural significance and experiential baseline, thereby limiting the effectiveness of proposed mitigation and the robustness of heritage impact evaluation.

The heritage impact conclusions presented rely heavily on the underlying landscape assessment, which, as identified, significantly understates the landscape effects. This understatement directly influences the credibility of the heritage conclusions, as they are built upon the initial landscape findings. When the extent of landscape impact is minimized, the subsequent evaluation of heritage implications is inevitably compromised.

Such dependence means that any deficiencies in the landscape assessment cascade into the heritage analysis, leading to an underestimation of potential harm to heritage assets. The interlinked nature of these assessments necessitates a robust and accurate appraisal of landscape effects to ensure that heritage impacts are properly understood and mitigated.

In light of this, the planning considerations should recognise that the current heritage conclusions lack a reliable foundation due to the understated landscape effects. Without rectifying these assessment shortcomings, confidence in the heritage impact findings remains fundamentally undermined.

1.1.344 Effects on Island Communities, Tourism and the Local Economy

The applicant's own baseline assessments acknowledge that the island communities affected by the proposed development rely heavily on visitors who are drawn specifically by the distinctive qualities of the area. These include the landscape,

seascape, cultural heritage, tranquillity and remoteness. Such attributes are fundamental to the visitor appeal and, by extension, the economic foundation of these island communities.

Any alteration to these intrinsic qualities directly undermines the economic base upon which these communities depend. This, in turn, jeopardises the provision of local services, threatens population retention, and ultimately compromises the long-term viability and sustainability of the island settlements. The proposal, therefore, poses a significant risk to the fundamental economic and social sustainability of these island communities.

There remains significant uncertainty regarding the adequacy of the applicant's socio-economic assessment methodology, particularly in its treatment of island communities directly affected by the proposal. While the applicant's own consultants have acknowledged habitability as a potentially significant pathway of impact, no specific assessment of island habitability was undertaken. Instead, Chapter 18 of the socio-economic assessment adopts a regional approach that focuses on port communities, neglecting a detailed, place-based evaluation of the island communities themselves. Despite this omission, the assessment nonetheless concludes that these island communities exhibit low sensitivity to tourism effects, a conclusion that appears unsupported given the absence of targeted analysis.

This methodological shortcoming is critical given the unique economic characteristics of small island communities. Their economies are not reflective of regional averages but are concentrated in sectors highly vulnerable to changes in the qualities that attract visitors. Moreover, their reliance on increasing visitor numbers serves not to mitigate sensitivity but rather to deepen dependence on the very environmental and social qualities potentially at risk from the proposal. Therefore, to assert low sensitivity without a rigorous, place-specific assessment is to rely on assumption rather than evidence. Such uncertainty fundamentally undermines confidence in the applicant's conclusions and suggests that the socio-economic impacts on island communities have not been adequately understood or mitigated.

1.1.345 Ecology, Biodiversity and Habitats Regulations

The proposed development would introduce extensive construction, operational, and decommissioning activities into an environment recognised for its ecological sensitivity, including Priority Marine Features and Annex I habitats present within the site. These activities would occur over several decades, representing a scale and duration of disturbance far exceeding typical mitigation capacities. While mitigation measures may be proposed to reduce impacts, the sheer magnitude and longevity of the development's footprint present a significant challenge to their effectiveness.

Furthermore, the surrounding waters serve as habitat for protected species such as seabirds, marine mammals, and basking sharks, all of which could be adversely affected by the development's activities. The presence of these species, alongside the Priority Marine Features and Annex I habitats, underscores the ecological importance of the area and the potential for significant adverse environmental effects. Given these factors, the proposal raises substantial concerns regarding its compatibility with the conservation of sensitive marine ecosystems.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically addressing the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are customarily prepared when an adverse effect on the integrity of a protected site cannot be definitively ruled out. Their submission constitutes a significant aspect of the application, acknowledging that, according to the applicant's own approach, Scottish Ministers may arrive at a different conclusion regarding potential adverse effects. This recognition underscores the applicant's awareness of the potential environmental impacts and their intent to address these through appropriate derogation provisions.

Consent for developments impacting protected habitats and species can only be lawfully granted if it is conclusively demonstrated that the proposal will not adversely affect the integrity of the designated site. This requirement means that no reasonable scientific doubt can remain regarding potential harm. The practical consequence is that any application must meet a very high evidential standard before consent is issued.

This strict legal framework is set out under the Habitats Regulations, which stipulate that consent is conditional upon either an absence of adverse effect or the fulfillment of stringent derogation tests. The responsibility for proving compliance rests firmly with the applicant. Importantly, proposals for mitigation, compensation, or future monitoring alone do not satisfy the statutory tests required for lawful consent.

In addition to the Habitats Regulations, this framework is supported by relevant provisions in GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. Together, these policies reinforce the necessity for rigorous scientific evidence and legal compliance in decision-making processes affecting protected sites.

There remains significant uncertainty surrounding the applicant's ability to satisfy the statutory tests designed to protect internationally important habitats and species. The evidence submitted, including the applicant's own derogation documents, clearly indicates that the level of certainty required by law has not been met. This fundamental gap undermines confidence that the proposed development would avoid causing unacceptable harm to protected ecological features.

Given this unresolved uncertainty, the application fails to demonstrate compliance with the stringent legal requirements intended to safeguard internationally important ecological assets. Without clear assurance that these statutory tests can be fulfilled, the balance must weigh against granting consent. It is therefore appropriate to refuse the application on the grounds that the necessary protections for these critical natural interests have not been convincingly secured.

1.1.346 Public Engagement, Site Selection and Environmental Information

The practical consequence of the deficiencies in public participation and consultation timing is a significant undermining of the legitimacy of the site-selection process. The applicant urges the Scottish Ministers to place substantial weight on this process; however, the inadequate opportunities for meaningful engagement at both the plan

and site-selection stages have persisted into the current application phase. The application itself encompasses thousands of pages of complex technical documentation, yet the consultation period coincided with the busiest months for island communities, a time when residents are fully occupied with continuous work during the visitor season and when access to specialist advice is particularly limited. This imbalance is stark, especially considering the applicant has had years of preparation supported by considerable professional and financial resources.

The National Marine Plan's guidance, specifically GEN 18, alongside the principles of effective public participation enshrined in the Aarhus Convention, establish that those affected by such decisions must have a genuine and realistic opportunity to engage. The conditions imposed on the island communities in this instance fall short of that established standard. This shortfall in meaningful engagement compromises the fairness and inclusiveness that underpin sound decision-making processes in matters of this scale and significance.

In light of these considerations, it is imperative that the Scottish Ministers give due weight to the inadequacies of the consultation process when evaluating the representations presented. Failure to adequately address these deficiencies would not only diminish public confidence in the planning system but also risk decisions being made without the full and fair input of those most directly affected. Therefore, the consultation process as it stands cannot be regarded as meeting the required standards of effective public participation.

The environmental information submitted with this application is insufficient for the Scottish Ministers to make a fully informed decision. The Environmental Impact Assessment (EIA), while comprehensive in scope, falls short of the required standard of sufficiency. Specifically, the assessment identifies potential pathways to significant effects but fails to investigate these thoroughly or employs methodologies that do not substantiate its conclusions. For example, the landscape assessment presents outcomes based on a distance pattern that is not supported by its own stated methodology; the heritage assessment lacks demonstrable application of its integrity test; and the socio-economic assessment omits any place-based analysis of the islands directly affected. Furthermore, the application frequently depends on future assessments, post-consent plans, monitoring, and additional approvals to address uncertainties, which conflicts with the EIA Regulations' requirement that likely significant effects must be understood prior to determination. Consequently, the Scottish Ministers are constrained to base their decision solely on the evidence currently before them, and the applicant has not shown that this environmental information meets the adequacy threshold necessary for proper determination.

1.1.347 Effects on Local Area

The applicant's assessment acknowledges Islay and Colonsay as the closest islands to the development area, which lies immediately north-west of Islay and west of Colonsay. However, the application predominantly evaluates Islay only as a potential project location rather than as a distinct island community subject to direct effects. Notably, the Atlantic-facing communities of Islay confront the nearest edge of a substantial 448 square kilometre development area, yet there is no place-based analysis of how this proximity might affect their setting, local economy, or community

life. This omission undermines the assessment's comprehensiveness in addressing the real and tangible impacts on Islay's residents.

Regarding Colonsay and Oronsay, the daily lives of these communities are intimately connected to their seaward outlook, which faces the development array directly. The North Colonsay and Western Cliffs Special Protection Area, situated along Colonsay's coastline, is central to the applicant's derogation case and compensation plan, implicitly acknowledging that harm to the internationally protected seabird populations cannot be ruled out. Furthermore, Oronsay Priory, a nationally important scheduled monument, lies within this community's area. The identified gaps in the heritage assessment similarly apply here, particularly concerning the treatment of the priory's open maritime setting. Taken together, these considerations demonstrate that the application underestimates the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, casting doubt on the reliability of the overall environmental and heritage impact evaluation.

The applicant's assessment of the visual and community impacts on Iona appears to underestimate the scale and significance of these effects when compared with the Coastal Character assessment and known sensitivities of the area. While mitigation measures are proposed, the Coastal Character assessment highlights that the Sound of Iona exhibits high sensitivity, with direct orientation towards the development and extensive visibility. The turbines would extend approximately 39 degrees across the horizon at a distance of around 21 kilometres, producing an overall effect described as Moderate and Significant. This broad geographical extent of change notably includes impacts on the ferry crossing between Fionnphort and Iona, an important community and visitor route, yet the applicant's visualisations do not encompass key viewpoints such as the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, despite Historic Environment Scotland's request for additional perspectives including from the ferry itself.

Furthermore, the West Coast of Iona is similarly assessed as highly sensitive, with widespread visibility of the proposed development. The applicant accepts that significant effects would occur for residents and visitors across much of the island, including at Dùn Ì, the highest point of Iona. The heritage significance of Iona's monastic landscape, encompassing the Abbey, the Nunnery and the high crosses, is internationally recognised and intrinsically linked to pilgrimage, arrival by sea and movement through the landscape. The applicant's baseline acknowledges this, yet the omission of certain visualisations and the limited assessment of experiential impacts call into question the completeness of the heritage impact evaluation. This is particularly important given the cultural and historic prominence of these sites and their relationship to views and approaches across the island.

In addition to these considerations, community response further challenges the adequacy of the assessment. A household consultation revealed that 92 per cent of respondents on Iona object to the proposal, indicating strong local concern. Crucially, the applicant's own consultants identified habitability as a potential pathway of effect on the island's community, yet no assessment of this impact appears to have been undertaken. The scale of the turbines can be contextualised by comparison with Ben Hynish on Tiree, a familiar landmark standing 141 metres tall and visible from Iona at approximately 33 kilometres. The largest turbines would

overtop Ben Hynish by around 194 metres while being located at roughly two-thirds of that distance, emphasising their imposing presence. Taken together, these points demonstrate that the applicant's evaluation underestimates the significant visual, community and heritage effects on Iona, thereby compromising the accuracy of the environmental and social impact assessment.

The applicant's assessment fails to adequately recognise the significant practical consequences for the communities and landscapes of Mull and Ross of Mull, particularly those reliant on tourism and the integrity of designated scenic areas. Notably, the Ross of Mull South coastal area, identified as having High sensitivity at distances of approximately 22 to 24 kilometres, is assigned only a Medium magnitude of effect. Despite this, the applicant acknowledges significant impacts at Erraid and on the Core Paths of the Ross, as well as at Fionnphort—an essential gateway to Iona and a focal point for visitor flow—yet no place-based assessment has been undertaken to address the direct community implications. Similarly, across Mull, significant effects are accepted on Core Paths and within the Central, South and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, of High sensitivity over distances of approximately 21 to 33 kilometres, is nonetheless attributed no greater than Medium magnitude, a conclusion that appears inconsistent with the area's recognised landscape importance. The applicant's reliance on distance-based reasoning is exemplified by the treatment of the Wilderness and Gribun Rocks coastal area, where effects are judged small solely because the viewing distance exceeds 30 kilometres, disregarding the qualitative nature of the seascape and its value. Crucially, the west-facing tourism economy of Mull, including wildlife boat operations and accommodation providers in its western townships, depends on the unindustrialised Atlantic seascape that would be altered by the development; yet, none of these communities has been subject to a specific, place-based impact assessment. In sum, the applicant's assessment materially underestimates the visual, economic and community effects on Mull and Ross of Mull's coastal landscapes and fails to provide the detailed, location-specific analysis necessary to inform a fully informed planning decision.

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

reflect the full significance of the visual and environmental effects on these designated landscapes and island communities, weakening the safeguards intended to preserve their distinctive character and vitality.

The applicant's assessment concludes a Low magnitude of change on the South Tiree coastal area despite recognising its High sensitivity at a distance of approximately 35 kilometres. This practical consequence is significant, as it directly affects the reliability of the overall evaluation of the development's landscape and visual impacts on Tiree. By underestimating the magnitude of change, the assessment risks providing decision-makers with an incomplete understanding of the true scale of effects on this sensitive area.

Tiree's distinctive landscape character is defined by its exceptionally low-lying topography and the dominance of sea and sky. The island's highest point, Ben Hynish, rises only 141 metres, underscoring the open and expansive oceanic horizon that shapes its sense of place. Introducing turbines up to 335 metres tall would create vertical structures of unprecedented scale within this seascape, fundamentally altering the visual experience and character of the island. Such a dramatic visual intrusion cannot reasonably be characterised as having a Low magnitude of change.

In light of these considerations, the applicant's conclusion exemplifies a severe understatement of the effects on Tiree. The assessment's failure to fully acknowledge the scale of visual and landscape impact on this highly sensitive receptor undermines the reliability of its findings. Consequently, the evaluation should be revisited to ensure that the distinctive and vulnerable character of Tiree is adequately protected in the planning process.

While the applicant's assessment applies distance-based mitigation to certain visual receptors, it fails to address significant effects on mainland and island communities whose seascape views and economic well-being are directly tied to the development area. For instance, the community-owned island of Gigha, celebrated nationally for its regeneration, faces the development waters from the east; yet, the impact on its delicate community balance and local economy remains unexamined. Similarly, Ardnamurchan Point—the westernmost tip of the British mainland—offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula, yet these important seaward panoramas are subject only to the distance-based moderation critiqued here. Moreover, the chain of communities along the west coast of Kintyre, whose outlook, character and visitor economy are shaped by the open Atlantic seaboard towards Islay, Jura and surrounding waters, alongside the Treshnish Isles and nearby mainland coasts, share this unassessed vulnerability. Consequently, the applicant's approach compromises the comprehensiveness of the assessment by omitting these key receptors, undermining confidence in its conclusions.

There remains a fundamental uncertainty in the applicant's environmental impact assessment arising from its reliance on a distance-based methodology that systematically moderates and discounts effects beyond approximately 20 kilometres. This approach inherently assumes that sensitive receptors located at greater distances experience diminished impacts, yet this presumption is not substantiated

by a place-specific analysis. Consequently, the assessment fails to adequately capture the true magnitude of change affecting these distant but highly sensitive communities.

Taken together, the evidence demonstrates a single proposition: wherever the applicant's assessment encounters a highly sensitive receptor beyond approximately 20 kilometres, the magnitude of change is moderated and the effect discounted, while the communities that live with those effects have received no place-based assessment at all. This systematic underestimation undermines the integrity of the environmental impact assessment and calls into question the robustness of its conclusions. In light of this, it is essential that the assessment be revisited to ensure that all significant effects, regardless of distance, are properly identified and evaluated.

1.1.348 Personal Observations

In addition to the planning matters above, I am personally concerned because: Shocked that such an area of cultural and environmental significance globally has been chosen to be a site

Based on my own local knowledge, I also wish to highlight that: The cultural heritage of Iona and surrounding area should not be ruined by large commercial investments and the impact on wildlife, vistas and seascape nit underestimated. Surely there must be other, less dramatically intrusive sites!

Finally, I would also ask the Scottish Ministers to consider: Why are you putting profit before environment and culture!

1.1.349 Summary

This proposal fails to satisfy the statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges significant adverse impacts on nationally designated landscapes, as well as on the heritage and communities along this coastline. However, published analyses of the applicant's documentation reveal that these effects have been understated. Notably, the necessary heritage assessment has not been conducted. Furthermore, while the effects on the island communities affected by the development were identified, no assessment of these impacts has been undertaken. The ecological tests required to meet statutory obligations have not been demonstrated as achievable. Compounding these issues, only a portion of the project is currently submitted for consideration by the Scottish Ministers.

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

Should the Ministers decide against refusal, it is requested that they require the submission of further environmental information alongside enhanced visualisations. The applications should then be determined only following a public inquiry, providing a forum where the concerns raised in this objection can be thoroughly scrutinised.

Moreover, it is sought that, irrespective of the outcome, the Ministers explicitly address and include in their decision the effects on cultural heritage and the impacted island communities.

Yours faithfully,

[Redacted]

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

Member of the public 537
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, detailed in application 00012385 seeking consent under section 36 of the Electricity Act 1989, and application 00012386 requesting a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These submissions, made by MachairWind Limited (ScottishPower Renewables), relate to a project involving approximately 2 gigawatts of installed capacity. The development envisions between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip, situated within a designated Windfarm Development Area spanning roughly 448 square kilometres of marine environment north-west of Islay and west of Colonsay. The site lies about 21 kilometres from Iona and in close proximity to various islands and coastal communities of the southern Hebrides.

I request that this correspondence be officially recognised as an objection, that I be recorded as an objector, and that I receive notification upon determination of these applications.

The grounds of my objection are anchored in planning and environmental considerations, assessed within the relevant statutory and policy context governing these applications. It is imperative to acknowledge that the evidential responsibility lies entirely with the applicant to substantiate that all applicable legal and policy criteria are met. Objectors bear no obligation to prove the contrary. Upon examination of the submissions and accompanying evidence, it is clear that MachairWind Limited has failed to satisfy this burden. Consequently, the applications should be refused consent on the basis outlined herein.

1.1.350 Legislative and Policy Framework

The application fails to demonstrate adequate mitigation of adverse effects as required under Schedule 9 of the Electricity Act 1989. Schedule 9 mandates that the applicant must have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Crucially, the applicant is also required to take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. Furthermore, the Scottish Ministers must have regard to these same statutory duties when determining the application.

In this case, the applicant has not demonstrated compliance with these statutory duties. The evidence identifies deficiencies and omissions in addressing the preservation and conservation requirements, as well as in the protection of relevant sites and features. There is a clear failure to show that reasonable mitigation steps have been taken to offset adverse impacts. Such shortcomings represent a conflict with the applicable legal and policy framework under Schedule 9.

Where compliance with these statutory duties is not demonstrated, the law requires that these matters weigh against the granting of consent. Accordingly, the application

should be refused on the basis that it does not adequately address the statutory duties under Schedule 9 of the Electricity Act 1989.

The marine licence application under consideration fails to demonstrate compliance with the statutory requirements set out in Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland's National Marine Plan. The application does not adequately address the General Policies that are critical to the assessment process, including GEN 4 on Co-existence, GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 and paragraph 4.85 on Cumulative Impacts. The absence of clear evidence demonstrating adherence to these policies undermines the statutory basis for authorisation and indicates significant shortcomings in the application's environmental and social impact assessments.

Moreover, the application exhibits deficiencies and omissions that conflict with the applicable legal and policy framework. The failure to provide sound evidence as required by GEN 19 and paragraph 4.81 is particularly concerning, as it impedes a robust and transparent evaluation of potential impacts. Similarly, the lack of adequate consideration of cumulative impacts, as mandated by GEN 21 and paragraph 4.85, raises serious doubts about the proposal's sustainability and its compatibility with the broader marine environment. These gaps in the application's documentation and analysis are not minor procedural oversights but fundamental flaws that weigh decisively against the granting of consent.

In conclusion, the marine licence application does not meet the statutory test of compliance with the Marine (Scotland) Act 2010 and the National Marine Plan policies. The identified failures to demonstrate conformity with key General Policies, coupled with evidential shortcomings and omissions, constitute substantial grounds for refusal. The statutory framework requires that authorisation decisions be made in accordance with the National Marine Plan unless relevant considerations indicate otherwise; here, no such considerations have been presented to justify departure from policy. Therefore, the application should be refused on the basis that it does not satisfy the legal and policy requirements governing marine licensing in Scotland.

The proposal fails to comply with key policies of National Planning Framework 4 (NPF4), which is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. Specifically, the application does not demonstrate compliance with Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy), all of which are directly engaged by this development.

The evidence confirms that where compliance with these policies has not been demonstrated, or where deficiencies, omissions, or conflicts with the applicable legal and policy framework exist, such matters weigh decisively against the granting of consent. In this case, the proposal's failure to address these critical policy requirements undermines the statutory and policy framework intended to protect biodiversity, natural environments, historic assets, and energy considerations.

Accordingly, the application should be refused on the basis that it does not meet the mandatory standards set out in NPF4, and the identified policy breaches constitute a clear and material planning objection.

The application fails to provide the requisite Environmental Impact Assessment (EIA) and Habitats Regulations Assessment (HRA) as mandated by law, thereby precluding any lawful determination in its favour. Under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations, it is a statutory requirement that the likely significant environmental effects of the proposal be identified, assessed, and reported prior to any decision. This procedural obligation has not been fulfilled.

Furthermore, the Habitats Regulations impose a clear duty to assess the effects of the proposal on European protected sites in accordance with the applicable statutory tests. The submitted documentation does not demonstrate compliance with these requirements. The absence of a comprehensive and legally compliant assessment means that the potential impacts on protected habitats remain unquantified and unmitigated.

Where compliance with these statutory duties has not been demonstrated, and where the evidence reveals deficiencies, omissions, or conflicts with the applicable legal and policy framework, such failings must weigh decisively against the granting of consent. In this case, the failure to conduct and present adequate EIA and HRA constitutes a fundamental procedural and substantive defect that invalidates the application and necessitates its refusal.

The Islands (Scotland) Act 2018 explicitly requires that the interests of island communities be considered and given due weight during the decision-making process. In this case, the proposal fails to demonstrate compliance with this statutory requirement. The evidence identifies clear deficiencies and omissions in addressing the specific needs and interests of the island communities affected. Such failures constitute a direct conflict with the applicable legal and policy framework established by the Act. Consequently, these shortcomings weigh decisively against the granting of consent for the proposal.

The applicant bears the responsibility of demonstrating, through robust, objective and proportionate evidence, that every relevant statutory duty, planning policy and environmental assessment requirement has been satisfied. This evidential burden is fundamental to the proper determination of the application and ensures that all legal and policy frameworks are fully complied with before consent is granted.

In this case, the applicant has failed to meet this burden. Compliance has not been demonstrated, and the evidence presented identifies deficiencies, omissions and conflicts with the applicable legal and policy framework. Such shortcomings weigh decisively against the granting of consent, as the absence of clear and comprehensive proof of compliance undermines the statutory and policy safeguards designed to regulate development proposals. Therefore, the application should be refused on the basis that the applicant has not fulfilled the necessary evidential requirements.

1.1.351 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to comply with the impact criteria set out in NPF4 Policy 11, resulting in significant adverse effects on nationally designated landscapes and seascapes. In particular, it does not demonstrate adequate protection of the cultural significance of scheduled monuments and their settings, nor does it show that island communities would be safeguarded. Furthermore, the ecological assessments required by the policy have not been sufficiently evidenced as capable of being met. Given that NPF4 Policy 11's support for renewable energy development is conditional upon satisfying its impact criteria—specifically those concerning communities (Policy 11(c)) and landscape, seascape, and other receptors (Policies 11(d) and 11(e))—the proposal's shortcomings undermine its compliance and therefore its policy support.

The proposal fails to demonstrate that mitigation measures would adequately address the significant adverse effects identified, thereby conflicting with several key policies within NPF4 that protect designated assets. Policy 11 operates in conjunction with Policy 4(c) and 4(d), which safeguard National Scenic Areas and nationally important landscapes from substantial harm to their defining qualities. Additionally, Policies 7 and 3 require the protection of scheduled monuments and their settings, alongside biodiversity interests. The evidence clearly indicates that the proposal would cause significant adverse effects on nationally designated landscapes and seascapes. Furthermore, it has not been shown that the cultural significance of scheduled monuments and their settings would be preserved. The safeguarding of island communities has also not been demonstrated, and the ecological criteria outlined in Policy 3 remain unmet based on the evidence submitted. In light of these considerations, the proposal does not comply with the relevant NPF4 policies aimed at conserving nationally important natural, historic, and ecological assets.

The applicant's evidence acknowledges that, in relation to terrestrial development plan policies, including those set out in the Argyll and Bute Local Development Plan 2, the proposal would have significant adverse effects. Specifically, it would detrimentally impact the landscape, heritage assets, and community interests that these policies are designed to safeguard. This demonstrates a clear inconsistency with the relevant development plan framework. Furthermore, when considered alongside National Planning Framework 4 in its entirety, the proposal remains contrary to established planning objectives. The applicant has not provided sufficient justification to overcome these conflicts, and as such, the proposal cannot be regarded as compliant with the terrestrial development plan framework governing land-based effects.

1.1.352 Seascape, Landscape and Visual Effects

The practical consequence of the applicant's assessment methodology is that it systematically underestimates the magnitude of landscape and visual effects at distances where the most sensitive designated landscapes are located. Despite the absence of any explicit distance threshold in the applicant's Appendix 16.1 beyond which major effects cease, the evidence demonstrates a consistent pattern across all three streams of assessment: no highly sensitive receptor beyond approximately 20

kilometres from the development area is attributed the highest magnitude of change, regardless of its inherent sensitivity or the extent of visibility. This pattern indicates an implicit distance-based moderation that is not transparently acknowledged in the methodology.

The applicant's own documentation further confirms the influence of distance in shaping judgements of effect magnitude. For example, an assessment of a coastal area over 30 kilometres away qualifies the scale of change as small, explicitly citing the viewing distance as a key factor. Similarly, the Landscape Character synthesis categorises magnitude as High within approximately 20 kilometres, Medium between roughly 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. These distance thresholds, while not formally stated in the methodology, effectively constrain the recognition of significant effects at greater distances, where important landscape receptors are situated.

As a result, the protective tests applied in the assessment process are based on understated inputs. By moderating magnitude values at distances coinciding with the location of the most sensitive designated landscapes, the conclusions drawn cannot be regarded as a reliable or accurate reflection of the true effects the Scottish Ministers are being asked to consider. This calls into question the robustness of the applicant's methodology and the validity of its predicted outcomes, undermining confidence in the decision-making process.

The introduction of aviation and navigation lighting as part of the proposed development would result in a permanent alteration to the character of the night-time seascape. Currently, the sea horizon remains unlit, and the addition of such lighting over the stated 35-year operational lifespan would fundamentally change this aspect of the environment. This practical consequence must be carefully weighed, as it represents a significant and ongoing visual impact that cannot be mitigated by the passage of time within the operational period.

Furthermore, the 35-year timeframe does not diminish the policy implications of this harm. Granting consent to this development effectively signifies that the seascape in question is deemed suitable for wind farm use despite these lighting effects. This policy position has long-term ramifications beyond the mere operational lifespan, as it establishes a precedent regarding acceptable impacts on seascape character. Consequently, the decision to permit the development must consider both the immediate and enduring consequences of introducing artificial lighting to an otherwise unlit marine environment.

The proposal fails to comply with key planning policies designed to safeguard landscape and seascape interests. Specifically, the effects of the development engage National Planning Framework 4 (NPF4) Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. The applicant has not demonstrated that its conclusions regarding the scale of these acknowledged effects align with its own established methodology. Furthermore, there is no evidence to show that the proposal meets the requirements of the policies protecting nationally important landscapes and seascapes. On this basis, the proposal does not accord with the relevant policy framework and should be refused.

1.1.353 Cultural Landscape, Archaeology and Historic Environment

The application fails to comply with essential policy requirements for the protection of heritage assets, rendering it unacceptable in its current form. Specifically, it engages National Planning Framework 4 (NPF4) Policy 7(h), which pertains to scheduled monuments, as well as Policies 7(c) and 7(d) concerning their settings, alongside GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Despite these clear policy obligations, the applicant has not demonstrated that the cultural significance of internationally and nationally important heritage assets and their settings will be safeguarded. Furthermore, the Scottish Ministers have not been provided with the necessary assessments to substantiate such a conclusion. In the absence of this critical evidence, the proposal cannot be deemed compliant with heritage protection policies and should therefore be refused.

1.1.354 Effects on Island Communities, Tourism and the Local Economy

There remains considerable uncertainty about the implications of the proposed development for the island communities concerned. These communities rely heavily on visitors whose presence is closely tied to certain distinctive qualities. According to the applicant's own baseline assessments, these include the landscape, seascape, cultural heritage, tranquillity and remoteness that define the area.

Any alterations to these essential qualities pose a direct threat to the economic foundations of these islands. Given the exceptional dependence on visitors, even modest changes could undermine local businesses and services that sustain residents. This in turn raises concerns about population retention and the broader social fabric of these communities.

It is therefore imperative to consider the proposal's potential impact on these fundamental attributes with great caution. The risk of destabilising the economic and social sustainability of island life should weigh heavily in the planning decision. Without assurance that these core visitor-attracting qualities will be preserved, the proposal threatens the ongoing viability of the islands themselves.

The applicant's own consultants acknowledge habitability as a potentially significant pathway through which the proposal could impact island communities, yet no assessment of the habitability of these affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 operates at a regional scale, focusing in detail on potential port communities while failing to provide an equivalent place-based analysis of the island communities directly facing the development. Despite this absence, the assessment concludes that these island communities exhibit low sensitivity to tourism effects.

This approach is fundamentally flawed, as small island economies are not accurately represented by regional averages. Their economies are highly concentrated in sectors most vulnerable to changes in the qualities that attract visitors. Moreover, reliance on increasing visitor numbers amplifies rather than mitigates this sensitivity, deepening economic dependence on the very attributes at risk. Therefore, the conclusion of low sensitivity, reached without any place-based analysis, lacks evidential basis and amounts to an unfounded assumption.

The proposal has failed to provide the necessary socio-economic evidence to quantify its impact on island communities, thereby falling short of the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan. These policies mandate that decisions must be founded on robust evidence and adopt a precautionary approach where data is insufficient. Furthermore, NPF4 Policy 11(c) alongside the Islands (Scotland) Act 2018 explicitly require that the interests of island communities are thoroughly assessed and meaningfully engaged with from the earliest stages through to the conclusion of the planning process.

Despite acknowledging the need for particular scrutiny of island communities, the applicant has not undertaken the comprehensive assessment required to understand the proposal's effects on these populations. This omission means that it remains unclear whether the development is compatible with the sustainability of island communities. The absence of this critical evaluation undermines confidence that the statutory duties owed to these communities, including proper consultation and consideration of their socio-economic wellbeing, have been discharged.

In light of these deficiencies, it is evident that the proposal does not meet the necessary planning and statutory standards for the protection and support of island communities. Without a clear demonstration that the interests of these communities have been given appropriate weight and that the proposal aligns with sustainable development principles, the application cannot be considered compliant with the relevant policies and legal obligations. Accordingly, this representation urges refusal on the grounds of non-compliance with policy and statutory duties regarding island communities.

1.1.355 Ecology, Biodiversity and Habitats Regulations

The proposed development poses a significant risk to the ecological integrity of the site and its surrounding waters due to the presence of Priority Marine Features and Annex I habitats within the development area. These habitats are of recognised conservation importance and are known to support a range of sensitive species, including seabirds, marine mammals, and basking sharks. The introduction of large-scale construction, operational, and decommissioning activities over several decades would inevitably disturb these species and their habitats, potentially resulting in substantial adverse environmental effects. Given the ecological sensitivity and the scale and duration of the proposed activities, the environmental risks associated with the development are considerable and warrant thorough reconsideration.

The applicant's submission includes a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan, specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are indicative of mitigation efforts, aiming to address potential adverse effects on a protected site. Their presence in the application suggests that the applicant acknowledges the possibility of significant impacts and has sought to propose measures intended to offset them.

However, it is important to note that such derogation and compensation documents are typically prepared for circumstances where an adverse effect on site integrity

cannot be ruled out. The mere submission of these plans reflects a recognition that the applicant's assessment does not definitively exclude harm to the protected population. This introduces a degree of uncertainty regarding the effectiveness of the proposed mitigation measures and whether they will fully prevent negative consequences.

Furthermore, the applicant's approach implies that the final determination on potential adverse effects rests with the Scottish Ministers, who may arrive at a different conclusion. Consequently, while the submitted documents demonstrate a willingness to engage with the derogation process, this does not guarantee that the proposals will satisfy the necessary statutory tests or that the protected site's integrity will be maintained. It remains essential that these considerations are given due weight in the planning decision.

The applicant acknowledges that under the Habitats Regulations, consent for developments affecting protected sites may only be granted where the competent authority has ascertained that the proposal will not adversely affect the integrity of the site, unless the stringent derogation tests are satisfied. It is emphasised that consent can lawfully be granted only where no reasonable scientific doubt remains regarding potential impacts. The burden of proof lies with the applicant to demonstrate this high evidential standard.

Furthermore, the applicant recognises that mitigation, compensation proposals, and future monitoring, while important, do not by themselves satisfy the statutory tests required under the Habitats Regulations. This rigorous approach ensures that all potential effects on protected habitats and species are thoroughly assessed before any consent is granted, reflecting the precautionary principle embedded within the legislation.

This legal framework is supported and reinforced by relevant policy provisions, including GEN 9 and GEN 13 of the National Marine Plan and Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. Together, these policies establish a comprehensive and robust framework to safeguard protected sites, ensuring that decisions on consent are made with the utmost regard to environmental protection and legal compliance.

The practical consequence of the applicant's failure to demonstrate compliance with statutory tests is that the application falls short of the legal safeguards designed to protect internationally important ecological features. Without clear evidence that these tests can be satisfied, proceeding with consent risks significant and potentially irreversible harm to protected habitats and species.

The submitted evidence, including the applicant's own derogation documents, reveals a troubling lack of certainty regarding the impacts on these internationally significant ecological assets. This absence of demonstrable compliance with statutory requirements undermines confidence in the applicant's ability to mitigate or avoid harm, a prerequisite for lawful consent under the relevant environmental protections.

Given this fundamental shortcoming, it is not appropriate to grant planning permission. The statutory framework exists precisely to ensure that developments do not compromise vital ecological interests, and the failure to meet these tests justifies refusal in order to uphold statutory obligations and conserve internationally important habitats and species.

1.1.356 Cumulative and In-Combination Effects

There is considerable uncertainty surrounding the reliability of the cumulative impact assessment submitted with this proposal. This uncertainty stems from the foundational baseline assessments upon which it relies. If the initial evaluations of landscape, heritage, and socio-economic effects underestimate the true impacts, then the subsequent cumulative assessment is inherently compromised.

The cumulative assessment depends directly on the conclusions drawn in the wider Environmental Impact Assessment. Should these underlying assessments present a reduced or understated baseline, as has been indicated, the cumulative analysis will naturally reflect this same limitation. Consequently, the combined effects of the current proposal, when considered alongside other existing, consented, and foreseeable developments, will be similarly underestimated.

This underestimation raises significant concerns about the adequacy of the cumulative impact assessment in capturing the full extent of potential harm. Without a robust and accurate baseline, the assessment cannot provide a reliable foundation for decision-making, thereby undermining confidence in the conclusions reached.

The failure to adequately address project splitting and cumulative effects within the application has significant practical implications for the decision-making process. Without a clear and comprehensive assessment of the proposal’s combined impacts, including any deferred works, there is a substantial risk that adverse environmental consequences may be overlooked. This omission undermines the integrity of the environmental impact assessment and compromises the ability of regulators and stakeholders to make fully informed decisions.

This concern directly relates to the requirements set out in GEN 21 and paragraph 4.85 of the National Marine Plan, as well as NPF4 Policy 11(e), which collectively emphasise the necessity of properly identifying and assessing cumulative and in-combination effects. Moreover, the Environmental Impact Assessment Regulations specifically address project splitting to prevent the fragmentation of assessments that could mask the true scale and significance of impacts. The applicant has not demonstrated compliance with these provisions, as the cumulative and overall effects of the project have not been reliably identified or evaluated.

Accordingly, it is imperative that the decision-making process explicitly considers the treatment of deferred works and ensures that all potential impacts are transparently and comprehensively assessed. Addressing this deficiency is essential to uphold policy and regulatory standards and to ensure that any approvals granted are based on a sound understanding of the full environmental implications of the project as a whole.

1.1.357 Public Engagement, Site Selection and Environmental Information

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

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

1.1.358 Effects on Local Area

The applicant's assessment falls short in adequately addressing the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, undermining the reliability of the environmental and heritage impact evaluation. While mitigation and compensation measures are proposed for internationally protected seabird populations along Colonsay's North Colonsay and Western Cliffs Special Protection Area, these acknowledge that harm cannot be excluded but do not extend to a full place-based evaluation of the wider community impacts. Islay, situated immediately south-east of the 448 square kilometre development area, is principally considered only as a potential project location rather than as a community whose Atlantic-facing settlements confront the nearest edge of the array. This oversight results in no substantive assessment of effects on Islay's setting, economy, or community life. Similarly, Colonsay and Oronsay's seaward outlooks, integral to daily life and cultural identity, face the array directly, yet the application fails to adequately assess the implications for these communities. Of particular concern is Oronsay Priory, a scheduled monument of national importance located within this area, whose open maritime setting is insufficiently addressed given the acknowledged gaps in the heritage assessment. Collectively, these deficiencies demonstrate that the applicant's evaluation does not reliably capture the full extent of impacts on these island communities, calling into question the sufficiency of the proposed mitigation and compensation measures.

The applicant's assessment notably underestimates the scale and significance of the visual, community, and heritage impacts on Iona, resulting in an incomplete evaluation of environmental and social effects that cannot be adequately mitigated.

The Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity, with direct orientation towards the development and extensive visibility across a large geographical extent. The overall effect is described as moderate and significant, with turbines visible over approximately 21 kilometres, spanning around 39 degrees of the horizon, including impacts on the ferry crossing between Fionnphort and Iona. Similarly, the West Coast of Iona is assessed as highly sensitive with widespread visibility; the applicant acknowledges significant effects on residents and visitors throughout much of the island, including at Dùn Ì, its highest point.

Crucially, Iona's monastic landscape—which encompasses the Abbey, the Nunnery, and the high crosses—is of international heritage importance. Its significance is closely tied to pilgrimage, arrival by sea, and movement through the landscape, as established in the applicant's own baseline studies. Historic Environment Scotland requested additional viewpoints from sensitive locations, including the ferry crossing itself; however, the applicant failed to provide visualisations from elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, leaving a critical gap in understanding the full visual impact on this heritage setting. Furthermore, a household consultation on Iona revealed that 92 per cent of respondents object to the proposal, yet the applicant's consultants did not assess habitability—a potential pathway of effect on the community identified in their own reports.

The perceived scale of the turbines can be contextualised by comparison with a familiar local landmark: Ben Hynish on Tiree stands at 141 metres and is visible from Iona at approximately 33 kilometres. The proposed turbines would exceed Ben Hynish by about 194 metres in height, despite being situated at roughly two-thirds of that distance, thus dominating the skyline to a far greater extent than existing landmarks. Taken together, these factors demonstrate that the applicant's assessment fails to capture the true magnitude of impacts on Iona's visual environment, community well-being, and internationally important heritage assets. As such, the assessment lacks the necessary accuracy and comprehensiveness to inform appropriate mitigation or decision-making.

The applicant's assessment underestimates the practical impacts on the coastal communities and landscapes of Mull and Ross of Mull, particularly regarding their tourism-dependent economies and designated scenic areas. For instance, the Ross of Mull South coastal area is acknowledged as highly sensitive and experiences significant effects at key locations such as Erraid and the Core Paths of the Ross. Fionnphort, serving as the gateway to Iona and a crucial embarkation point for visitors, is identified as the community most directly affected by visitor flows, yet no dedicated place-based assessment has been provided for it. Similarly, significant effects are accepted across Mull's Core Paths and within important local landscape areas, including the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, recognised for its high sensitivity throughout a viewing range of 21 to 33 kilometres, is only attributed medium magnitude effects, which does not fully reflect the potential for adverse impacts. The applicant's reliance on distance as a primary factor, such as in the case of the Wilderness and Gribun Rocks coastal area where changes at over 30 kilometres are deemed small, oversimplifies the complex visual and experiential qualities that contribute to these landscapes' value. Moreover, the west-facing tourism economy, including wildlife

boat operations and accommodation sectors reliant on the Atlantic seascape, faces potential industrialisation from the development, yet none of these communities have been afforded a place-specific assessment. This gap in the evaluation risks overlooking significant economic and community consequences that should be carefully considered in the planning decision.

The applicant's assessment significantly underestimates the impacts on important designated landscapes and vulnerable island communities, leading to inadequate protection of their natural and cultural qualities. Ulva, a community-owned island within the Loch na Keal National Scenic Area, is a small, re-establishing community whose recovery critically depends on the unspoilt seascape and setting at risk; yet, no assessment of effects on Ulva has been made. Similarly, Staffa, also within the Loch na Keal National Scenic Area and renowned as one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development area—beyond the 30 kilometre threshold NatureScot recommended for assessing effects on National Scenic Area qualities. Despite acknowledging the panoramic maritime qualities of Staffa, the applicant concludes that the scale of change would be small and the effect not significant, a judgement that appears to downplay potential harm. The Jura National Scenic Area, assessed as having high sensitivity at a distance of 28 to 32 kilometres, is attributed only medium to low magnitude effects, justified by distance and retained landforms, even though its designation is founded on the wild, undeveloped character of its Atlantic outlook. The Scarba, Lunga and the Garvellachs National Scenic Area, situated approximately 35 to 40 kilometres away, is subject to a similar assessment approach. Taken together, these assessments fail to adequately reflect the significance of effects on these designated landscapes and island communities, thereby undermining the safeguards necessary to maintain their distinctive natural and cultural attributes.

While the applicant's assessment attributes a Low magnitude of change to the South Tiree coastal area despite its High sensitivity at approximately 35 kilometres, this conclusion merits closer scrutiny. Tiree's landscape is uniquely defined by its exceptionally low-lying topography, with the highest elevation at Ben Hynish reaching only 141 metres. This flat, open oceanic horizon is a defining characteristic, making the introduction of turbines up to 335 metres in height unprecedented and markedly intrusive. The significant vertical scale of these structures contrasts sharply with the island's natural features, suggesting that the assessment substantially understates the true magnitude of change. Consequently, the evaluation of effects on Tiree's sensitive and distinctive landscape character appears unreliable, warranting a more rigorous and proportionate appraisal of visual and environmental impact.

There remains significant uncertainty regarding the assessment of effects on mainland and island communities with direct visual and economic connections to the seascape within the proposed development area. Notably, the community-owned island of Gigha, renowned nationally for its successful island regeneration following community purchase, faces the development waters from the east. The applicant's assessment fails to address the potential impacts on this finely balanced community and its economy, leaving a critical gap in understanding the development's broader implications. Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors

throughout the peninsula. These seaward panoramas represent key receptors that the applicant's distance-based impact moderation approach appears to inadequately consider, further compounding the uncertainty surrounding the comprehensive evaluation of visual and economic effects.

Moreover, the west coast of Kintyre comprises a series of communities whose identity, character, and visitor economy are intrinsically linked to the open Atlantic seaboard views towards Islay, Jura, and adjacent waters. The Treshnish Isles, along with other small islands and mainland coastal areas overlooking the development zone, share this sensitive position, yet their specific circumstances remain unassessed. This omission undermines the applicant's attempt to present a robust and thorough assessment, as these receptors are integral to the regional seascape and economy. Given these unresolved uncertainties and the absence of a full appraisal of these communities' interests, the overall evaluation cannot be regarded as comprehensive or sufficient in addressing the development's wider effects.

1.1.359 Personal Observations

Finally, I would also ask the Scottish Ministers to consider: This is a typical example of Scottish people's priorities being overridden by the needs of the English.

1.1.360 Summary

The proposal under consideration fails to demonstrate compliance with the relevant statutory and policy frameworks governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal region. However, published analyses of the applicant's submissions reveal that these impacts have been understated. Furthermore, the essential heritage assessment has not been undertaken. While the proposal identifies potential effects on the island communities involved, it does not include an assessment of these impacts. In addition, the ecological requirements have not been proven to be capable of being met. Compounding these issues, only a portion of the overall project is currently before the Scottish Ministers for consideration.

Given these substantial shortcomings, it is respectfully urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm proposal and decline the associated marine licence. Should the Ministers consider not refusing consent outright, it is requested that they require the submission of additional environmental information along with enhanced visualisations. Moreover, the applications should only be determined following a public inquiry, thereby allowing thorough examination of the concerns raised in this objection. Regardless of the final decision, it is further requested that the Ministers explicitly address and state their conclusions regarding the impacts on cultural heritage and the island communities affected.

Yours faithfully,

[Redacted]

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

Member of the public 538
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, referenced by application 00012385 for consent under section 36 of the Electricity Act 1989, and application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications, lodged by MachairWind Limited (ScottishPower Renewables), must be considered with this letter as a registered objection, and I request to be informed of the final determination.

The project under consideration involves the construction of an offshore wind farm with a generating capacity of approximately 2 gigawatts. The development envisages between 91 and 144 turbines, each reaching up to 335 metres to blade tip, situated within a designated Windfarm Development Area encompassing some 448 square kilometres of marine space. This area lies to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in close proximity to the southern Hebridean islands and their coastal communities.

My objection is grounded in planning and environmental considerations, assessed against the statutory and policy framework governing these applications. It is important to emphasise that the onus lies entirely with the applicant to provide adequate and compelling evidence demonstrating compliance with all relevant tests and requirements. Objectors bear no obligation to prove the contrary. Having carefully examined the submissions, I conclude that MachairWind Limited has not met this evidential burden. Consequently, the applications should be refused consent.

1.1.361 Legislative and Policy Framework

The application fails to demonstrate adequate mitigation of adverse effects on natural beauty, flora, fauna, geological features, and sites of architectural, historic, or archaeological interest as required under Schedule 9 of the Electricity Act 1989. Schedule 9 explicitly mandates that the applicant must have regard to preserving these interests and take reasonable steps to mitigate any negative impacts arising from the proposal. Furthermore, the Scottish Ministers are similarly bound to consider these statutory duties when determining the application.

In this case, the applicant has not provided sufficient evidence to show compliance with these obligations. There are clear deficiencies and omissions in addressing the preservation and conservation requirements set out in Schedule 9. The absence of demonstrated mitigation measures and failure to properly consider the statutory duties constitute a conflict with the applicable legal and policy framework. As established, such shortcomings weigh decisively against the granting of consent.

The marine licence application before the authority is subject to determination under Part 4 of the Marine (Scotland) Act 2010, which mandates that authorisation decisions must align with Scotland’s National Marine Plan unless relevant considerations indicate otherwise. The National Marine Plan’s General Policies of particular relevance to this proposal include GEN 4 concerning Co-existence, GEN 6 and paragraphs 4.22 to 4.23 relating to the Historic Environment, GEN 7 and

paragraph 4.28 addressing Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 and paragraph 4.85 on Cumulative Impacts. These policies collectively form an integral part of the statutory assessment framework that must be satisfied for the application to be lawfully approved.

However, the application fails to demonstrate compliance with these statutory requirements and relevant policies of the National Marine Plan. The evidence before the determining authority identifies clear deficiencies and omissions in the applicant's submission, including inadequate consideration of cumulative impacts as required under GEN 21, insufficient engagement as mandated by GEN 18, and a lack of sound evidence in accordance with GEN 19. Furthermore, the application does not satisfactorily address the protection of the historic environment and natural heritage, contrary to GEN 6, GEN 7, and GEN 9, nor does it properly consider co-existence principles under GEN 4. These shortcomings represent substantive conflicts with the applicable legal and policy framework.

Given these unresolved deficiencies and the failure to meet the statutory policy tests, the application does not comply with the Marine (Scotland) Act 2010 or the National Marine Plan. As established by the statutory assessment requirements, where compliance has not been demonstrated or where evidence reveals conflicts with the legal and policy framework, such matters weigh decisively against the granting of consent. Therefore, the marine licence application should be refused on the grounds that it does not satisfy the mandatory statutory criteria and relevant National Marine Plan policies.

The applicant's submission acknowledges that National Planning Framework 4 (NPF4) is a significant material consideration and that its policies must be applied alongside relevant statutory duties and legislative requirements. Specifically, the proposal engages with Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy), as outlined in the applicant's evidence (S01). This recognition establishes the correct policy framework against which the proposal should be assessed.

However, the evidence clearly indicates that the proposal fails to demonstrate compliance with these key policies of NPF4. There are identified deficiencies and omissions in the applicant's submission concerning biodiversity protection, the safeguarding of natural places, the conservation of historic assets, and adherence to energy policies. These shortcomings represent conflicts with the applicable legal and policy framework, as the applicant has not provided sufficient evidence to satisfy the requirements of Policies 3, 4, 7, and 11. The absence of demonstrated compliance is a critical failing in the application.

Given these unresolved deficiencies and the failure to meet the statutory and policy obligations set out in NPF4, the proposal does not accord with the relevant planning framework. As established in the evidence (S01), where compliance has not been demonstrated or where conflicts with the legal and policy framework exist, these matters weigh against the granting of consent. Therefore, the proposal should be refused on the basis that it does not comply with the essential policies of National Planning Framework 4.

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

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

Given these unresolved deficiencies and the absence of adequate assessment, the proposal conflicts with the mandatory legislative provisions. Consequently, these failures weigh decisively against the granting of consent.

The proposal under consideration fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be properly considered and given due weight in the decision-making process. This statutory obligation is not a discretionary matter but a legal requirement that must be fulfilled to ensure lawful and sound planning decisions.

An examination of the submitted documentation reveals significant deficiencies and omissions in addressing the specific interests of island communities. There is no clear evidence that the proposal has undertaken a thorough assessment of how island communities would be affected, nor is there any indication that their interests have been meaningfully integrated into the planning rationale. This absence of demonstrable compliance with the Islands (Scotland) Act 2018 constitutes a fundamental procedural and substantive failing.

Moreover, the lack of adequate consideration conflicts directly with the applicable legal and policy framework. The Act explicitly requires that where compliance has not been demonstrated, or where evidence identifies such deficiencies or omissions, these matters must weigh against the granting of consent. In this case, the proposal's failure to properly consider and weigh the interests of island communities is a material shortcoming that cannot be overlooked.

In conclusion, the proposal does not meet the statutory requirements set out in the Islands (Scotland) Act 2018. The absence of proper consideration and due weight given to island communities' interests represents a clear conflict with the legal framework and constitutes a valid and compelling reason to refuse consent.

The applicant bears the responsibility of demonstrating, through robust, objective and proportionate evidence, that every relevant statutory duty, planning policy and environmental assessment requirement has been satisfied. This fundamental evidential burden is essential to ensure that the proposed development complies

fully with the comprehensive legal and policy framework governing planning decisions. The applicant's submission must therefore provide clear and convincing proof that all applicable obligations have been met without exception, establishing a sound basis for the determination authority to grant consent.

In this case, the applicant has failed to discharge this burden adequately. The evidence submitted does not demonstrate compliance with all relevant statutory duties, planning policies, and environmental assessment requirements. Where the evidence identifies deficiencies, omissions or conflicts with the applicable legal and policy framework, these shortcomings weigh decisively against the granting of consent. The absence of robust and complete evidence confirming compliance means that the proposal cannot be considered lawful or policy-compliant. Consequently, the application should be refused on the grounds that the applicant has not fulfilled the necessary evidential requirements to justify approval.

1.1.362 Conflict with National Planning Framework 4 and the Development Plan

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

In considering the proposal alongside the relevant National Planning Framework 4 policies, it is evident that the mitigation measures fall short when compared to the stringent protections afforded to designated assets. Policy 11 works in conjunction with Policy 4(c) and 4(d), which collectively safeguard National Scenic Areas and nationally important landscapes from significant adverse effects on the qualities for which they are designated. Additionally, Policies 7 and 3 provide further protection for scheduled monuments, their settings, and biodiversity, setting a high threshold for demonstration of safeguarding cultural and ecological values.

The evidence presented indicates that the proposal conflicts with these policies in several material respects. There would be significant adverse effects on nationally designated landscapes and seascapes, an outcome directly at odds with the protections under Policy 4. Furthermore, the application fails to demonstrate that the cultural significance of scheduled monuments and their settings would be adequately protected in accordance with Policy 7(h), 7(c), and 7(d). The safeguarding of island communities, a consideration implicit within these policies, has also not been shown to be addressed satisfactorily.

Ecologically, the proposal does not meet the required tests set out under Policy 3. The submitted evidence does not confirm that the ecological impacts can be adequately mitigated or compensated for, thus failing to demonstrate compliance

with the biodiversity protections integral to the NPF4. Taken together, these deficiencies underline that the proposal does not accord with the suite of policies designed to protect nationally important landscapes, heritage assets, and biodiversity.

The applicant has not provided evidence to demonstrate that the proposed development incorporates sufficient mitigation to address the adverse effects identified in relation to the terrestrial environment. In comparison to the protections afforded by the Argyll and Bute Local Development Plan 2, the proposal fails to safeguard the landscape, heritage, and community interests that these policies explicitly seek to preserve. This lack of adequate mitigation results in a clear discordance between the development and the established local policy framework.

Consequently, the proposal stands in direct conflict with the relevant provisions of the development plan, as well as with the overarching objectives set out in National Planning Framework 4 when considered in its entirety. Given the absence of compelling justification or effective mitigation measures, the proposal does not align with the statutory planning framework and should be regarded as inconsistent with the terrestrial development plan policies that are material to land-based effects.

1.1.363 Seascape, Landscape and Visual Effects

The applicant's written methodology, as set out in Appendix 16.1, does not specify a distance threshold beyond which major effects are considered to cease. However, an independently prepared Evidence Note, drawing exclusively on the applicant's Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, irrespective of receptor sensitivity or visibility extent. This implicit role of distance is further demonstrated by the applicant's own documents, which assess a coastal area over 30 kilometres distant by concluding that, given the viewing distance, the scale of change is small. Additionally, the Landscape Character synthesis describes High magnitude effects within about 20 kilometres, Medium effects between roughly 20 and 30 kilometres, and Low effects beyond 30 kilometres for certain landscape types. Consequently, the protective assessments appear to rely on systematically moderated magnitude inputs at precisely the distances where the most sensitive designated landscapes are located. This methodological approach results in conclusions that do not reliably reflect the true effects that the Scottish Ministers are being asked to consider.

The practical consequence of relying on the submitted visualisation materials is that they may not accurately convey the true scale and impact of the proposed development as experienced on site. NatureScot's own visualisation guidance, which the applicant follows, explicitly states that printed visualisations cannot fully replicate the scale perceived by a viewer in the field. This inherent limitation means that the images presented should be interpreted with caution, as they offer only an approximation rather than a precise representation of visual effects.

Moreover, the wireline drawings included within the panoramic projections share the same constraints as the accompanying photography. These wirelines are technical renderings embedded within the visualisation and are not independent tools that

correct or enhance the accuracy of the photographic evidence. Consequently, the visual materials should not be considered definitive in assessing the visual impact but rather as one element among many in the overall evaluation process. This recognition calls for a measured approach when weighing the visual evidence submitted in support of the application.

The introduction of aviation and navigation lighting to a previously unlit sea horizon will result in a permanent alteration of the night-time seascape character throughout the 35-year operational life of the development. This practical consequence is significant, as the current state of the seascape is defined by its natural darkness, an intrinsic aspect of its character that would be fundamentally changed by the presence of artificial lighting. The visual intrusion caused by such lighting is not a temporary or reversible effect; it represents a sustained transformation that will be experienced continuously over more than three decades.

From a policy perspective, the implications of consenting to this development extend beyond the immediate operational timeframe. Although the 35-year life sets a temporal boundary on the physical presence of the lighting, it does not limit the policy harm associated with this change. A decision to grant consent effectively signals that this particular seascape is deemed appropriate for wind farm use, including its associated impacts such as the introduction of night-time lighting. This acknowledgment carries weight in future planning considerations, potentially establishing a precedent for accepting similar visual impacts in the area.

In conclusion, the permanent introduction of night-time lighting to the seascape constitutes a material change to its character that cannot be overlooked. The policy framework must therefore carefully weigh the acceptability of such a transformation, recognising that consent implies an endorsement of the seascape's suitability for wind farm development despite the significant alteration of its night-time qualities. It is essential that these considerations are fully accounted for in any decision-making process.

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

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

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

1.1.364 Cultural Landscape, Archaeology and Historic Environment

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

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

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

While the applicant's assessment acknowledges certain mitigation measures, it remains insufficient in addressing the broader cultural landscape and experiential qualities integral to the heritage assets. The baseline evidence itself recognises that the cultural significance derives not merely from isolated features but from dynamic qualities such as pilgrimage routes, arrival by sea, movement through a living cultural landscape, and the interrelationships between monuments, spirituality, and their surrounding landscape and seascape. These attributes are experienced primarily through movement rather than fixed viewpoints, underscoring the need for a more comprehensive approach to impact assessment. Furthermore, Historic Environment Scotland's consultation responses, as recorded within the application, explicitly request additional viewpoints to ensure these wider qualities are properly captured and represented. Consequently, the applicant's current assessment falls short of fully reflecting the cultural significance and experiential baseline, thereby limiting the effectiveness of proposed mitigation and the robustness of heritage impact evaluation.

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

Consequently, if the landscape assessment fails to fully capture the extent or severity of landscape impacts, the heritage conclusions derived from it are inherently compromised. This undermines the credibility of the heritage impact analysis and suggests that the overall assessment may not adequately reflect the true scale of harm to heritage assets. Such a foundational shortcoming calls into question the robustness of the conclusions relied upon in support of the proposed development.

The application fails to demonstrate adequate mitigation measures to protect the cultural significance of internationally and nationally important heritage assets and their settings. Unlike the stringent requirements set out in NPF4 Policy 7(h) regarding scheduled monuments, and Policies 7(c) and 7(d) concerning their setting, the applicant's submission does not provide the necessary assessment or evidence to confirm that these assets will be safeguarded in accordance with these policies. Similarly, the requirements of GEN 6 and the guidance in paragraphs 4.22 to 4.23 of the National Marine Plan are not sufficiently addressed, leaving a significant gap in the protection framework that these policies and plans seek to establish.

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

1.1.365 Effects on Island Communities, Tourism and the Local Economy

The island communities subject to this proposal exhibit an exceptional dependence on visitors, whose arrival is principally motivated by the very qualities identified within the applicant's baseline assessments: landscape, seascape, cultural heritage, tranquillity, and remoteness. These attributes constitute the core attractions that underpin the local tourism economy. Any alteration to these intrinsic qualities is therefore not merely an aesthetic or environmental concern but represents a direct threat to the fundamental economic structure of these communities.

The economic base supported by visitor expenditure sustains local services, underpins population retention, and ensures the ongoing viability of these island settlements. Disruption or degradation of the key qualities that attract visitors will have cascading effects, undermining service provision and jeopardising the social fabric and long-term sustainability of the islands. Thus, the proposal, by impacting these critical attributes, endangers the essential economic and social resilience of these communities.

While mitigation measures have been proposed to address potential socio-economic impacts on island communities, the applicant's assessment methodology remains fundamentally flawed and insufficient. Notably, the applicant's own consultants acknowledged habitability as a potentially significant pathway through which the proposal could affect island communities. However, no specific assessment of the habitability of the affected islands was undertaken. Instead, Chapter 18 of the socio-

economic assessment focuses primarily on regional-level analysis, examining port communities in detail but neglecting an equivalent place-based assessment of the island communities directly facing the development. Despite this omission, the assessment concludes that these island communities exhibit low sensitivity to tourism-related effects, a conclusion reached without robust, localized analysis.

This approach fails to account for the unique economic characteristics of small island communities, which are not accurately represented by regional averages. Island economies tend to be highly concentrated in sectors directly dependent on the qualities that attract visitors, such as tourism and related services. Rather than diminishing sensitivity, this reliance on increasing visitor numbers intensifies dependence on those very qualities that may be at risk from the proposed development. Therefore, the conclusion of low sensitivity to tourism impacts, derived without any place-based analysis, cannot be considered evidence-based but instead represents an unsubstantiated assumption. Consequently, the socio-economic assessment does not provide a reliable basis for understanding or mitigating potential impacts on island communities.

The proposal fails to meet the required standards for assessing and protecting island communities, as mandated by GEN 19 and paragraph 4.81 of the National Marine Plan, which necessitate decisions to be grounded in robust socio-economic evidence and to adopt a precautionary approach when such evidence is lacking. Additionally, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 impose a clear obligation to assess and give due weight to the interests of island communities through meaningful engagement from the outset to the conclusion of the decision-making process.

Despite recognising the need for particular scrutiny of island communities, the applicant has not undertaken the necessary assessments to understand the potential effects of the proposal on these communities. The absence of such critical analysis means that the proposal’s compatibility with sustainable island communities remains unsubstantiated. Consequently, the statutory duties owed to these communities have not been fulfilled or demonstrably discharged.

In conclusion, the proposal does not comply with the relevant planning policies or statutory requirements aimed at safeguarding island communities. Given this fundamental shortcoming, it is clear that the proposal cannot be supported as it stands, and it should be refused to ensure that the statutory and policy protections for island communities are upheld.

1.1.366 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, with surrounding waters that support seabirds, marine mammals, and basking sharks. Introducing large-scale construction, operation, and decommissioning activities into this sensitive environment over several decades risks significant adverse environmental effects. This ecological importance and sensitivity warrant careful consideration of the potential impacts arising from the proposal.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan focused specifically on the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are typically prepared for circumstances where an adverse effect on the integrity of a protected site cannot be ruled out. Their inclusion in the application is therefore a material consideration, signalling the applicant's acknowledgement of potential impacts.

Importantly, the applicant's approach concedes that Scottish Ministers may reach a different conclusion regarding adverse effects on the protected site's integrity. This recognition underscores that the submitted derogation and compensation documents are intended to address and mitigate potential impacts in accordance with relevant provisions, rather than to pre-empt regulatory assessment. As such, these documents form a critical component of the application's approach to compliance with protection requirements.

Consent for developments that may affect protected habitats and species can only be lawfully granted if it is conclusively demonstrated that the proposal will not adversely affect the integrity of the designated site. This requirement, established under the Habitats Regulations, imposes a rigorous evidential standard: no reasonable scientific doubt can remain regarding the absence of adverse effects. Consequently, the applicant bears the full burden of proof to satisfy this high threshold.

This legal requirement is further reinforced by relevant planning policies, including GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). Together, these policies underscore the necessity for stringent assessment and caution in decision-making concerning developments impacting protected natural assets, ensuring that environmental safeguards are paramount.

It is important to note that mitigation strategies, compensation measures, or proposals for future monitoring cannot, in isolation, fulfill the statutory tests required under the Habitats Regulations. Only where these rigorous conditions are met without reasonable scientific doubt may consent be lawfully granted. This framework ensures that protection of habitats and species is not compromised by speculative or insufficiently evidenced development proposals.

The practical consequence of the applicant's failure to meet the statutory tests is that the application cannot lawfully proceed without undermining the protection afforded to internationally important ecological features. This shortcoming directly impacts the decision-making process, as the legal framework requires unequivocal demonstration that such habitats and species will not be adversely affected. Without satisfying these tests, the application's approval would be inconsistent with statutory obligations.

The evidence submitted, including the applicant's own derogation documents, reveals a significant degree of uncertainty regarding the potential impacts on protected habitats and species. This uncertainty stems from a lack of definitive demonstration that the statutory tests can be fulfilled. The tests are designed to

safeguard internationally important ecological assets by ensuring that any development avoids, mitigates, or compensates for harm; the applicant has not provided sufficient assurance in this regard.

Consequently, the failure to demonstrate compliance with these legal requirements undermines the case for granting consent. It is essential that development proposals affecting internationally important habitats and species meet the statutory criteria fully and transparently. Given the evidence, it is clear that this application does not meet that standard and therefore should not be approved.

1.1.367 Cumulative and In-Combination Effects

The practical consequence of deferring key components of the project—specifically the export cable corridor and onshore transmission works—is that the current assessment before the Scottish Ministers is inherently incomplete. These deferred elements are essential for the wind farm's operation, yet they are excluded from the principal decision and relegated to future applications. This fragmentation means that the full range of effects arising from the entire development is never evaluated collectively. Such an approach directly conflicts with the legal principle established by the courts in Raeshaw Farms, which mandates that a project must be assessed in its entirety rather than being segmented into smaller parts whose isolated impacts may appear less significant. Consequently, the current assessment process is legally and procedurally flawed, undermining a comprehensive and transparent evaluation of the project's overall impacts.

The cumulative impact assessment relies directly on the findings of the underlying Environmental Impact Assessment, including the landscape, heritage, and socio-economic evaluations. As these foundational assessments have been demonstrated to understate the effects, the cumulative assessment consequently adopts this diminished baseline. This results in an overall underestimation of the combined impacts arising from the proposed development in conjunction with other existing, consented, and foreseeable projects. Therefore, the cumulative effects reported cannot be considered reliable or reflective of the true extent of impact.

The applicant's submission engages with GEN 21 and paragraph 4.85 of the National Marine Plan, alongside NPF4 Policy 11(e) and the Environmental Impact Assessment (EIA) Regulations concerning project splitting. However, it has not satisfactorily demonstrated that the cumulative and in-combination effects of the proposal, nor the overall effects of the project, have been reliably identified and assessed. This shortfall raises concerns about compliance with the relevant planning policies and environmental regulations designed to ensure comprehensive evaluation of potential impacts.

Given this context, it is imperative that the treatment of deferred works is explicitly addressed within the decision-making process. Without clear consideration of these deferred elements, the assessment remains incomplete, potentially undermining the integrity of the planning determination. Therefore, a thorough evaluation of all components, including deferred works, should be mandated to ensure full regulatory compliance and informed decision-making.

1.1.368 Public Engagement, Site Selection and Environmental Information

When comparing the consultation process for this application to the standards set by GEN 18 of the National Marine Plan and the principles of effective public participation enshrined in the Aarhus Convention, it is evident that the affected communities have not been afforded a realistic opportunity to engage meaningfully with decisions of such magnitude. The applicant seeks significant weight to be given to the site-selection process; however, this process's legitimacy is undermined by persistent deficiencies in public participation, which have carried through from the plan and site-selection stages into the current application phase.

The consultation coincided with the busiest months for island communities, a period when residents are occupied with continuous work throughout the visitor season and when access to specialist advice is particularly limited. Meanwhile, the applicant has had years, alongside substantial professional and financial resources, to prepare its extensive technical submission comprising thousands of pages. Under these conditions, the affected communities have been placed at a distinct disadvantage, falling short of the standards expected for effective participation. This disparity should be a crucial consideration for Ministers when evaluating the representations submitted.

There remains considerable uncertainty regarding the sufficiency of the Environmental Impact Assessment submitted with this application. While the assessment is extensive in scope, its adequacy is questionable, as it identifies potential pathways to significant effects but fails to investigate them thoroughly. For example, the landscape assessment employs a methodology that does not align with the outcomes presented, notably applying a distance pattern not supported by its own framework. Similarly, the heritage assessment lacks demonstration of its own integrity test's application, and the socio-economic assessment omits a place-based analysis of the islands affected. These methodological shortcomings undermine the reliability of the conclusions drawn.

Moreover, the reliance on future assessment, post-consent plans, monitoring, and additional approvals does not satisfy the requirements of the Environmental Impact Assessment Regulations, which stipulate that likely significant effects must be understood before determination. The Scottish Ministers are compelled to decide based on the evidence currently available, rather than on the expectation that unresolved issues will be addressed satisfactorily at a later stage. The applicant has not demonstrated that the environmental information provided is adequate for informed decision-making, and as such, the application should not be approved in its present form.

1.1.369 Effects on Local Area

The applicant's mitigation and compensation proposals, while addressing certain ecological concerns such as those related to the North Colonsay and Western Cliffs Special Protection Area, fall short of adequately accounting for the broader and more direct impacts on the communities of Islay, Colonsay, and Oronsay. The derogation case and compensation plan acknowledge potential harm to the internationally protected seabird populations along Colonsay's coastline, yet this represents the

only clear recognition of significant adverse effects. By focusing predominantly on ecological mitigation, the application fails to extend similar rigour to the assessment of social, economic, and cultural impacts, leaving these factors insufficiently considered and underrepresented.

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

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

The applicant's assessment of visual and community impacts on Mull and Ross of Mull coastal areas notably underestimates the significance of effects despite recognising some high sensitivities. While mitigation measures are acknowledged, they rely heavily on distance-based reasoning that inadequately addresses the experiential and economic consequences for local communities. For instance, the Ross of Mull South coastal area is identified as having High sensitivity at 22 to 24

kilometres and is attributed only Medium magnitude impacts, yet significant effects are accepted at Erraid and on the Core Paths of the Ross. Fionnphort, a key gateway to Iona and the primary embarkation point for visitors, is acknowledged to be significantly affected, yet no place-based assessment has been undertaken for this community most directly tied to visitor flows. Similarly, across Mull, significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Area are accepted, and the Loch na Keal National Scenic Area, despite being of High sensitivity throughout at distances of approximately 21 to 33 kilometres, is assigned no more than Medium magnitude impacts. This approach is further exemplified in the treatment of the Wilderness and Gribun Rocks coastal area, where the applicant's conclusion of a small scale of change due solely to viewing distances over 30 kilometres illustrates a reliance on quantitative distance rather than qualitative experience. Crucially, Mull's west-facing tourism economy—including wildlife boat operations and accommodation providers—depends on the largely unindustrialised Atlantic seascape that the development would fundamentally alter, yet none of these vital communities has received a tailored, place-based impact assessment. This collective inadequacy in addressing the significant visual, economic, and community impacts on Mull and Ross of Mull's designated landscapes and tourism-dependent populations represents a fundamental shortcoming in the applicant's assessment.

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

The applicant's assessment assigns a Low magnitude of change to the South Tiree coastal area despite its designation as a receptor of High sensitivity at a distance of approximately 35 kilometres. This evaluation appears inconsistent when compared to typical mitigation standards, where sensitive landscapes exposed to large-scale vertical interventions would ordinarily warrant a higher magnitude rating to reflect the visual and character impacts adequately.

Tiree's landscape is uniquely defined by its exceptionally low-lying topography and the dominance of uninterrupted sea and sky. With its highest elevation, Ben Hynish, reaching only 141 metres, the introduction of turbines rising up to 335 metres would present unprecedented vertical intrusions on the island's seascape. Given this context, categorising the magnitude of change as Low significantly underestimates the scale of visual and experiential impact on such a sensitive receptor, thereby rendering the applicant's evaluation unreliable and insufficiently robust.

The applicant's assessment notably omits consideration of significant effects on several mainland and island communities that have direct views of the proposed development and whose economies and identities are closely tied to the seascape. For instance, Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by residents, faces the development site from the east. The finely balanced nature of Gigha's community and economy means that any changes in the seascape could have profound implications; yet, these have not been examined in the submitted assessment. Similarly, Ardnamurchan Point, the most westerly point of the British mainland, offers panoramic views along the Hebridean seaboard which attract visitors throughout the peninsula. These seaward panoramas are precisely the type of receptor that the applicant's distance-based moderation approach fails to adequately address, as it diminishes the potential significance of visual and experiential effects at such key viewpoints. Furthermore, the west coast of Kintyre comprises a chain of communities whose outlook, character, and visitor economies are intimately defined by the open Atlantic seaboard looking towards Islay, Jura, and the surrounding waters. The Treshnish Isles, along with other small islands and mainland coasts in the vicinity with views towards the development, share this same position. Collectively, these receptors represent sensitive social and economic interests that are unaccounted for in the applicant's evaluation. This lack of assessment undermines the comprehensiveness and reliability of the overall environmental and socio-economic analysis, leaving a gap in understanding the full extent of the development's potential impacts on these mainland and island communities.

There remains considerable uncertainty surrounding the applicant's reliance on a distance-based methodology that applies systematic moderation and discounting of effects beyond approximately 20 kilometres. This approach inherently assumes that impacts diminish uniformly with distance, yet it fails to account for the nuanced and place-specific sensitivities of receptors located beyond this threshold. Such generalisation risks overlooking significant adverse effects that may persist or manifest differently at greater distances, thereby compromising the thoroughness of the environmental impact assessment.

Critically, as evidenced, the applicant's assessment effectively minimises the magnitude of change experienced by highly sensitive receptors beyond the 20-kilometre boundary, while neglecting to conduct any detailed place-based evaluation for the affected communities. This procedural omission undermines the integrity of the assessment process and its conclusions, leaving those communities without due consideration of the effects they endure. Consequently, the applicant's approach does not provide a robust or comprehensive appraisal of environmental impacts and should be re-examined to ensure all significant effects are properly identified and addressed.

1.1.370 Summary

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

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

Yours faithfully,

[Redacted]

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

Member of the public 539
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, corresponding to application numbers 00012385 for consent under section 36 of the Electricity Act 1989, and 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010, both submitted by MachairWind Limited (ScottishPower Renewables). I request that this objection be officially recorded and that I be notified of the outcome of these applications.

The proposed development involves the construction of an offshore wind farm with an installed capacity of approximately 2 gigawatts. This installation would consist of between 91 and 144 turbines, each with a maximum blade tip height of up to 335 metres. The site lies within a Windfarm Development Area covering roughly 448 square kilometres of sea, located north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in proximity to various islands and coastal communities within the southern Hebrides.

This objection is grounded in planning and environmental considerations, assessed within the relevant statutory and policy frameworks applicable to the determination of these applications. It is incumbent upon the applicant to provide robust and sufficient evidence demonstrating that all relevant planning tests and statutory requirements are fully satisfied. The onus is not on objectors to prove otherwise. However, having carefully reviewed the evidence presented, I conclude that the applicant has failed to meet this burden. Accordingly, consent for the proposed offshore wind farm should be withheld.

1.1.371 Legislative and Policy Framework

The application before the Scottish Ministers raises significant uncertainty regarding compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989. This Schedule explicitly requires the applicant to have regard to the desirability of preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, as well as protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant must take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The evidence submitted fails to demonstrate that these statutory duties have been adequately addressed, leaving a fundamental gap in the application’s legal and policy compliance.

In addition to the lack of demonstrated compliance, the evidence identifies clear deficiencies and omissions in the applicant’s consideration of these statutory requirements. There is no satisfactory explanation or assessment showing that the applicant has properly accounted for the preservation of natural beauty or the conservation of protected flora and fauna. Similarly, the application does not sufficiently address the protection of sites, buildings, or objects of architectural, historic, or archaeological interest, nor does it provide convincing mitigation measures for any adverse effects. These shortcomings represent a direct conflict with the statutory framework that governs the determination of this application.

Given these unresolved uncertainties and the failure to meet the statutory duties under Schedule 9, the application cannot be considered compliant with the legal requirements imposed by the Electricity Act 1989. As established in the evidence, where compliance has not been demonstrated, or where deficiencies and conflicts with the applicable legal and policy framework exist, these matters weigh decisively against the granting of consent. It is therefore incumbent upon the Scottish Ministers to refuse the application on the basis of these fundamental statutory and evidential failings.

The marine licence application under Part 4 of the Marine (Scotland) Act 2010 fails to demonstrate compliance with the statutory requirements of Scotland's National Marine Plan, specifically the General Policies GEN 4, GEN 6, GEN 7, GEN 9, GEN 13, GEN 18, GEN 19, and GEN 21, along with their associated paragraphs addressing co-existence, historic environment, landscape and national scenic areas, natural heritage, engagement, sound evidence, and cumulative impacts. The application lacks sufficient evidence to confirm adherence to these policies, which are integral to the statutory assessment process. This absence of demonstrated compliance constitutes a fundamental deficiency in the application's statutory and policy framework.

Given that compliance with the National Marine Plan policies has not been established, and the evidence reveals omissions and conflicts with the applicable legal and policy requirements, these shortcomings must weigh decisively against the granting of consent. The application's failure to meet the necessary statutory standards and policy obligations under the Marine (Scotland) Act 2010 and the National Marine Plan renders the proposal unacceptable in its current form and justifies refusal of the marine licence.

The proposal under consideration fails to demonstrate compliance with key policies of the National Planning Framework 4 (NPF4), specifically Policies 3, 4, 7, and 11, which address biodiversity, natural places, historic assets, and energy respectively. NPF4 is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. The absence of demonstrated compliance with these policies, as well as the identification of deficiencies and omissions within the submitted evidence, weighs decisively against the granting of consent.

Policy 3 (Biodiversity) requires that development proposals safeguard and enhance biodiversity. However, the application fails to provide sufficient evidence to confirm that biodiversity interests have been adequately protected or enhanced. Similarly, Policy 4 (Natural Places) mandates the protection of natural environments, yet the proposal does not demonstrate that natural places will be preserved or that any adverse impacts have been mitigated. Policy 7 (Historic Assets and Places) obliges the consideration and protection of historic assets, but the evidence does not establish that the proposal respects or conserves these assets in accordance with the policy requirements. Finally, Policy 11 (Energy) sets out expectations for energy considerations within development, but the proposal lacks the necessary evidence to show compliance with these energy policies.

Where compliance with these policies has not been demonstrated, and where deficiencies, omissions, or conflicts with the applicable legal and policy framework exist, such matters must be given significant weight against the proposal. In this case, the failure to meet the requirements of NPF4 Policies 3, 4, 7, and 11 constitutes a clear basis for objection. Consequently, the proposal should not be granted consent.

The applicant's submission must be considered in light of the statutory requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations, which mandate that the likely significant environmental effects of the proposal be identified, assessed, and reported prior to any determination. This procedural obligation is fundamental to ensuring that decision-makers have a comprehensive understanding of the environmental consequences before granting consent.

Furthermore, the Habitats Regulations impose a clear duty to assess the effects of the proposal on European protected sites in accordance with the applicable statutory tests. This assessment is not discretionary but a legal requirement designed to safeguard designated habitats and species from adverse impacts arising from development proposals. The absence of a demonstrably compliant Habitats Regulations Assessment undermines the statutory protection afforded to these sites.

In this case, the evidence indicates that compliance with both the Environmental Impact Assessment and Habitats Regulations has not been satisfactorily demonstrated. Deficiencies and omissions in the submitted documentation conflict with the applicable legal and policy framework. As established, where such compliance failures exist, they weigh decisively against the granting of consent. Accordingly, the proposal should be refused on the grounds of inadequate environmental and habitats impact assessment.

The proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018, resulting in a significant procedural and substantive deficiency. This statutory requirement obliges decision-makers to explicitly address the specific needs and circumstances of island communities, ensuring these are given due weight in the planning process. The absence of clear evidence demonstrating such consideration undermines compliance with this legal framework.

Furthermore, where compliance with the Islands (Scotland) Act 2018 has not been demonstrated, or where deficiencies and omissions exist in addressing the interests of island communities, these shortcomings must weigh against the granting of consent. The proposal's failure to meet this statutory obligation constitutes a material conflict with applicable legislation and policy, thereby justifying refusal on these grounds.

The applicant bears the responsibility of demonstrating, through robust, objective and proportionate evidence, that every relevant statutory duty, planning policy and environmental assessment requirement has been satisfied. In this case, the applicant has failed to meet this evidential burden. The submitted documentation

does not provide sufficient or conclusive proof that all applicable legal and policy frameworks have been complied with.

Furthermore, where compliance has not been demonstrated, or where the evidence identifies deficiencies, omissions or conflicts with the applicable legal and policy framework, those matters weigh against the granting of consent. Given the absence of clear, comprehensive evidence confirming adherence to all statutory duties and planning policies, the proposal cannot be considered compliant. This failure to demonstrate compliance constitutes a fundamental shortcoming that must result in the refusal of planning permission.

1.1.372 Conflict with National Planning Framework 4 and the Development Plan

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

When assessing the proposal against the relevant policies within NPF4, it becomes apparent that the necessary mitigation measures to prevent significant adverse effects on designated assets have not been satisfactorily demonstrated. Policy 11 must be considered alongside Policy 4(c) and 4(d), which afford protection to National Scenic Areas and nationally important landscapes by preventing significant adverse impacts on the qualities for which these areas are designated. In addition, Policies 7(h), 7(c), and 7(d) specifically safeguard scheduled monuments, their settings, and other historic assets. Policy 3 further requires the protection of biodiversity. The evidence submitted fails to show that the proposal's impacts can be effectively mitigated to a degree that would comply with these interconnected policies, particularly in relation to the preservation of landscape qualities, heritage asset significance, and ecological integrity.

Moreover, the proposal falls short in demonstrating that it would safeguard island communities and their unique cultural and environmental contexts, which are fundamental considerations under these policies. The significant adverse effects anticipated on nationally designated landscapes and seascapes are not adequately addressed, nor has the cultural significance of scheduled monuments and their settings been convincingly protected. The ecological assessments submitted do not

meet the requisite tests to confirm that biodiversity interests would be maintained or enhanced. Taken together, these shortcomings establish a clear conflict with multiple NPF4 policies designed to protect nationally important landscapes, heritage assets, and biodiversity, thereby undermining the proposal's compliance with the national planning framework.

In comparing the proposed development to the existing terrestrial planning framework, it is apparent that the mitigation measures fail to address the fundamental conflicts identified with the Argyll and Bute Local Development Plan 2. The proposal would adversely affect the landscape, heritage, and community interests that these policies are designed to protect. This failure to adequately mitigate impacts on land-based assets distinguishes the proposal from acceptable developments that align with the objectives of the Local Development Plan.

Consequently, the proposal is inconsistent with the development plan as a whole, including National Planning Framework 4. The applicant has not provided sufficient evidence to demonstrate that the proposal complies with the relevant policies or that the adverse effects can be appropriately managed. On this basis, the proposal conflicts with the terrestrial development plan framework and should be refused.

1.1.373 Seascape, Landscape and Visual Effects

There is notable uncertainty regarding the applicant's assessment methodology, particularly in relation to distance thresholds beyond which major effects are considered to cease. The methodology outlined in Appendix 16.1 does not specify any such distance threshold, yet independent analysis of the applicant's Chapter 16 and accompanying appendices reveals a clear pattern: no highly sensitive receptor beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of its sensitivity or the extent of visibility.

The applicant's own documentation further illustrates the influence of distance on the assessment outcomes. For instance, an evaluation of a coastal area situated over 30 kilometres from the site concludes that the scale of change is small due to the viewing distance. Additionally, the Landscape Character synthesis categorises magnitude as High within about 20 kilometres, Medium between roughly 20 and 30 kilometres, and Low beyond approximately 30 kilometres for certain landscape types. This approach inherently moderates the perceived impact with increasing distance.

Such systematic moderation of magnitude at distances where some of the most sensitive designated landscapes are located raises significant concerns. The protective tests applied rely on these understated inputs, leading to conclusions that may not accurately represent the true effects the Scottish Ministers are being asked to consider. This undermines the reliability of the assessment and warrants careful scrutiny.

The practical consequence of relying on the visualisation materials submitted in support of the application is that they may not provide a fully accurate impression of the development's true visual impact. This stems from inherent technical and perceptual limitations recognised within NatureScot's visualisation guidance, which

the applicant has adopted. Specifically, the guidance acknowledges that printed visualisations cannot replicate the scale that a viewer experiences in the field. Moreover, the wireline drawings included within the same panoramic projections are themselves constrained by the photographic basis they accompany; they function as technical renderings within the visualisation rather than as independent tools to correct or enhance the photographic depiction. Consequently, the visual evidence presented must be regarded with caution, as it cannot be relied upon to convey the full extent or character of the visual effects. This limitation should be taken into account when assessing the application's overall impact on the landscape and visual amenity.

The applicant's evidence acknowledges that the proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration of the night-time seascape character throughout the stated 35-year operational life. This fundamental change would transform the visual experience of the seascape after dark, introducing new and continuous light sources where none presently exist.

Furthermore, the temporal limitation of 35 years does not mitigate the policy implications of this harm. Consent for the development would signify a policy judgement that the seascape is appropriate for wind farm use, thereby accepting the permanent alteration to its character. This recognition underscores the lasting significance of the lighting effects on the night-time seascape, beyond the operational timeframe.

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

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

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

1.1.374 Cultural Landscape, Archaeology and Historic Environment

There is considerable uncertainty regarding the robustness of the applicant's assessment of heritage impacts, specifically in relation to the methodology employed for evaluating the setting of historic assets. While the applicant claims to have adopted the recognised methodology developed by Historic Environment Scotland,

which emphasises assessing how changes affect the contribution setting makes to cultural significance and the integrity of that setting, it is unclear whether this has been rigorously applied. Notably, the methodology explicitly cautions against equating visual change directly with adverse impact, underscoring the need for a nuanced evaluative approach.

An independent Methodological Audit, conducted solely on the basis of the applicant's Appendix 14.3, highlights this shortfall. The audit acknowledges that the operational assessment identifies relevant heritage attributes, such as visibility, distance, monument prominence, retained views, screening, and skyline occupation. However, it finds that the assessment does not demonstrate how these factors have been integrated to assess the integrity of setting in accordance with the accepted methodology. Instead, the assessment appears to describe visual change before concluding that setting integrity is adequately retained, without presenting the necessary evaluative step required to substantiate that conclusion.

This omission fundamentally undermines the reliability of the applicant's conclusions regarding heritage impacts. Without clear evidence that the accepted methodology has been properly applied, the assessment's findings remain uncertain and cannot be relied upon to inform planning decisions with confidence. It is therefore essential that the assessment methodology be scrutinised and fully demonstrated to ensure compliance and maintain the integrity of heritage considerations.

While the applicant's assessment acknowledges the cultural significance of the affected heritage assets, identifying key qualities such as pilgrimage, arrival by sea, movement through a living cultural landscape, and the interconnectedness of monuments, spirituality, and their surrounding landscape and seascape, it appears that the mitigation measures proposed may not fully address these dynamic experiential aspects. The applicant's baseline explicitly recognises that these values are experienced through movement rather than from fixed viewpoints, underscoring the importance of a broader cultural landscape perspective. Furthermore, Historic Environment Scotland, in their consultation responses recorded within the application, requested additional viewpoints to ensure that these wider qualities would be properly represented. This suggests that the current assessment and proposed mitigation may be insufficient in capturing the full extent of the heritage assets' cultural significance. Therefore, while some mitigation is offered, it falls short of encompassing the holistic and experiential qualities fundamental to the heritage assets, warranting further consideration to adequately protect their cultural value.

The heritage conclusions presented rely significantly on the landscape assessment. As noted in the evidence, where the landscape effects have been understated, the resulting heritage conclusions inherently reflect this understatement. This dependency indicates that any deficiencies in accurately assessing landscape impacts directly compromise the credibility and reliability of the heritage impact findings. Consequently, the heritage conclusions must be viewed with caution, as their foundation in an inadequate landscape assessment weakens their overall validity.

There remains significant uncertainty as to whether the application complies with key policy requirements concerning heritage protection. The proposal engages NPF4

Policy 7(h) on scheduled monuments and Policies 7(c) and 7(d) on setting, alongside GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. These policies collectively establish a clear framework for safeguarding the cultural significance of internationally and nationally important heritage assets and their settings.

However, the applicant has failed to demonstrate adequately that these heritage assets and their settings will be protected. Crucially, the Scottish Ministers do not have before them the comprehensive assessment necessary to support such a conclusion. In the absence of this essential information, the application cannot be deemed acceptable in terms of heritage policy compliance.

1.1.375 Effects on Island Communities, Tourism and the Local Economy

The proposal threatens the fundamental economic and social sustainability of the island communities by undermining the very qualities that attract their essential visitor base. These communities rely exceptionally heavily on visitors who are drawn to the landscape, seascape, cultural heritage, tranquillity and remoteness—all attributes explicitly identified in the applicant's own baseline assessments. Any alteration to these qualities directly jeopardises the economic foundation of these islands. This, in turn, would have cascading effects on local services, population retention and the overall viability of the communities. Consequently, the proposal poses a significant risk to the long-term sustainability of these island settlements.

The practical consequence of the applicant's approach is a fundamental underestimation of the potential socio-economic impacts on island communities directly affected by the proposal. While the applicant's consultants acknowledge habitability as a significant pathway for impact, no specific assessment of the habitability of these islands has been undertaken. Instead, the socio-economic assessment in Chapter 18 focuses primarily on regional port communities with detailed analysis, neglecting an equivalent, place-based assessment of the island communities themselves. Despite this lack of focused analysis, the assessment nonetheless concludes that these island communities exhibit low sensitivity to tourism effects, a conclusion that lacks substantive evidential basis.

This conclusion fails to recognise the unique economic characteristics of small island communities, which cannot be accurately represented by regional averages. Island economies are typically concentrated in sectors highly sensitive to changes in the environmental qualities that attract visitors. Moreover, an increasing dependence on visitor numbers intensifies, rather than mitigates, this sensitivity. Without place-specific analysis, the assertion of low sensitivity amounts to an unsubstantiated assumption rather than evidence-based reasoning. Consequently, the socio-economic assessment methodology is flawed and insufficient to properly understand or mitigate the impacts on the island communities facing the development.

The proposal fails to meet the necessary planning and statutory requirements for assessing and protecting island communities, resulting in a significant shortfall in compliance with established policies and duties. According to GEN 19 and paragraph 4.81 of the National Marine Plan, decision-making must be grounded in robust socio-economic evidence and adopt a precautionary approach where evidence is incomplete. Furthermore, NPF4 Policy 11(c) and the Islands (Scotland)

Act 2018 mandate that the interests of island communities are thoroughly assessed and given due weight through meaningful engagement from the earliest stages through to the conclusion of the process. Despite recognising the particular scrutiny required for island communities, the applicant has not conducted the necessary assessment to understand the proposal's effects on these populations. Consequently, there is no demonstrated compatibility with the sustainability of island communities, nor is there evidence that the statutory duties owed to these communities have been fulfilled. In summary, the proposal does not comply with key policy and statutory frameworks aimed at safeguarding island communities, and as such, it falls short of the standards required for approval.

1.1.376 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, as identified in the applicant's evidence. Additionally, the surrounding waters serve as habitats for seabirds, marine mammals, and basking sharks. This highlights the ecological importance and sensitivity of the site, given the presence of these protected species and habitats.

The proposed development would introduce extensive construction, operational, and decommissioning activities into this environmentally sensitive area over several decades. Such large-scale and prolonged disturbance carries a significant risk of adverse environmental effects on the Priority Marine Features and protected species present, necessitating careful consideration of potential impacts and mitigation measures.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are characteristically prepared when an adverse effect on the integrity of a protected site cannot be definitively ruled out. Notably, the inclusion of these materials constitutes a significant element of the application, as it implicitly acknowledges the possibility of adverse impacts. Furthermore, the applicant's own position suggests that Scottish Ministers may ultimately reach a different conclusion regarding the presence or extent of any adverse effects. While these submissions demonstrate the applicant's recognition of potential impacts and an intent to mitigate them, this does not in itself confirm that all concerns have been fully addressed or resolved.

Mitigation, compensation proposals, and future monitoring measures, while important considerations, are insufficient on their own to satisfy the stringent requirements set by the Habitats Regulations for granting consent to developments affecting protected sites. The competent authority must be convinced beyond reasonable scientific doubt that the proposal will not adversely affect the integrity of the habitat in question. This represents a high evidential threshold which the applicant bears the burden of demonstrating, ensuring that no residual uncertainty remains regarding potential harm.

This legal framework is further reinforced by relevant planning policies, including GEN 9 and GEN 13 of the National Marine Plan and Policies 3, 4(b), 4(e), and 4(f) of

NPF4. Together, they underscore the critical importance of safeguarding protected habitats and species, mandating that any consent be contingent on the strict derogation tests being met. Consequently, the policy and legislative context demands rigorous scientific certainty rather than reliance on proposed mitigation alone.

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

1.1.377 Cumulative and In-Combination Effects

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

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

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

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

The applicant has failed to demonstrate that the cumulative and in-combination effects of the proposal, including the full scope of the project, have been reliably identified and assessed. This shortcoming is particularly significant given the

potential for deferred works to contribute additional environmental impacts that remain unquantified and unconsidered. Such omission undermines the integrity of the environmental impact assessment and obscures the true scale of potential harm.

This failure constitutes non-compliance with established planning policies and regulatory frameworks, specifically engaging GEN 21 and paragraph 4.85 of the National Marine Plan, as well as NPF4 Policy 11(e). Furthermore, it contravenes the requirements of the Environmental Impact Assessment Regulations concerning project splitting, which mandate a comprehensive and integrated assessment of all components of a development to prevent piecemeal consideration that might understate cumulative effects.

In light of these concerns, it is imperative that the decision-making process explicitly addresses the treatment of deferred works to ensure a complete and transparent evaluation. Without this, there remains a material risk that significant environmental effects will be overlooked, justifying refusal of consent until such deficiencies are rectified.

1.1.378 Public Engagement, Site Selection and Environmental Information

The applicant places significant weight on the site-selection process, which renders the quality of public participation within that process directly material to the decision. However, deficiencies in public participation identified during the plan and site-selection stages have persisted into the application stage. The application itself comprises many thousands of pages of technical material, submitted during the busiest months of the year for island communities. This period coincides with the visitor season, when local residents are engaged continuously in work and specialist advice is least accessible. In contrast, the applicant has had years to prepare its case, supported by substantial professional and financial resources.

The requirements set out in GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, mandate that those affected must be afforded a realistic opportunity to participate in decisions of such magnitude. The circumstances under which the affected communities have been expected to respond fall short of this standard. This shortfall undermines the legitimacy of the consultation process and should be given careful consideration by the Scottish Ministers when evaluating the representations submitted.

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

Moreover, the application frequently relies on future assessments, post-consent plans, monitoring programmes, and additional approvals to address outstanding issues. This approach conflicts with the requirements of the EIA Regulations, which mandate that likely significant effects must be fully understood prior to determination. The Scottish Ministers are required to make decisions based on the evidence before them at the time of determination, rather than on the assumption that unresolved matters will be satisfactorily addressed at a later stage. In this regard, the applicant has not demonstrated that the environmental information submitted is adequate to enable an informed decision.

1.1.379 Effects on Local Area

The applicant's assessment falls short in adequately addressing the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, undermining the reliability of the environmental and heritage impact evaluation. While mitigation and compensation measures are proposed for internationally protected seabird populations along Colonsay's North Colonsay and Western Cliffs Special Protection Area, these acknowledge that harm cannot be excluded but do not extend to a full place-based evaluation of the wider community impacts. Islay, situated immediately south-east of the 448 square kilometre development area, is principally considered only as a potential project location rather than as a community whose Atlantic-facing settlements confront the nearest edge of the array. This oversight results in no substantive assessment of effects on Islay's setting, economy, or community life. Similarly, Colonsay and Oronsay's seaward outlooks, integral to daily life and cultural identity, face the array directly, yet the application fails to adequately assess the implications for these communities. Of particular concern is Oronsay Priory, a scheduled monument of national importance located within this area, whose open maritime setting is insufficiently addressed given the acknowledged gaps in the heritage assessment. Collectively, these deficiencies demonstrate that the applicant's evaluation does not reliably capture the full extent of impacts on these island communities, calling into question the sufficiency of the proposed mitigation and compensation measures.

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

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

The applicant's assessment of the visual and community impacts on Mull and Ross of Mull coastal areas relies heavily on distance-based mitigation assumptions, which inadequately reflect the true magnitude of change experienced by these sensitive locations. For example, while the Loch na Keal National Scenic Area is acknowledged as having High sensitivity at viewing distances between 21 and 33 kilometres, the applicant attributes no greater than Medium magnitude to the effects, thereby understating the significance of impact. Similarly, the Ross of Mull South coastal area, assessed as of High sensitivity at approximately 22 to 24 kilometres, is attributed only Medium magnitude despite acknowledged significant effects at Erraid, on Core Paths of the Ross, and notably at Fionnphort. This latter community is particularly critical as it serves as the gateway to Iona and the primary embarkation point for visitors, yet the assessment fails to adequately account for the disruption to its flow of tourism and community life. The treatment of more distant areas, such as the Wilderness and Gribun Rocks coastal area beyond 30 kilometres, further exemplifies this reliance on distance to downplay the scale of visual change, with the applicant concluding a small scale of change solely on that basis.

Beyond the shortcomings of the visual assessment, the applicant's approach neglects the essential economic and community dimensions tied to these landscapes. Mull's west-facing tourism economy, including its wildlife boat operators and the accommodation sectors within its western townships, is fundamentally dependent upon the Atlantic seascape, which the proposed development would industrialise. Despite this, none of these communities has been subject to a place-based assessment that might elucidate the full extent of economic and social impacts. The failure to recognise the interdependence of landscape, community identity, and visitor experience results in an incomplete and potentially misleading evaluation of effects. Given the prominence of tourism in sustaining these communities, and the designation of key landscapes as nationally and locally important, the applicant's assessment falls short of capturing the significant visual, economic, and community impacts that the development would engender.

The applicant's assessment appears to underestimate or omit significant effects on several important designated landscapes and vulnerable island communities, thereby undermining the protection of their natural and cultural qualities. While some

mitigation measures are proposed, a detailed comparison reveals shortcomings in addressing the specific sensitivities and contexts of these areas. Ulva, for example, lies within the Loch na Keal National Scenic Area and is a community-owned island at the beginning of its regeneration. This small, re-establishing community relies heavily on the unspoilt seascape and setting, yet no assessment has been made of the effects on Ulva, despite it sharing in full the impacts on the wider National Scenic Area. This omission is particularly concerning given the community's dependence on the qualities at stake. Similarly, Staffa, also within the Loch na Keal National Scenic Area and renowned as one of the most celebrated small islands in Europe, lies approximately 35 kilometres from the development area. This distance exceeds the approximate 30 kilometres to which NatureScot advised that effects on National Scenic Area qualities be assessed. Despite recognising the panoramic maritime qualities of Staffa, the applicant concludes that the scale of change would be small and the effect not significant, a position that appears insufficiently precautionary given the island's international importance. The Jura National Scenic Area, assessed as having high sensitivity at a distance of approximately 28 to 32 kilometres, is attributed only medium to low magnitude effects, with this moderation explained by distance, apparent scale, and retained landforms. However, this assessment seems to overlook the fundamental basis of Jura's designation, which rests on the wild, undeveloped character of its Atlantic outlook—precisely the quality potentially compromised by the development. A similar approach is taken to the Scarba, Lunga and the Garvellachs National Scenic Area, situated approximately 35 to 40 kilometres away, which also receives a comparable assessment. Taken together, these assessments suggest a pattern of underestimation or insufficient consideration of significant effects on designated landscapes and island communities, particularly where their defining qualities are dependent on unspoilt seascapes and remoteness. In conclusion, the applicant's approach does not fully acknowledge or mitigate the likely impacts on these sensitive areas, thereby risking harm to their natural and cultural attributes that warrant stronger protection.

In considering the potential visual and landscape effects of the proposed development on Tiree, it is instructive to compare the applicant's assessment with established understandings of the island's character and sensitivity. The applicant has attributed a Low magnitude of change to the South Tiree coastal area, despite recognising its High sensitivity at approximately 35 kilometres distance. This classification appears inconsistent when weighed against the unique and distinctive qualities of Tiree's landscape, which suggest a more significant impact is likely.

Tiree is an exceptionally low-lying island, characterised by its expansive sea and sky views that dominate the landscape. The highest elevation point, Ben Hynish, stands only 141 metres above sea level, reinforcing the openness and horizontality that define the island's visual identity. Introducing turbines reaching heights of up to 335 metres would impose vertical elements entirely without precedent in the seascape, disrupting the island's intrinsic character. Such structures would be highly conspicuous and fundamentally alter the perceived scale and openness that are core to Tiree's sense of place.

Consequently, the conclusion that the magnitude of change would be Low underestimates the extent of visual and landscape effects that would arise from the development. This understatement leads to an unreliable evaluation that fails to fully

account for the sensitivity of Tiree as a receptor. A more robust assessment would acknowledge the significant alteration to the island's open seascape and the introduction of prominent vertical features, thereby reflecting a greater magnitude of change commensurate with the island's distinctive landscape character.

While the applicant's assessment applies distance-based mitigation measures to reduce the perceived impact of the development on seascape receptors, it fails to account for significant effects on mainland and island communities that have direct views and economic reliance on the seascape. Notably, Gigha, a community-owned island celebrated nationally for its model of island regeneration, faces the development site from the east. Despite its finely balanced community and economy, the potential effects upon Gigha have not been examined, representing a considerable omission. Similarly, Ardnamurchan Point—the westernmost tip of the British mainland—offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas, precisely the receptors intended to benefit from the applicant's distance-based mitigation, remain unassessed in terms of their sensitivity to the proposed development. Moreover, the chain of communities along the west coast of Kintyre, whose identity and visitor economy are deeply connected to the open Atlantic seaboard views towards Islay, Jura, and surrounding waters, have been overlooked. The Treshnish Isles and other small islands and mainland coasts sharing views of the development area are equally excluded from a thorough evaluation. This lack of comprehensive assessment undermines the robustness of the applicant's appraisal and raises concerns about the full extent of the development's socio-economic and visual impacts on these key seascape communities.

The applicant's assessment adopts a distance-based methodology that systematically moderates the magnitude of change and discounts the significance of effects on highly sensitive receptors located beyond approximately 20 kilometres. This approach results in a notable deficiency: the communities residing in these more distant areas have not been subject to any place-based assessment. Consequently, the environmental impact assessment fails to fully account for significant effects on sensitive receptors beyond this arbitrary distance threshold, thereby undermining the overall integrity and comprehensiveness of the evaluation.

1.1.380 Personal Observations

In addition to the planning matters above, I am personally concerned because: The scale and risks in this development, combined with a shareholder driven business model will threaten the direct area and have ramifications for generations of Scots to come.

1.1.381 Summary

The proposal submitted by the applicant fails to satisfy the statutory and policy requirements essential for its determination. Notably, the applicant's own assessments acknowledge significant impacts on nationally designated landscapes, as well as on the coastal communities and their heritage. However, published analyses of the applicant's documents reveal that these impacts have been understated. Furthermore, the necessary heritage assessment has not been

conducted. Although the effects on the island communities involved were identified, no formal evaluation of these impacts has been undertaken. In addition, the ecological tests that must be met have not been demonstrated as achievable. It is also important to highlight that only a portion of the project is currently before the Scottish Ministers for consideration.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm proposal and to deny the associated marine licence. Should the Ministers be inclined not to refuse the applications outright, I request that they require the submission of further environmental information accompanied by enhanced visualisations. Moreover, I recommend that the determination of these applications be deferred until after a public inquiry, allowing for a thorough examination of the issues raised in this objection. Regardless of the outcome, I also ask the Ministers to provide clear and explicit conclusions in their decision statement regarding the impacts on cultural heritage and the affected island communities.

Yours faithfully,

[Redacted]

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

Member of the public 540
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, referenced by applications 00012385 under section 36 of the Electricity Act 1989 and 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010, both lodged by MachairWind Limited (ScottishPower Renewables). Please record this correspondence as an official objection, register me accordingly, and ensure I receive notification of the final determinations on these applications.

The proposed development entails an offshore wind farm with an installed capacity of approximately 2 gigawatts, consisting of between 91 and 144 turbines, each with a maximum height of up to 335 metres to blade tip. The site is located within a Windfarm Development Area encompassing around 448 square kilometres of marine environment situated north-west of Islay, west of Colonsay, approximately 21 kilometres from Iona, and in close proximity to the islands and coastal settlements of the southern Hebrides.

The grounds for objection are rooted in planning and environmental considerations, assessed against the statutory and policy frameworks governing these applications. It is important to emphasise that the responsibility to satisfy all relevant legal and policy tests lies solely with the applicant. The onus is on MachairWind Limited to provide compelling evidence demonstrating compliance with the applicable criteria. Objectors are not obliged to establish any contrary case. On the basis of the following analysis, the applicant has failed to meet this evidential standard, and therefore, the applications should be refused consent.

1.1.382 Seascape, Landscape and Visual Effects

The introduction of aviation and navigation lighting associated with the proposed development would permanently alter the night-time character of the currently unlit sea horizon for the entire 35-year operational period. This change is not merely a temporary effect limited to the lifespan of the development; rather, consenting to this proposal effectively acknowledges that the seascape is appropriate for wind farm use, with all attendant visual and environmental implications. Such a decision sets a precedent for the acceptability of lighting impacts in this sensitive seascape, fundamentally changing its character in a manner that should be carefully weighed against relevant policy considerations.

1.1.383 Cultural Landscape, Archaeology and Historic Environment

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

reliable. Therefore, the heritage impact conclusions should be treated with caution, given their dependence on an inadequate landscape assessment.

1.1.384 Effects on Island Communities, Tourism and the Local Economy

The proposal poses a direct threat to the economic and social sustainability of the island communities by undermining the very qualities that attract visitors. These communities rely exceptionally heavily on visitors drawn specifically by the landscape, seascape, cultural heritage, tranquillity, and remoteness identified in the applicant's own baseline assessments. Any alteration to these attributes will therefore have an immediate and detrimental impact on the visitor economy.

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

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

1.1.385 Cumulative and In-Combination Effects

The current assessment process for the project fails to provide a comprehensive evaluation of its environmental and operational impacts, as only a portion of the development—the wind farm itself—is before the Scottish Ministers. Crucially, key components such as the export cable corridor and onshore transmission works, which are essential for the wind farm's operation, are deferred to separate future applications. This fragmented approach precludes a full understanding of the cumulative effects, as the necessary infrastructure enabling the project's function is excluded from the initial consent. Consequently, significant impacts are deferred to subsequent consenting stages, limiting the ability of decision-makers to consider the project's totality at once.

This method of piecemeal assessment is inconsistent with established legal principles, notably those upheld in Raeshaw Farms, which emphasise that a project must be evaluated in its entirety rather than divided into smaller segments to minimise apparent individual effects. By salami-slicing the development into separate parts, the assessment undermines the procedural requirement for holistic scrutiny and risks overlooking cumulative impacts that could influence the overall acceptability of the proposal. Therefore, the current approach is procedurally and legally flawed, and it is imperative that the full scope of the project, including all integral elements, is assessed together to ensure a robust and lawful decision-making process.

1.1.386 Public Engagement, Site Selection and Environmental Information

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

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

1.1.387 Effects on Local Area

The applicant's assessment acknowledges significant effects on the Ross of Mull South coastal area, which is identified as having High sensitivity at distances of approximately 22 to 24 kilometres and attributed Medium magnitude. Significant impacts are accepted at Erraid and on the Core Paths of the Ross, as well as at Fionnphort, the gateway to Iona and the primary embarkation point for visitors, where the community is most directly affected by visitor flows. Similarly, across Mull, the applicant recognises significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, which encompasses Mull's western waters and islands and is assessed as High sensitivity throughout at distances of 21 to 33 kilometres, is nonetheless attributed no more than Medium magnitude.

However, this assessment relies heavily on distance-based reasoning, as exemplified by the treatment of the Wilderness and Gribun Rocks coastal area. Here, the applicant concludes that the scale of change is small due to the viewing distance exceeding 30 kilometres, a conclusion that this representation identifies as insufficiently reflective of actual visual and experiential impacts. Crucially, Mull's west-facing tourism economy, which includes wildlife boat operations and the accommodation sector of its western townships, depends fundamentally on the integrity of the Atlantic seascape that the development would industrialise. Despite this, none of these communities has received a place-based assessment tailored to their specific economic and social context.

In summary, the applicant's approach underestimates the significant visual, economic, and community impacts on Mull and Ross of Mull, particularly in relation to designated landscapes and tourism-dependent communities. This omission undermines a full understanding of the effects on these sensitive and economically reliant coastal areas.

The applicant's assessment concludes a Low magnitude of change on the South Tiree coastal area despite recognising its High sensitivity at a distance of approximately 35 kilometres. This practical consequence is significant, as it directly affects the reliability of the overall evaluation of the development's landscape and visual impacts on Tiree. By underestimating the magnitude of change, the assessment risks providing decision-makers with an incomplete understanding of the true scale of effects on this sensitive area.

Tiree's distinctive landscape character is defined by its exceptionally low-lying topography and the dominance of sea and sky. The island's highest point, Ben Hynish, rises only 141 metres, underscoring the open and expansive oceanic horizon that shapes its sense of place. Introducing turbines up to 335 metres tall would create vertical structures of unprecedented scale within this seascape, fundamentally altering the visual experience and character of the island. Such a dramatic visual intrusion cannot reasonably be characterised as having a Low magnitude of change.

In light of these considerations, the applicant's conclusion exemplifies a severe understatement of the effects on Tiree. The assessment's failure to fully acknowledge the scale of visual and landscape impact on this highly sensitive receptor undermines the reliability of its findings. Consequently, the evaluation should be revisited to ensure that the distinctive and vulnerable character of Tiree is adequately protected in the planning process.

The applicant's assessment fails to consider the significant effects on mainland and island communities whose economies and identities are closely tied to the seascape views impacted by the proposed development. Notably, Gigha, a community-owned island emblematic of island regeneration, faces the development waters directly to the east, yet no evaluation has been made regarding the potential consequences for its delicate community balance and local economy. This omission undermines the thoroughness of the environmental and socio-economic appraisal.

Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the receptors affected by the distance-based mitigation measures challenged in this objection, indicating a gap in the applicant's consideration of key visual and recreational receptors. The absence of specific assessment for such a prominent vantage point further calls into question the comprehensiveness of the visual impact evaluation.

Furthermore, the chain of communities along the west coast of Kintyre, whose outlook and visitor economy are intrinsically linked to the open Atlantic seaboard facing Islay, Jura, and adjacent waters, have been overlooked. The Treshnish Isles and other small islands and mainland coasts with views towards the development site similarly share this unassessed exposure. Collectively, these omissions demonstrate that the applicant's assessment does not adequately address the full range of receptors reliant on the seascape, thus compromising the integrity of the environmental impact appraisal. It is therefore essential that these gaps be addressed to ensure a comprehensive understanding of the development's effects.

1.1.388 Personal Observations

In addition to the planning matters above, I am personally concerned because: It will make it less likely that we will travel to the Inner Hebrides as tourists.

Based on my own local knowledge, I also wish to highlight that: The Inner Hebrides are a beautiful place to visit. The landscapes, seascape and local communities will be adversely affected. Many people will be less inclined to visit and spend their tourist pounds.

Finally, I would also ask the Scottish Ministers to consider: This development is symbolic of the shambolic way in which renewable energy developments are being handled across Scotland. Scottish Ministers are content to focus upon foreign direct investment at the expense of locally developed capacity. Planning applications are accepted over the concerns of local people and are approved in a piecemeal manner without taking account of the cumulative impact. This development will do little to contribute to the local economy. The equipment necessary will be imported from overseas and both the electricity generated and the profits accrued will be exported to other countries tries. Scottish Ministers are wedded to outdated notions of neoliberal economics and seem content to see Scotland and her people despoiled for the gain of immense corporations and their foreign shareholders.

1.1.389 Further Comments

I am not impacted locally by this development but I am impacted locally by similar renewable energy developments which have also been steamrollered through without due regard to the views of local people. Scotland produces more energy than it can use but pays some of the highest costs for electricity (both domestic and industrial) in the world. There is no coherent, long term, holistic view of the cumulative effects of the thousands of developments that have been/ will be approved. There is no evidence of joined-up thinking anywhere in the Scottish Government's Energy Consents Unit nor amongst the various government departments led by woefully misinformed Ministers.

1.1.390 Summary

The proposal for the MachairWind Offshore Wind Farm fails to demonstrate compliance with the relevant statutory and policy frameworks governing its determination. The applicant’s own assessment acknowledges significant impacts on nationally designated landscapes as well as on the heritage and communities of the coastal area in question. However, analyses derived from the applicant’s documentation reveal that the extent of these impacts has been underestimated. Crucially, the necessary heritage assessment has not been completed, and although the effects on the island communities affected by the development were identified, they have not been subject to proper evaluation. Furthermore, the project has not satisfactorily met the required ecological tests. It is also important to note that only a portion of the project currently lies before the Scottish Ministers for consideration.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to deny the associated marine

licence. Should the Ministers decide against refusal, I request that they require the submission of additional environmental information alongside enhanced visual representations. Moreover, I recommend that the determination of these applications be deferred until after a public inquiry, thereby allowing thorough examination of the objections raised.

Regardless of the final decision, I further request that the Scottish Ministers provide explicit conclusions within their reasoning, specifically addressing the impacts on cultural heritage and on the island communities affected by the proposal.

Yours faithfully,

[Redacted]

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

Member of the public 541
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, as detailed in application 00012385 seeking consent under section 36 of the Electricity Act 1989, and application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications, lodged by MachairWind Limited (a subsidiary of ScottishPower Renewables), relate to the construction of an offshore wind farm with an estimated capacity of approximately 2 gigawatts. The development would consist of between 91 and 144 turbines, each potentially reaching a maximum height of 335 metres to blade tip, situated within a designated Windfarm Development Area spanning about 448 square kilometres of marine environment. This area lies to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in close proximity to the southern Hebridean islands and their coastal communities.

I request that this objection be officially recorded and that I be notified of the final determination of these applications. The following sections outline the grounds for objection, framed within the statutory and policy context governing the decision-making process. It is important to emphasise that the onus lies squarely with the applicant to provide adequate and compelling evidence demonstrating that all relevant statutory tests and policy requirements are fully met. Objectors are not required to establish contrary proof. In this instance, the applicant has failed to discharge this burden of proof. Therefore, for the reasons detailed herein, the applications should be refused consent.

1.1.391 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989. Schedule 9 explicitly requires the applicant to have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant must take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The Scottish Ministers, in determining the application, are similarly required to have regard to these statutory duties.

The evidence before the determining authority does not establish that these requirements have been adequately addressed. There are clear deficiencies and omissions in the application’s consideration of these statutory duties, and no satisfactory demonstration that reasonable mitigation measures have been identified or proposed. This failure to comply with the statutory framework constitutes a significant procedural and substantive defect. As such, these unresolved matters weigh decisively against the granting of consent.

The marine licence application must be refused because it fails to demonstrate compliance with the statutory requirements of Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland’s National Marine Plan. The application does not adequately address the General Policies critical to this proposal, including GEN 4 on Co-existence, GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic

Environment, GEN 7 and paragraph 4.28 on Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 and paragraph 4.85 on Cumulative Impacts. These policies are integral to the statutory assessment process, and the absence of demonstrated compliance constitutes a fundamental procedural and substantive deficiency.

Furthermore, the evidence submitted with the application reveals clear omissions and conflicts with the applicable legal and policy framework. Where compliance with the National Marine Plan has not been shown, the statutory guidance explicitly states that such shortcomings must weigh against the granting of consent. The application's failure to provide sound evidence and to properly engage with the cumulative impacts and natural heritage considerations undermines the integrity of the decision-making process. Consequently, the marine licence application cannot be considered lawful or policy-compliant and must be refused on these grounds.

This proposal fails to demonstrate compliance with the mitigation requirements set out in National Planning Framework 4 (NPF4), specifically in relation to biodiversity, natural places, historic assets, and energy policies. NPF4 is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. The proposal engages Policies 3, 4, 7, and 11 of NPF4, which address biodiversity, natural places, historic assets and places, and energy respectively.

The submitted evidence does not establish that the proposal meets the standards or obligations of these policies. There are clear deficiencies and omissions in demonstrating how biodiversity will be protected or enhanced, how natural places will be conserved, how historic assets and places will be safeguarded, and how energy considerations will be appropriately addressed. These failures amount to conflicts with the applicable legal and policy framework.

Given that compliance with these key policies has not been demonstrated, and the evidence identifies substantive shortcomings, the proposal is contrary to the requirements of NPF4. As such, these matters weigh decisively against the granting of planning consent.

The application fails to comply with the statutory requirements for environmental impact assessment and habitats regulations assessment, rendering the determination of consent premature and unlawful. Under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, it is mandatory that the likely significant environmental effects of the proposal be identified, assessed, and reported prior to any decision. This procedural obligation ensures that decision-makers have a full understanding of the environmental consequences before granting consent. Furthermore, the Habitats Regulations impose a clear duty to assess the effects of the proposal on European protected sites in accordance with the applicable statutory tests. The submitted documentation does not demonstrate compliance with these legal requirements. The absence of adequate environmental impact assessment and habitats regulations assessment constitutes a fundamental deficiency and omission in the application. As established in the approved evidence, where compliance has not been demonstrated

or where evidence reveals such deficiencies or conflicts with the legal and policy framework, these matters must weigh decisively against the granting of consent. Therefore, the application should be refused on the grounds of failure to satisfy the mandatory environmental assessment and habitats protection obligations.

The proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018, resulting in a fundamental procedural deficiency. This statutory requirement is clear that the interests of island communities must be given due weight during the decision-making process. The absence of demonstrated compliance with this duty undermines the legitimacy of the planning assessment.

The submitted evidence does not show that the applicant or determining authority has adequately addressed or incorporated the specific needs and concerns of island communities affected by the proposal. This omission constitutes a failure to meet the legal obligations set out in the Islands (Scotland) Act 2018. Such deficiencies and omissions are material and must be regarded as weighing against the grant of planning consent.

Given the statutory framework and the lack of evidence demonstrating proper consideration of island community interests, the proposal conflicts with the applicable legal and policy requirements. In accordance with established principles, where compliance has not been demonstrated, these matters must lead to refusal of consent. Therefore, the application should be rejected on this basis alone.

The applicant has failed to discharge the fundamental responsibility of demonstrating compliance with all relevant legal and policy requirements, which is a prerequisite for the granting of planning consent. It is an established principle that the onus lies with the applicant to provide robust, objective, and proportionate evidence confirming that every applicable statutory duty, planning policy, and environmental assessment requirement has been fully satisfied. In this case, the evidence submitted does not meet this evidential burden.

Specifically, the applicant has not provided sufficient or conclusive evidence to show that all statutory duties have been complied with, nor that the proposal aligns with the relevant planning policies and environmental assessment obligations. The absence of such demonstrable compliance constitutes a significant deficiency in the application. Moreover, where the evidence does reveal omissions or conflicts with the legal and policy framework, these unresolved issues must be regarded as material considerations weighing against the approval of the proposal.

Given these shortcomings, the application fails to satisfy the necessary legal and policy tests. Without clear and convincing evidence of compliance, the proposal cannot lawfully proceed. Therefore, on the basis that the applicant has not fulfilled the evidential burden required to prove adherence to all statutory and policy requirements, the application should be refused.

1.1.392 Conflict with National Planning Framework 4 and the Development Plan

NPF4 Policy 11 explicitly supports renewable energy development; however, such support is contingent upon satisfying the impact criteria set forth within the policy itself. These include, notably, Policy 11(c), which addresses impacts on communities, alongside Policies 11(d) and 11(e), which pertain to impacts on landscape, seascape, and other receptors. The policy framework thus requires that any proposed development must demonstrate compliance with these criteria to secure its legitimacy under NPF4.

In this case, the proposal fails to meet these essential requirements. It would result in significant adverse effects on nationally designated landscapes and seascapes, undermining the integrity of these protected areas. Furthermore, there is no convincing evidence that the cultural significance of scheduled monuments and their settings would be preserved, nor that island communities would be adequately safeguarded from detrimental impacts. Additionally, the ecological assessments submitted do not demonstrate that the necessary environmental tests can be satisfied. Taken together, these shortcomings establish a clear conflict with the impact criteria of NPF4 Policy 11, thereby weakening the policy's intended support for renewable energy in this instance.

The proposal fails to comply with multiple policies within the National Planning Framework 4 (NPF4) that safeguard nationally important landscapes, heritage assets, and biodiversity. As set out in Policy 11, alongside Policies 4(c) and 4(d), there is a clear requirement to protect National Scenic Areas and nationally important landscapes from significant adverse effects on the qualities for which they are designated. Additionally, Policy 7—including Policy 7(h) concerning scheduled monuments and Policies 7(c) and 7(d) regarding the settings of historic assets—establishes a duty to preserve the cultural significance of such sites. Policy 3 further imposes rigorous tests to ensure biodiversity is maintained and enhanced.

In this case, the proposal would cause significant adverse effects on nationally designated landscapes and seascapes, undermining the fundamental purpose of these designations. Furthermore, the applicant has not demonstrated that the cultural significance of scheduled monuments and their settings would be adequately protected, nor has it been established that island communities, which are intrinsically linked to these heritage assets, would be safeguarded. Finally, the ecological assessments and tests required under Policy 3 have not been shown to be capable of being met on the evidence submitted. This cumulative failure to satisfy the interrelated policies protecting designated assets constitutes a clear conflict with NPF4 and weighs strongly against the proposal's acceptability.

The applicant has not provided evidence to demonstrate that the proposed development incorporates sufficient mitigation to address the adverse effects identified in relation to the terrestrial environment. In comparison to the protections afforded by the Argyll and Bute Local Development Plan 2, the proposal fails to safeguard the landscape, heritage, and community interests that these policies explicitly seek to preserve. This lack of adequate mitigation results in a clear discordance between the development and the established local policy framework.

Consequently, the proposal stands in direct conflict with the relevant provisions of the development plan, as well as with the overarching objectives set out in National

Planning Framework 4 when considered in its entirety. Given the absence of compelling justification or effective mitigation measures, the proposal does not align with the statutory planning framework and should be regarded as inconsistent with the terrestrial development plan policies that are material to land-based effects.

1.1.393 Seascape, Landscape and Visual Effects

The applicant's assessment methodology notably lacks a defined distance threshold beyond which major effects are considered to cease, yet their own evidence reveals an implicit limitation affecting the accuracy of predicted impacts. Analysis of the applicant's Chapter 16 and its appendices demonstrates a consistent pattern: no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of its sensitivity or visibility. This implicit distance influence is further substantiated by references to a coastal area over 30 kilometres away where the scale of change is described as small due to viewing distance, and by a Landscape Character synthesis that categorises magnitude as High within about 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. Consequently, the assessment systematically moderates magnitude at precisely the distances where the most sensitive designated landscapes are located, leading to understated inputs. This methodological approach results in conclusions that do not reliably represent the true effects the Scottish Ministers are required to consider in their decision-making.

The applicant has relied upon NatureScot's visualisation guidance in preparing the visual evidence for the assessment. This guidance explicitly recognises that printed visualisations are inherently limited in their ability to replicate the true scale perceived by a viewer in the field. Furthermore, wireline drawings, which are presented alongside panoramic photographic projections, share the same limitations as the photographs they accompany. These drawings serve as technical renderings within the visualisation and do not function as independent tools to correct or enhance the photographic depiction.

Such technical and perceptual limitations underline the challenges in fully conveying the visual impact of a development through printed materials alone. While the visualisations provide a useful indication, they cannot substitute for the actual experience of viewing the site in situ, where scale and context are understood more comprehensively. Consequently, reliance solely on these visual materials should be approached with caution when assessing the proposal's visual effects.

The proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration of the night-time seascape character for the entire 35-year operational period. This change would be immediately perceptible and enduring, fundamentally transforming the visual experience of the seascape after dark.

Beyond the operational lifespan, the harm caused to the seascape character cannot be dismissed, as consenting to this development effectively designates the area as suitable for wind farm use. Such a decision carries lasting policy implications by

establishing a precedent that the existing unlit seascape is appropriate for industrial-scale lighting and associated visual impacts.

Consequently, the introduction of permanent lighting must be carefully weighed within the planning framework, considering not only the immediate and ongoing effects on night-time seascape character but also the broader message such consent would send about the acceptability of this landscape for wind energy development. The decision should reflect a clear understanding of these implications before authorising the proposal.

The applicant acknowledges that the proposed development would give rise to certain effects which engage the provisions of National Planning Framework 4 (NPF4), specifically Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. However, despite recognising these effects, the applicant has failed to demonstrate that its conclusions regarding the scale of such effects are consistent with the methodology it employed. Crucially, there has been no satisfactory demonstration of compliance with the policies that safeguard nationally important landscapes and seascapes. This omission undermines confidence that the proposal adequately addresses the statutory requirements set out to protect these sensitive environmental assets. Consequently, the proposal does not meet the requirements of the relevant planning policies designed to protect landscape and seascape interests.

1.1.394 Cultural Landscape, Archaeology and Historic Environment

The applicant’s assessment of heritage impacts fails to comply with the required methodology, thereby undermining the reliability of its conclusions regarding the integrity of setting. Although the applicant adopts Historic Environment Scotland’s recognised methodology for assessing effects on the setting of historic assets—a methodology developed and refined through consultation with Historic Environment Scotland—this approach mandates an evaluation of whether changes to setting affect the contribution setting makes to the cultural significance of heritage assets. Crucially, it requires consideration of whether the integrity of setting is adequately retained, emphasising that visual change alone should not be equated directly with adverse impact.

However, a published Methodological Audit, prepared entirely from the applicant’s Appendix 14.3 and submitted in support of community objections, identifies significant shortcomings in the operational assessment. While the assessment identifies relevant heritage attributes and describes visual change in terms of visibility, distance, monument prominence, retained views, screening, and skyline occupation, it stops short of demonstrating how the integrity of setting has been evaluated in accordance with the applicant’s own accepted methodology. The necessary evaluative step—assessing the effect of these visual changes on the cultural significance and integrity of setting—is absent in all of the examined examples.

In consequence, the assessment’s conclusion that the integrity of setting is adequately retained lacks evidential foundation and cannot be relied upon. This

methodological failure casts serious doubt on the credibility of the heritage impact conclusions presented by the applicant.

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

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

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

The heritage impact conclusions presented in the proposal are closely linked to the findings of the accompanying landscape assessment. It is important to consider that any mitigation measures proposed rely fundamentally on the accuracy and comprehensiveness of the landscape evaluation. When landscape effects are minimised or understated, as has been identified, the proposed mitigation may not adequately address the full scope of potential harm.

This reliance raises significant concerns because the heritage conclusions effectively inherit the deficiencies present in the landscape assessment. If the latter underestimates the visual or environmental impacts, the resulting heritage assessment will similarly understate the potential adverse effects on historic assets. This interconnectedness means that any shortcomings in landscape evaluation directly undermine the credibility of the heritage impact findings.

Accordingly, the robustness of the overall assessment is compromised by this dependence. Without a fully accurate and transparent landscape analysis, the conclusions regarding heritage impacts cannot be regarded as reliable. It follows that the planning authority should carefully scrutinise these linked assessments to ensure that any mitigation measures are grounded in a comprehensive understanding of the true effects.

The proposed application fails to satisfy the critical requirements set out in NPF4 Policy 7, notably section (h) relating to scheduled monuments, as well as subsections (c) and (d) concerning their settings. This deficiency extends to the provisions of GEN 6 and the guidance contained within paragraphs 4.22 to 4.23 of the National Marine Plan, which collectively establish a robust framework for the protection of heritage assets. The absence of a comprehensive assessment that

addresses these policy elements quantitatively undermines the applicant's position and the application's overall compliance.

Moreover, the applicant has not provided adequate evidence to demonstrate that the cultural significance of heritage assets of international and national importance, along with their settings, will be safeguarded throughout the development process. This shortfall is significant, as it leaves the Scottish Ministers without the necessary information to evaluate whether the proposed measures are sufficient to mitigate potential impacts. The lack of such an assessment is a material omission that fundamentally weakens the application's justification in terms of heritage conservation.

In conclusion, the application's failure to meet the established policy requirements for the protection of heritage assets and their settings renders it unacceptable in its current form. Without a detailed and convincing assessment demonstrating the protection of these assets, the proposal cannot be supported. It is therefore respectfully urged that the application be refused on the grounds of non-compliance with essential heritage protection policies.

1.1.395 Effects on Island Communities, Tourism and the Local Economy

While mitigation measures may seek to address certain impacts, they fall short in safeguarding the essential qualities that underpin the economic and social fabric of the island communities affected by this proposal. These communities depend to an exceptional degree on visitors, who are drawn specifically by the attributes identified in the applicant's own baseline assessments: landscape, seascape, cultural heritage, tranquillity and remoteness. Any alterations to these defining characteristics strike directly at the economic base of these communities. Such a disruption threatens not only local services and population stability but also the long-term viability of these island communities themselves. Consequently, the proposal poses a fundamental risk to their economic and social sustainability.

The practical consequence of the applicant's flawed socio-economic assessment is a failure to properly identify and mitigate impacts on the island communities affected by the proposed development. The applicant's own consultants acknowledged that habitability could be a significant pathway for effects on these communities, yet no specific assessment of habitability was undertaken. Instead, the socio-economic analysis presented in Chapter 18 focuses predominantly on regional-level impacts and provides detailed consideration of port communities, while neglecting equivalent place-based scrutiny of the island communities themselves. Despite this omission, the assessment nonetheless concludes that the island communities are of low sensitivity to tourism effects, a conclusion that lacks substantiation.

This approach fundamentally misunderstands the nature of small island economies. Unlike broader regional averages, these economies are typically concentrated in sectors that are directly vulnerable to changes in the attributes that attract visitors. The dependence on visitor numbers does not mitigate sensitivity to tourism-related impacts; rather, it intensifies the vulnerability by deepening reliance on the very qualities that may be compromised by the development. Consequently, the assertion

of low sensitivity for island communities, reached without any place-specific analysis, amounts to an unfounded assumption rather than an evidence-based conclusion.

Given these deficiencies, the applicant's socio-economic assessment cannot be relied upon to inform a sound planning decision. The absence of a robust, place-based evaluation of the island communities leaves a significant gap in understanding the potential adverse effects of the proposal. Without addressing this critical shortcoming, the assessment fails to provide an adequate basis for mitigation measures or to ensure that the unique social and economic characteristics of these communities are properly protected.

The proposal fails to comply with the relevant policy and statutory duties concerning island communities. Specifically, it does not satisfy the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions affecting such communities be founded on robust socio-economic evidence and adopt a precautionary approach when evidence is insufficient. Furthermore, it disregards the provisions of NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, all of which emphasise the necessity of assessing and affording appropriate weight to the interests of island communities through meaningful engagement from the earliest stages of development to its conclusion.

The applicant has acknowledged that island communities warrant particular scrutiny; however, it has failed to undertake the necessary assessments to properly understand the effects of the proposal on these communities. Without such assessments, there is no demonstration that the proposal is compatible with the sustainability of island communities. This omission is significant, as it undermines the ability to ensure that the development will not adversely affect the social and economic well-being of those communities.

In light of these considerations, it is evident that the statutory duties owed to island communities have not been discharged. The absence of adequate evidence and engagement means that the proposal cannot be considered compliant with the established policies and statutory requirements designed to protect island communities. Consequently, the proposal should not be supported.

1.1.396 Ecology, Biodiversity and Habitats Regulations

The development site encompasses Priority Marine Features and Annex I habitats, indicating the presence of ecologically significant environments within the area proposed for construction. Surrounding waters are known to support a range of protected species, including seabirds, marine mammals, and basking sharks. The introduction of large-scale activities associated with construction, operation, and eventual decommissioning would extend over several decades, imposing sustained pressures on these sensitive marine ecosystems.

Given the ecological importance of the site and the longevity of the proposed development's operational phases, there is a substantial potential for significant adverse environmental effects. The interaction between extensive human activity and the existing marine biodiversity necessitates thorough consideration, as disturbance and habitat alteration could compromise the integrity of Priority Marine

Features and the viability of protected species populations. This assessment forms a critical basis for evaluating the environmental acceptability of the proposal.

The applicant's submission of a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan signifies an acknowledgement of potential adverse effects on the North Colonsay and Western Cliffs Special Protection Area, specifically concerning the guillemot population. Such documents are customarily prepared in circumstances where an adverse effect on site integrity cannot be definitively ruled out. This approach indicates that the applicant recognises the possibility that the Scottish Ministers may reach a different determination regarding adverse impacts than the applicant themselves. Consequently, these submissions serve as an important component of the application, intended to address and mitigate potential impacts under the relevant derogation provisions.

The applicant's evidence clarifies that under the Habitats Regulations, planning consent for developments potentially affecting protected sites can only be granted if the competent authority is satisfied that the proposal will not adversely affect the integrity of the site. This assessment must reach a standard where no reasonable scientific doubt remains regarding the absence of adverse effects, unless the proposal meets the strict derogation tests outlined in the legislation. The responsibility for demonstrating compliance with these tests lies firmly with the applicant. Furthermore, the presence of mitigation, compensation measures, or future monitoring arrangements does not, in isolation, satisfy the statutory requirements or provide a lawful basis for consent.

This legal framework is supported by the policy context, engaging not only the Habitats Regulations but also GEN 9 and GEN 13 of the National Marine Plan, as well as relevant provisions of National Planning Framework 4, specifically Policies 3, 4(b), 4(e), and 4(f). Together, these policies reinforce the stringent evidential standards that must be met to ensure the protection of designated habitats and species. In light of this comprehensive legal and policy regime, any planning consent granted without incontrovertible scientific assurance would be contrary to established statutory and policy requirements.

The applicant's submissions, including their own derogation documents, fall short of demonstrating that the statutory tests designed to safeguard internationally important habitats and species are met. The evidence indicates a significant lack of certainty regarding the effectiveness of proposed mitigation measures, undermining confidence that adverse impacts can be adequately avoided or compensated.

Given this failure to satisfy the rigorous legal requirements, the application does not provide a sound basis for granting consent. Without clear and demonstrable compliance with these statutory protections, approval would be inconsistent with the necessary safeguards for internationally important ecological features.

1.1.397 Cumulative and In-Combination Effects

The current assessment approach is fundamentally flawed because it fragments the project by deferring critical elements, thereby preventing a comprehensive evaluation

of its overall impacts. Only part of the project—the wind farm itself—is before the Scottish Ministers, while essential components such as the export cable corridor and onshore transmission works, without which the wind farm cannot operate, are reserved for later applications. This segmentation means that the effects of the entire project are never assessed collectively. Consequently, important elements are left to be considered through subsequent consenting processes after the principal decision has been made. Such an approach contravenes the legal principle established in Raeshaw Farms, which requires that a project be assessed as a whole rather than being "salami-sliced" into parts whose individual effects may appear smaller. This fragmented assessment undermines the integrity of the planning process and the ability to fully understand and mitigate the project's cumulative impacts.

The cumulative impact assessment presented is fundamentally unreliable due to its reliance on flawed baseline evaluations. By adopting the conclusions from other sections of the Environmental Impact Assessment, it inherits their understated assessments of landscape, heritage, and socio-economic effects. This initial underestimation directly leads to a diminished foundation for evaluating cumulative impacts.

When these baseline assessments fail to capture the full extent of existing and potential effects, the subsequent cumulative assessment likewise understates the combined impacts of the current proposal alongside other developments that are existing, consented, or foreseeable. Consequently, decision-makers are presented with an incomplete picture that risks undervaluing the true scale of environmental and community change.

Given this, it is essential that the cumulative impact assessment be revisited with accurate and comprehensive baseline data. Only then can the combined effects be properly understood and addressed in the planning process, ensuring decisions are made on a sound and transparent evidential basis.

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

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

In conclusion, given these shortcomings, it is essential that the decision-making process explicitly addresses the treatment of the deferred works and ensures a comprehensive evaluation of cumulative effects is conducted. Without this, the

proposal remains inconsistent with the relevant policy and regulatory framework, and approval would be premature. It is therefore requested that these matters be fully resolved before any determination is made.

1.1.398 Public Engagement, Site Selection and Environmental Information

The deficiencies in public participation and the timing of consultations have significantly undermined the legitimacy of the site-selection process, with practical consequences for the weight that the Scottish Ministers may reasonably place on it. The applicant requests substantial deference to the site-selection process; however, the quality of public engagement at both the plan and site-selection stages has been inadequate and this shortfall has persisted into the application stage. The application itself consists of many thousands of pages of technical material, yet the consultation period coincided with the busiest months for island communities, when residents are fully occupied with continuous work throughout the visitor season and when access to specialist advice is most limited. Meanwhile, the applicant has benefited from years of preparation supported by considerable professional and financial resources.

The National Marine Plan's Policy GEN 18 and the principles of effective public participation enshrined in the Aarhus Convention require that those affected must have a realistic and meaningful opportunity to engage in decisions of this scale. The conditions under which the affected communities were expected to respond plainly fall short of these standards. Consequently, it is imperative that the Scottish Ministers take these deficiencies into account when assessing the representations made, recognising the compromised nature of public participation in this process.

There remains considerable uncertainty regarding the adequacy of the Environmental Impact Assessment submitted with this application. While the EIA is extensive in scope, its sufficiency is questionable, as it identifies pathways to significant effects without fully investigating them or relying on methodologies that fail to support its conclusions. Notably, the landscape assessment applies an outcome based on distance patterns absent from its own methodology, the heritage assessment does not evidence the application of its stated integrity test, and the socio-economic assessment omits any place-based analysis of the affected islands. Such deficiencies undermine confidence in the EIA's ability to provide a comprehensive understanding of likely significant effects.

Furthermore, the application's reliance on future assessments, post-consent plans, monitoring, and additional approvals runs counter to the requirements of the EIA Regulations, which mandate that likely significant effects be understood prior to determination. The Scottish Ministers must base their decision on the evidence presently before them, not on assumptions that unresolved issues will be satisfactorily addressed at a later stage. In this case, the applicant has not demonstrated that the environmental information submitted is adequate to support an informed decision, and accordingly, the application should not be approved.

1.1.399 Effects on Local Area

The proposed development encompasses a substantial 448 square kilometre area immediately north-west of Islay and west of Colonsay, positioning these islands as

the closest communities directly affected. Despite this proximity, the applicant's assessment notably underrepresents the impacts on Islay, treating it primarily as a potential project site rather than recognising the island's own communities whose Atlantic-facing settlements confront the nearest edge of the development. This approach omits a place-based evaluation of the effects on Islay's setting, local economy, and community life. Similarly, Colonsay and Oronsay, whose daily lives are intimately connected to their seaward outlook facing the array, face direct consequences. The North Colonsay and Western Cliffs Special Protection Area, integral to Colonsay's coastline, is central to the applicant's derogation case and compensation plan, implicitly acknowledging that harm to the internationally protected seabird populations there cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance located within this community, suffers from the same deficiencies identified elsewhere in the heritage assessment, particularly regarding the evaluation of its open maritime setting. Taken together, these omissions undermine the reliability of the environmental and heritage impact evaluation for these island communities.

The applicant's assessment underestimates the significant impact that the proposed development would have on the island of Iona, leading to an incomplete evaluation of the environmental and social consequences. The Coastal Character assessment identifies the Sound of Iona as highly sensitive, with direct orientation towards the development, extensive visibility, and a large geographical extent of change spanning approximately 21 kilometres. The turbines would dominate around 39 degrees of the horizon, affecting key areas such as the ferry crossing between Fionnphort and Iona. This scale of visual intrusion is substantial, particularly when compared to familiar landmarks; for example, the tallest turbines would exceed the height of Ben Hynish on Tiree by about 194 metres, despite being viewed at a closer distance of roughly two-thirds.

Furthermore, the West Coast of Iona is acknowledged as highly sensitive with widespread visibility, and the applicant accepts that there would be significant effects on residents and visitors throughout much of the island, including at Dùn Ì, Iona's highest point. Importantly, the island's internationally significant monastic landscape, encompassing the Abbey, the Nunnery, and the high crosses, is intrinsically linked to pilgrimage and movement through the seascape. Historic Environment Scotland requested additional visual viewpoints from critical locations such as the ferry crossing, yet the applicant failed to provide visualisations from elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, leaving gaps in understanding the full heritage impact.

Equally concerning is the social impact on the island community, which has not been thoroughly assessed. A household consultation revealed that 92 per cent of respondents on Iona oppose the proposal, reflecting widespread local objection. Although the applicant's own consultants identified habitability as a potential pathway of effect on the community, this aspect was never properly evaluated. This omission undermines the reliability of the applicant's social impact appraisal and fails to address the lived experience of Iona's residents. Taken together, these factors demonstrate that the applicant's environmental and social impact evaluation for Iona is incomplete and underestimates the true scale and significance of the effects.

The applicant's assessment acknowledges significant effects on several key areas of Mull and Ross of Mull, including the Ross of Mull South coastal area, which is identified as having High sensitivity at distances of approximately 22 to 24 kilometres and is attributed a Medium magnitude of impact. Notably, significant effects are accepted at Erraid and on the Core Paths of the Ross, as well as at Fionnphort—the critical gateway to Iona and the embarkation point for visitors—where the community's experience is recognised as being significantly affected due to its direct connection to visitor flows.

Across Mull more broadly, the applicant concedes significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Areas. The Loch na Keal National Scenic Area, encompassing the western waters and islands of Mull, is assessed as having High sensitivity throughout a range of approximately 21 to 33 kilometres, yet the magnitude of impact attributed does not exceed Medium. This raises concerns regarding the adequacy of the assessment in capturing the true extent of effects within these designated landscapes.

Further, the approach taken to areas such as the Wilderness and Gribun Rocks coastal area—where the applicant reasons that the scale of change is small due to viewing distances exceeding 30 kilometres—exemplifies a reliance on distance-based criteria that may understate potential impacts. Crucially, the west-facing tourism economy of Mull, along with its wildlife boat operations and accommodation in western townships, depend heavily on the Atlantic seascape, which the proposed development would industrialise. Despite this, none of these communities have been the subject of a place-based assessment, leaving a significant gap in understanding and addressing the localised economic and community effects.

The applicant's assessment significantly underestimates the potential impacts on important designated landscapes and vulnerable island communities, with practical consequences for their ongoing regeneration and preservation. For example, Ulva, situated within the Loch na Keal National Scenic Area, is a community-owned island currently undergoing regeneration. This small, re-establishing community relies heavily on the qualities of its setting and unspoilt seascape, which are precisely those at risk from the proposed development. Yet, no specific assessment has been made regarding the effects on Ulva, thereby overlooking critical factors that could undermine the community's recovery and the natural qualities it depends upon.

Similarly, the applicant's treatment of other nearby designated landscapes appears to downplay the significance of potential effects. Staffa, also within the Loch na Keal National Scenic Area and one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development site—beyond the 30-kilometre range that NatureScot advised for assessing effects on National Scenic Area qualities. Despite this, the applicant concludes that the scale of change would be small and the effect not significant, even though its own assessment recognises the panoramic maritime qualities of the area. The Jura National Scenic Area, valued for its wild, undeveloped Atlantic outlook, is assessed as having high sensitivity but is attributed only a medium to low magnitude of effect due to distance and retained landforms. A similar approach is taken for the Scarba, Lunga and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres away. This consistent minimisation of potential impacts fails to fully acknowledge the intrinsic

qualities and designations of these landscapes, which warrants a more thorough and precautionary evaluation to ensure their protection.

The applicant's assessment categorises the South Tiree coastal area as having High sensitivity at a distance of approximately 35 kilometres, yet attributes only a Low magnitude of change to the proposed development. This characterisation warrants further scrutiny. Tiree is an exceptionally low-lying island, with its landscape character fundamentally shaped by the dominance of sea and sky. Its highest elevation, Ben Hynish, reaches merely 141 metres above sea level. Given this context, the introduction of turbines up to 335 metres in height would represent vertical elements unprecedented within Tiree's open oceanic horizon. Such structures would inevitably alter the island's distinctive seascape character in a manner far more substantial than the assessment acknowledges. Therefore, the conclusion of a Low magnitude of change for a receptor as exposed and sensitive as Tiree appears to significantly understate the true magnitude of impact, undermining the reliability of the overall evaluation.

The applicant's assessment notably omits consideration of significant effects on a range of mainland and island communities that maintain direct visual and economic connections with the seascape surrounding the proposed development area. Gigha, for example, is a community-owned island whose purchase by its residents has become emblematic of island regeneration. This community faces the development waters from the east, yet the impacts on its delicately balanced social structure and local economy remain unexamined within the applicant's documentation. This omission raises concerns about the completeness of the assessment, given Gigha's unique status and the potential for adverse consequences on its community cohesion and livelihood. Similarly, Ardnamurchan Point—recognized as the most westerly point of the British mainland—offers expansive panoramic views along the Hebridean seaboard that attract visitors along the entire peninsula. These seaward panoramas represent precisely the types of receptors subject to the distance-based impact moderation the applicant employs, suggesting that the assessment underestimates or overlooks important visual and experiential effects on a key visitor destination.

In addition to these, the west coast of Kintyre comprises a series of communities whose identity, landscape character, and visitor economy are intrinsically linked to the open Atlantic seaboard facing Islay, Jura, and the surrounding waters. The Treshnish Isles, together with other small islands and adjacent mainland coasts with views toward the development area, share this vulnerability. Their exclusion from a thorough assessment undermines the understanding of cumulative and indirect effects on the wider seascape and associated human receptors. Given the interconnectedness of these communities with the marine environment, the failure to evaluate their exposure and potential economic impact results in a fragmented and insufficient appraisal. Consequently, the applicant's assessment cannot be considered comprehensive, and this gap compromises the robustness of the planning evaluation process.

The applicant's environmental impact assessment employs a distance-based methodology that systematically moderates the magnitude of change and discounts the significance of effects on sensitive receptors located beyond approximately 20

kilometres. This approach is evident in the treatment of numerous highly sensitive locations, where the assessment reduces the perceived impact with increasing distance, effectively diminishing the weight given to changes experienced by these receptors. As a result, the assessment fails to provide a comprehensive, place-based analysis for the communities residing beyond this threshold, who nonetheless endure the consequences of the proposed development.

This systematic moderation and discounting undermine the integrity of the environmental impact assessment by neglecting the real and potentially significant effects on distant but sensitive receptors. The absence of detailed, location-specific evaluation for these communities means that their experiences and the full extent of environmental change are neither adequately recognised nor addressed. Consequently, the assessment's reliance on a rigid distance metric results in an incomplete understanding of impacts, potentially compromising the robustness and fairness of the decision-making process.

1.1.400 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the relevant statutory and policy requirements governing its determination. The applicant's own documentation acknowledges significant impacts upon nationally designated landscapes, as well as on the cultural heritage and communities along this coastal region. Independent reviews of the submitted materials reveal that these impacts have been understated, with a comprehensive heritage assessment notably absent. Moreover, while effects on the island communities impacted by the development were identified, no formal assessment of these impacts has been undertaken. The ecological criteria necessary for approval have not been demonstrated to be achievable. Additionally, it should be noted that only a portion of the project is currently subject to consideration by the Scottish Ministers.

In light of these shortcomings, it is respectfully urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm and decline to grant the associated marine licence. Should the Ministers decide against refusal, it is requested that they require the submission of further environmental information alongside enhanced visual representations. Furthermore, it is recommended that the applications be determined only following a public inquiry, thereby allowing thorough examination of the concerns raised within this objection. Regardless of the final decision, it is also requested that the Ministers provide explicit conclusions in their decision statement concerning the effects on cultural heritage and the affected island communities.

Yours faithfully,

[Redacted]

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

Member of the public 542
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, referenced by applications 00012385 and 00012386. These relate respectively to consent sought under section 36 of the Electricity Act 1989 and a marine licence application pursuant to Part 4 of the Marine (Scotland) Act 2010, both submitted by MachairWind Limited, trading as ScottishPower Renewables. I request that this objection be officially recorded and that I be informed of the final determination in these matters.

The proposals envisage the construction of an offshore wind farm with a generating capacity of approximately 2 gigawatts. This development would comprise between 91 and 144 wind turbines, each with a maximum blade tip height of up to 335 metres. The designated Windfarm Development Area encompasses around 448 square kilometres of marine space situated to the north-west of Islay and west of Colonsay. The site lies approximately 21 kilometres from the island of Iona and is in close proximity to various islands and coastal communities within the southern Hebrides.

The following sections detail the grounds for objection, framed in the context of the statutory and policy criteria governing the determination of these applications. It is essential to emphasise that the responsibility lies with the applicant to provide sufficient evidence demonstrating compliance with all relevant planning and environmental tests. Objectors are not obliged to establish the contrary. In this instance, the applicant has failed to meet this evidentiary burden, and accordingly, the applications should be refused consent.

1.1.401 Seascape, Landscape and Visual Effects

The applicant’s written methodology, as set out in Appendix 16.1, notably lacks any specified distance threshold beyond which major effects cease. Nevertheless, an independently prepared Evidence Note, which draws entirely upon the applicant’s own Chapter 16 and Appendices 16.1 to 16.3, reveals a clear and consistent pattern across all three streams of assessment. This pattern demonstrates that no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of the receptor’s sensitivity or the extent of visibility. Furthermore, the applicant’s own documentation explicitly acknowledges the influence of distance on effect judgements. For example, the assessment of a coastal area situated over 30 kilometres from the site concludes that, given the viewing distance, the scale of change is considered small. Similarly, the Landscape Character synthesis categorises magnitude as High within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types.

This reliance on distance as a moderating factor in the assessment has significant implications for the reliability of the conclusions drawn. By systematically reducing the magnitude of effects at the very distances where the most sensitive designated landscapes are located, the inputs to the protective tests are effectively understated. As a result, the final assessments presented do not provide a dependable

description of the likely effects that the Scottish Ministers are being asked to consent to. Such an approach risks underrepresenting the true impact on sensitive receptors and consequently undermines the robustness of the decision-making process.

The practical consequence of relying on the visualisation materials submitted in support of the assessment is that they may not accurately convey the true scale of the development as experienced on site. NatureScot's visualisation guidance, which the applicant follows, explicitly recognises that printed visualisations cannot fully replicate the scale perceived by a viewer in the field. This inherent limitation means that any conclusions drawn solely from these materials should be treated with caution, as they risk understating or misrepresenting the visual impact.

Moreover, the wireline drawings included within the same panoramic projections do not overcome these deficiencies. Rather than serving as an independent means to correct or clarify the photographic visualisations, they are technical renderings subject to the same constraints. As such, they should be understood as part of the overall visualisation package, sharing its limitations, rather than as a definitive or corrective representation of the development's visual effects. This understanding is important for a balanced appraisal of the visual evidence presented.

While mitigation measures may seek to minimise the visual impact of the proposed development during daylight hours, they cannot address the fundamental alteration introduced by the required aviation and navigation lighting. The existing night-time seascape benefits from an absence of artificial illumination, presenting a naturally dark horizon that contributes significantly to its character. The installation of lighting for safety and operational compliance would permanently change this character throughout the 35-year operational life of the development, creating a new and continuous source of brightness that is currently absent.

Furthermore, the temporal limitation of 35 years does not diminish the policy implications of this harm. Granting consent for this development effectively endorses the suitability of this seascape for wind farm use, including the acceptance of its altered night-time character. This sets a precedent that may undermine the protection of seascape qualities valued in planning policy. Therefore, the impact of lighting on the night-time seascape character must be given substantial weight in the decision-making process, recognising that mitigation cannot fully preserve the existing environmental and visual qualities of the site.

The proposed development's assessment of landscape and seascape effects fails to adequately demonstrate compliance with the relevant planning policies designed to safeguard these nationally important environments. While some mitigation measures have been proposed, the applicant's conclusions regarding the scale of the identified effects lack consistency when measured against its own established methodology. This discrepancy undermines confidence in the effectiveness of the proposed mitigation and calls into question whether the residual impacts have been properly accounted for in line with policy expectations.

Furthermore, the proposal does not satisfy the requirements set out in NPF4, specifically Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively emphasize

the need to protect significant landscape and seascape assets from adverse effects. The applicant has not provided sufficient evidence to demonstrate that its scheme respects these protections or that any unavoidable effects have been minimised to an acceptable degree. As such, the proposal does not meet the necessary policy tests for development in sensitive landscape and seascape settings.

1.1.402 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment fails to demonstrate compliance with the required methodology for evaluating impacts on the setting of historic assets, thereby undermining the reliability of its conclusions regarding heritage harm. Although the applicant adopts Historic Environment Scotland's established methodology—developed through consultation and requiring a specific evaluative step to determine whether changes affect the contribution setting makes to cultural significance and whether the integrity of setting is retained—the published Methodological Audit identifies a critical omission. The Audit, based solely on the applicant's Appendix 14.3, finds that while the operational assessment describes visual changes such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it does not show how the integrity of setting has been assessed in line with the methodology's explicit requirement. Instead, the assessment concludes without evidencing this evaluative step, leaving the claimed retention of setting integrity unsubstantiated. This fundamental gap calls into question the robustness of the applicant's heritage impact conclusions.

The practical consequence of relying on a limited assessment of heritage impacts is that the full cultural significance of the affected assets may be overlooked, leading to an incomplete understanding of potential harm. The applicant's baseline acknowledges that this significance arises from dynamic qualities such as pilgrimage routes, arrival by sea, and movement through a living cultural landscape. These aspects emphasize the relationships between monuments, spirituality, and the surrounding landscape and seascape, which are experienced sequentially rather than from static viewpoints.

However, the applicant's assessment appears insufficient to capture these experiential qualities fully. Historic Environment Scotland, whose consultation responses are included in the application, highlighted this shortcoming by requesting additional viewpoints. Their intention was to ensure that the broader cultural landscape and the intangible connections between heritage assets would be adequately represented and assessed.

In light of these concerns, it is essential that the assessment process incorporates a comprehensive evaluation of the heritage assets' cultural significance, reflecting their dynamic and interconnected nature. Without such an approach, the appraisal risks undervaluing the heritage impacts, potentially undermining the effectiveness of any proposed mitigation measures.

The heritage impact conclusions presented rely fundamentally on the underlying landscape assessment. As identified, where the landscape effects have been understated, this shortcoming directly influences the accuracy and reliability of the heritage conclusions derived from that assessment. The inherent dependency

means that any minimisation of landscape impacts inevitably leads to a corresponding understatement in the evaluation of heritage effects.

Consequently, the credibility of the heritage impact conclusions is compromised by the deficiencies in the landscape assessment. Without an accurate and thorough appraisal of landscape effects, the heritage impacts cannot be properly understood or mitigated, thereby undermining the overall robustness of the planning case. This interdependency highlights the need for a more comprehensive and transparent landscape assessment to ensure that heritage impacts are not underestimated.

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

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

1.1.403 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development rely heavily on visitor numbers, with the latter drawn specifically by the very qualities the applicant's own baseline assessments identify: landscape, seascape, cultural heritage, tranquillity and remoteness. Any alteration to these attributes would directly undermine the fundamental economic base that sustains these communities. This dependency means that changes to the environment risk precipitating a decline not only in tourism revenue but also in essential local services and population stability.

Such a decline poses a serious threat to the long-term viability of these island settlements. The economic and social sustainability of the islands is intrinsically linked to the preservation of their unique visitor-attracted characteristics. Therefore, the proposal's impact on these key qualities must be given paramount consideration, as it jeopardises the continued existence and prosperity of the island communities themselves.

The applicant's failure to assess the habitability of the affected islands has practical consequences that undermine confidence in the socio-economic conclusions presented. While their own consultants identified habitability as a significant potential impact pathway, the subsequent assessment in Chapter 18 addresses only regional port communities in detail, neglecting any comparable place-based analysis of the

island communities directly facing the proposed development. This approach results in an unsupported conclusion that these island communities exhibit low sensitivity to tourism effects, which risks overlooking specific and localized vulnerabilities.

This methodological flaw is particularly concerning given the unique economic characteristics of small island communities. Their economies are concentrated in sectors highly sensitive to changes in the qualities that attract visitors, and increased dependence on visitor numbers intensifies this sensitivity rather than diminishes it. The absence of a detailed, place-based assessment renders the conclusion of low sensitivity not as evidence-based but as an unsubstantiated assumption. Therefore, the socio-economic assessment as presented is insufficient to understand or mitigate the potential impacts on island communities.

The proposal fails to comply with critical policy and statutory requirements designed to protect island communities, as it does not provide the necessary socio-economic evidence mandated by GEN 19 and paragraph 4.81 of the National Marine Plan. These provisions necessitate decisions to be grounded in robust evidence and to adopt a precautionary approach where such evidence is insufficient. Furthermore, the proposal does not meet the standards set out in NPF4 Policy 11(c) or the Islands (Scotland) Act 2018, both of which emphasise that the interests of island communities must be thoroughly assessed and afforded appropriate weight through meaningful engagement from the outset to the conclusion of the decision-making process.

Significantly, the applicant has acknowledged that island communities warrant particular scrutiny but has failed to undertake the necessary assessment to understand how the proposal would affect them. This omission means that the applicant has not demonstrated compatibility with the principles of sustainable island communities, nor has it discharged the statutory duties owed to these populations. The absence of this critical analysis undermines confidence in the proposal’s adherence to essential planning and statutory frameworks.

In light of these substantial shortcomings, the proposal cannot be considered compliant with the required standards for assessing and protecting island communities. It therefore should be refused on the grounds that it fails to meet the legal and policy obligations designed to safeguard the socio-economic wellbeing and sustainability of island communities.

1.1.404 Ecology, Biodiversity and Habitats Regulations

There is uncertainty regarding the full extent of ecological impacts arising from the proposed development, given its location within an area containing Priority Marine Features and Annex I habitats. These sensitive environmental assets lie directly within the development zone, while the adjacent waters provide habitat for various protected species, including seabirds, marine mammals and basking sharks. The scale of construction, operational activities and eventual decommissioning envisaged would occur over several decades, raising concerns about potentially significant adverse effects on this ecologically important marine environment. Consequently, it is imperative that these considerations are thoroughly addressed before the proposal proceeds.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically addressing the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are typically prepared where it cannot be confidently ruled out that the proposed development would adversely affect the integrity of the protected site. Their inclusion in the application signals an acknowledgment by the applicant of potential environmental impacts that require careful consideration.

Such submissions indicate that, according to the applicant's own assessment, there remains a possibility that the Scottish Ministers might reach a different conclusion regarding adverse effects on the protected site's integrity. This reflects a precautionary approach, recognising the significance of the designated area and the need for appropriate measures should impacts be confirmed. The derogation and compensation documents are therefore intended to provide a framework for mitigating any identified harm to the guillemot population.

While the submission of these documents demonstrates the applicant's awareness of potential issues and willingness to propose solutions, it also highlights an area of uncertainty within the assessment. The effectiveness of the compensation plan and the acceptability of derogation measures will ultimately require thorough scrutiny. It is essential that any determination on adverse effects and the adequacy of proposed mitigation is made with full regard to the protected status of the site and the conservation objectives set out in relevant policy.

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

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

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

The applicant's submitted evidence, notably their own derogation documents, fails to establish that the statutory tests designed to protect internationally important habitats and species have been satisfied. These documents reveal significant uncertainty

regarding the potential impacts on these ecological features, undermining the applicant's position that the legal requirements for such protections are met. The statutory framework demands a clear demonstration that all relevant tests are fulfilled before consent can be granted, yet this essential threshold has not been reached based on the information provided.

This lack of demonstrable compliance with statutory safeguards calls into question the validity of the application as it currently stands. Without satisfying these legal protections, there is insufficient justification to proceed with granting consent, given the potential for harm to internationally significant ecological assets. Consequently, the application should not be approved until the applicant can conclusively show that all statutory tests protecting these habitats and species are fully met.

1.1.405 Effects on Local Area

The applicant's assessment significantly underestimates the scale and significance of the visual, community, and heritage impacts on Iona, leading to an inaccurate evaluation of the environmental and social effects of the proposal. The Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity, with direct orientation towards the development site and extensive visibility. The predicted geographical extent of change is large, affecting an area approximately 21 kilometres away, with turbines extending across roughly 39 degrees of the horizon. This scale of visual impact is considerable, particularly when compared to familiar landmarks; for instance, Ben Hynish on Tiree, which is 141 metres high and visible from Iona at 33 kilometres, would be visually dominated by the largest turbines, which would exceed Ben Hynish's height by about 194 metres at a closer distance of roughly two-thirds that range.

The west coast of Iona is similarly characterised by high sensitivity and widespread visibility. The applicant acknowledges significant effects for residents and visitors across much of the island, including at Dùn Ì, Iona's highest point. However, despite the acknowledged sensitivity of the island's monastic landscape—encompassing the internationally important Abbey, Nunnery, and high crosses, whose significance is intimately connected to pilgrimage, arrival by sea, and movement through the landscape—the applicant's assessment falls short. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet no visualisation has been provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, a notable omission that undermines a full understanding of the visual effects on heritage assets.

Community concerns further reinforce the inadequacy of the assessment. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal. Despite this clear community response, the applicant's consultants did not assess habitability, which they themselves identified as a potential pathway of effect on the island's community. This represents a significant gap in the social impact evaluation.

In conclusion, the applicant's environmental and social impact assessment does not fully reflect the magnitude or importance of the effects on Iona's landscape, heritage, and community. The oversight of critical viewpoints, failure to assess habitability, and

underestimation of visual scale collectively compromise the accuracy and reliability of the evaluation. Consequently, the scale and significance of impacts on Iona must be reconsidered with greater rigour and comprehensiveness.

There remains considerable uncertainty as to whether the applicant's assessment fully captures the extent of significant effects on the Mull and Ross of Mull coastal communities and landscapes. Notably, the Ross of Mull South coastal area is recognised as having high sensitivity at distances of approximately 22 to 24 kilometres and is attributed only a medium magnitude of impact. The applicant concedes significant effects at Erraid, on the Ross Core Paths, and at Fionnphort—the crucial gateway to Iona and primary embarkation point for visitors—yet this community, intimately linked to visitor flows, has not been adequately considered beyond this acknowledgement. Similarly, significant effects are accepted across Mull on Core Paths and within key local landscape areas including Central, South, and West Mull. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is assessed as highly sensitive at distances between 21 and 33 kilometres but is nonetheless attributed no more than medium magnitude impacts, suggesting an underestimation of potential harm. The applicant's approach to the Wilderness and Gribun Rocks coastal area, where a viewing distance exceeding 30 kilometres leads to a conclusion of small scale change, exemplifies a reliance on distance-based reasoning that may overlook the qualitative significance of industrialising views in these sensitive landscapes. Moreover, the west-facing tourism economy of Mull—including wildlife boat operations and accommodation sectors in western townships—depends fundamentally on the integrity of the Atlantic seascape, which this development would industrialise. Crucially, none of these communities has been the subject of a detailed, place-based assessment. Taken together, these points demonstrate that the applicant's evaluation inadequately addresses the full scope of visual, economic, and community impacts on these designated landscapes and tourism-dependent communities, underscoring the need for a more rigorous and locally informed appraisal.

1.1.406 Personal Observations

Based on my own local knowledge, I also wish to highlight that: I am concerned about the effects upon the seabed, the negative effects to both wildlife and their food supply.

Finally, I would also ask the Scottish Ministers to consider: I have been an Iona pilgrim, spending time as a volunteer in the Iona Community. The importance of the sanctity of the Iona space, including its seascape surroundings, is difficult to define but its spiritual import is profound. Any threat to the island and its surrounds in terms of visual impact, heating of the water (which could affect the sea level and wildlife) and the impact of the construction phase of the project are a threat to the indefinable spiritual import of the island, a heritage which is of immense value.

1.1.407 Summary

The proposal for the MachairWind Offshore Wind Farm fails to meet the statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges considerable impacts on nationally designated landscapes, as well as

on the local communities and cultural heritage of the coastal region. Furthermore, analysis of the applicant's submitted documentation reveals that these impacts have been underestimated, and a comprehensive heritage assessment, as mandated, has not been completed. While the implications for the island communities affected by the development were identified, they have not been subjected to proper assessment. Additionally, the ecological criteria necessary for approval remain unproven, and notably, only a portion of the overall project has been presented for consideration by the Scottish Ministers.

Given these deficiencies, it is respectfully submitted that the Scottish Ministers should decline consent for the proposed offshore wind farm and refuse the corresponding marine licence. Should the Ministers decide against refusal, it is requested that they seek further environmental information and enhanced visual representations, and that the applications only be determined following a public inquiry. Such an inquiry would enable thorough examination of the concerns raised in this objection. Irrespective of the decision reached, it is also requested that the Ministers explicitly address and articulate their conclusions regarding the effects on cultural heritage and the impacted island communities within their formal reasons.

Yours faithfully,

[Redacted]

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

Member of the public 543
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, which are currently under consideration through application 00012385 seeking consent pursuant to section 36 of the Electricity Act 1989, alongside application 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. These applications, lodged by MachairWind Limited, a subsidiary of ScottishPower Renewables, require thorough scrutiny, and I request that my objection be officially recorded and that I receive notification of the final determination.

The proposal concerns the development of an offshore wind farm with a capacity of approximately 2 gigawatts. The project entails installation of between 91 and 144 turbines, each with a maximum height reaching 335 metres to blade tip. The designated Windfarm Development Area spans some 448 square kilometres of marine environment situated to the north-west of the island of Islay and west of Colonsay. The site lies roughly 21 kilometres from Iona and is proximate to numerous islands and coastal settlements within the southern Hebrides, thereby raising significant environmental and community concerns.

My objections are grounded in planning and environmental considerations evaluated against the relevant statutory and policy frameworks governing these applications. It is important to emphasise that the onus lies solely with the applicant to demonstrate, through robust and adequate evidence, that all applicable planning tests and regulatory requirements are satisfied. The role of objectors is not to disprove the applicant’s case but to highlight where this burden has not been met. Upon detailed examination, it is clear that MachairWind Limited has failed to discharge this responsibility adequately. Consequently, the applications should be refused consent.

1.1.408 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to comply with multiple National Planning Framework 4 (NPF4) policies designed to protect nationally important landscapes, heritage assets, and biodiversity. Policy 11 is to be read alongside Policy 4(c) and 4(d), which safeguard National Scenic Areas and other nationally important landscapes from significant adverse effects on the qualities for which they are designated. Additionally, Policy 7, including section 7(h) on scheduled monuments and 7(c) and 7(d) concerning the setting of historic assets, alongside Policy 3 on biodiversity, establishes a comprehensive framework for the protection of these critical assets.

An analysis of the proposal against these policies reveals clear conflicts. The development would cause significant adverse effects on nationally designated landscapes and seascapes, undermining the reasons for their designation. Furthermore, the submission has not demonstrated that the cultural significance of scheduled monuments and their settings would be preserved. It also fails to show adequate safeguards for island communities. Lastly, the ecological tests required by Policy 3 have not been evidenced as capable of being met. Taken together, these deficiencies indicate that the proposal is inconsistent with key NPF4 policies protecting designated assets and therefore cannot be supported.

The practical consequence of the proposal is that it would cause adverse effects on the landscape, heritage, and community interests that the Argyll and Bute Local Development Plan 2 seeks to protect. These impacts are directly relevant to the terrestrial environment and the land-based experiences of residents and visitors alike.

Such effects represent a clear conflict with the policies set out in the Local Development Plan, which forms part of the statutory development plan framework for the area. Given the nature of these adverse impacts, the proposal does not align with the overarching objectives to safeguard the character and value of the local environment.

In addition, the proposal is also inconsistent with National Planning Framework 4 when considered in its entirety. The applicant has not provided sufficient evidence to demonstrate otherwise, leaving the proposal fundamentally at odds with both local and national planning policy frameworks.

1.1.409 Seascape, Landscape and Visual Effects

The introduction of aviation and navigation lighting associated with the proposed development would permanently alter the night-time character of the currently unlit sea horizon for the entire 35-year operational period. This change is not merely a temporary effect limited to the lifespan of the development; rather, consenting to this proposal effectively acknowledges that the seascape is appropriate for wind farm use, with all attendant visual and environmental implications. Such a decision sets a precedent for the acceptability of lighting impacts in this sensitive seascape, fundamentally changing its character in a manner that should be carefully weighed against relevant policy considerations.

There remains significant uncertainty regarding the proposal’s compliance with key policies designed to safeguard landscape and seascape interests. Although certain effects have been acknowledged, the applicant has failed to demonstrate that its conclusions on the scale of these effects align with its own established methodology. This lack of clarity undermines confidence in the assessment’s reliability and the overall robustness of the supporting evidence.

Furthermore, the proposal does not adequately comply with the relevant provisions of NPF4, specifically Policies 4(c) and 4(d), 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively protect nationally important landscapes and seascapes, yet the applicant has not shown that the proposal meets these requirements. In light of this non-compliance, the proposal should be refused.

1.1.410 Cultural Landscape, Archaeology and Historic Environment

The practical consequence of the applicant’s flawed assessment methodology is that the reliability of their conclusions regarding heritage impacts is fundamentally undermined. Despite adopting Historic Environment Scotland’s recognised approach for evaluating effects on the setting of historic assets, the applicant’s assessment fails to demonstrate the critical evaluative step required by that methodology. This

omission raises serious concerns about the validity of the claim that the integrity of setting is adequately retained.

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

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

There remains significant uncertainty as to whether the application complies with essential policies safeguarding heritage assets. Specifically, it engages National Planning Framework 4 (NPF4) Policy 7(h) concerning scheduled monuments, alongside Policies 7(c) and 7(d) relating to setting, as well as GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Crucially, the applicant has failed to demonstrate that the cultural significance of internationally and nationally important heritage assets and their settings will be protected. Furthermore, the Scottish Ministers have not been provided with the necessary assessment to support such a conclusion. In the absence of this critical evidence, the proposal does not meet key policy requirements for heritage protection and, therefore, cannot be considered acceptable.

1.1.411 Effects on Island Communities, Tourism and the Local Economy

While mitigation measures may seek to address certain impacts, they fall short in safeguarding the essential qualities that underpin the economic and social fabric of the island communities affected by this proposal. These communities depend to an exceptional degree on visitors, who are drawn specifically by the attributes identified in the applicant's own baseline assessments: landscape, seascape, cultural heritage, tranquillity and remoteness. Any alterations to these defining characteristics strike directly at the economic base of these communities. Such a disruption threatens not only local services and population stability but also the long-term viability of these island communities themselves. Consequently, the proposal poses a fundamental risk to their economic and social sustainability.

The proposal fails to meet the necessary standards for assessing and protecting island communities as required by relevant policies and statutory duties. Unlike proposals that demonstrate a precautionary approach supported by sound socio-economic evidence, this application lacks the rigorous assessment mandated by GEN 19 and paragraph 4.81 of the National Marine Plan. Furthermore, it does not

comply with NPF4 Policy 11(c) or the requirements of the Islands (Scotland) Act 2018, which emphasise the importance of meaningful engagement with island communities from the inception to the conclusion of decision-making processes.

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

1.1.412 Ecology, Biodiversity and Habitats Regulations

The applicant has acknowledged the potential for adverse effects on the North Colonsay and Western Cliffs Special Protection Area by submitting a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan. These documents specifically address the guillemot population within the designated site and are indicative of the applicant's recognition that the proposed development may impact the integrity of this protected area.

Such submissions are typically prepared where an adverse effect on site integrity cannot be conclusively ruled out, demonstrating a precautionary approach to the potential environmental impacts. The applicant's own position suggests that Scottish Ministers might arrive at a different conclusion regarding the likelihood or extent of harm, underscoring the significance of these documents within the planning assessment process.

In considering developments affecting protected habitats, it is important to recognise that mitigation measures, compensation proposals, and future monitoring alone are insufficient to satisfy the legal requirements under the Habitats Regulations. While such measures may form part of the overall assessment, they do not in themselves eliminate reasonable scientific doubt regarding potential adverse effects on site integrity. Consequently, consent may only be lawfully granted where the competent authority has ascertained, beyond reasonable scientific doubt, that the proposal will not adversely affect the integrity of the protected site or where the strict derogation tests have been met.

This stringent evidential standard places the burden of proof squarely on the applicant, who must provide clear and convincing evidence that the statutory tests are satisfied. The legal framework governing this process is supported by several policy instruments, including GEN 9 and GEN 13 of the National Marine Plan as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). These policies collectively reinforce the imperative to protect designated habitats and species by ensuring that development consent is not granted unless the highest standards of environmental protection are demonstrably upheld.

Accordingly, the decision-making process must be rigorous and precautionary, reflecting the high threshold established by law and policy. It is therefore essential that proposals are accompanied by robust, scientifically sound evidence that fully

addresses potential impacts, rather than relying primarily on mitigation or compensatory measures. Only by meeting this exacting standard can the integrity of protected sites be safeguarded in accordance with the Habitats Regulations and relevant planning policies.

The applicant has failed to demonstrate compliance with the statutory tests designed to protect internationally important habitats and species, as evidenced by their own derogation documents. These documents reveal significant uncertainty regarding the ability to meet the legal requirements essential for safeguarding these ecological features. Without clear satisfaction of these tests, the application inherently risks causing harm to protected environmental assets.

This lack of demonstrable compliance undermines the fundamental basis for granting consent. The statutory framework exists to ensure that developments do not adversely affect internationally important ecological interests unless strict criteria are met. The evidence before the decision-maker does not provide the necessary assurance that these criteria have been fulfilled, meaning the application falls short of the legal standards required for approval.

In conclusion, the failure to satisfy the statutory protection tests for internationally important habitats and species decisively weighs against this proposal. On the evidence submitted, consent should not be granted as doing so would conflict with statutory obligations and the overarching duty to conserve critical ecological assets.

1.1.413 Cumulative and In-Combination Effects

The practical consequence of the current assessment approach is that it fails to provide a complete and coherent evaluation of the project's impacts. By considering only part of the development before the Scottish Ministers—specifically excluding the export cable corridor and onshore transmission works—key components without which the wind farm cannot function are omitted from the initial decision-making process. This fragmentation means that the cumulative effects of the entire project are not assessed together, undermining the ability to fully understand and mitigate potential adverse impacts at this critical stage.

Such a piecemeal method of assessment is legally and procedurally flawed. As established in the Raeshaw Farms case, the courts have affirmed that projects must be evaluated in their entirety rather than being artificially divided into smaller parts whose individual effects may appear less significant. The current approach of deferring essential elements to later applications contravenes this principle by effectively salami-slicing the project. This risks masking the true scale and significance of the development’s impacts, thereby compromising the integrity of the planning process.

In conclusion, the assessment as presented cannot be considered comprehensive or consistent with established legal precedent. It is essential that the export cable corridor and onshore transmission works be included within the scope of the initial evaluation to ensure that the project’s effects are fully and transparently considered. Only then can the decision-making process properly reflect the entirety of the proposed development and its implications.

The cumulative impact assessment significantly underestimates the true combined effects of the proposed development in conjunction with other existing, consented, and foreseeable projects. This understatement arises because the assessment relies on baseline conditions that have themselves been inaccurately evaluated. Consequently, any quantified measure of cumulative change is inherently flawed, as it reflects a diminished starting point rather than the full extent of existing impacts.

This issue stems from the Environmental Impact Assessment's treatment of landscape, heritage, and socio-economic factors. The evidence demonstrates that these foundational assessments have understated the magnitude and severity of effects, leading to a cumulative assessment that perpetuates these inaccuracies. By adopting this reduced baseline, the cumulative effects are inevitably presented as less significant than they truly are, undermining the reliability of the entire assessment process.

In light of these considerations, the cumulative impact assessment cannot be regarded as a robust or dependable basis for decision-making. It fails to capture the full scope of combined effects, thereby obscuring potential harm to the environment and communities. It is essential that this flaw be acknowledged and rectified to ensure that cumulative impacts are properly understood and addressed before any approval is granted.

1.1.414 Effects on Local Area

The applicant's assessment falls short in adequately addressing the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, undermining the reliability of the environmental and heritage impact evaluation. While mitigation and compensation measures are proposed for internationally protected seabird populations along Colonsay's North Colonsay and Western Cliffs Special Protection Area, these acknowledge that harm cannot be excluded but do not extend to a full place-based evaluation of the wider community impacts. Islay, situated immediately south-east of the 448 square kilometre development area, is principally considered only as a potential project location rather than as a community whose Atlantic-facing settlements confront the nearest edge of the array. This oversight results in no substantive assessment of effects on Islay's setting, economy, or community life. Similarly, Colonsay and Oronsay's seaward outlooks, integral to daily life and cultural identity, face the array directly, yet the application fails to adequately assess the implications for these communities. Of particular concern is Oronsay Priory, a scheduled monument of national importance located within this area, whose open maritime setting is insufficiently addressed given the acknowledged gaps in the heritage assessment. Collectively, these deficiencies demonstrate that the applicant's evaluation does not reliably capture the full extent of impacts on these island communities, calling into question the sufficiency of the proposed mitigation and compensation measures.

The applicant's assessment of impacts on designated landscapes beyond the immediate development area appears to underestimate the significance of effects when compared to established mitigation thresholds. For instance, although NatureScot requested assessment of effects on National Scenic Area (NSA) qualities up to approximately 30 kilometres, the applicant considers the effect on

Staffa—one of Europe's most celebrated small islands located about 35 kilometres away—as small and not significant, despite acknowledging its panoramic maritime qualities. Similarly, the Jura NSA, designated for its wild and undeveloped Atlantic character, is assessed at around 28 to 32 kilometres with a High sensitivity rating but assigned only a Medium to Low magnitude of effect, justified by distance and retained landforms. This approach also extends to the Scarba, Lunga and the Garvellachs NSA, situated roughly 35 to 40 kilometres from the site, where comparable moderate effects are assumed.

Moreover, the assessment fails to consider Ulva, an island within the Loch na Keal NSA that shares the full effects on that designated landscape. Ulva is a community-owned island at the early stages of regeneration, dependent on the unspoilt seascape qualities that are at risk. The absence of any dedicated assessment of Ulva's recovery prospects and its reliance on the setting's natural and cultural attributes represents a significant omission.

Taken together, these points indicate that the applicant's evaluation does not fully capture the extent or the importance of potential impacts on wider seaboard designated landscapes and vulnerable island communities. This shortfall undermines the robust protection of their natural and cultural qualities that the designations seek to ensure.

The applicant's reliance on a distance-based methodology that systematically moderates and discounts effects beyond approximately 20 kilometres results in a significant underestimation of impacts on highly sensitive receptors. This approach effectively diminishes the reported magnitude of change for communities located beyond this threshold, yet these communities have not been subject to any place-specific assessment. Consequently, the environmental impact assessment lacks integrity, as it fails to fully recognise or address the genuine extent and severity of effects experienced by those sensitive receptors beyond 20 kilometres. This omission undermines confidence in the assessment's conclusions and calls for a more comprehensive, place-based evaluation of impacts irrespective of distance.

1.1.415 Personal Observations

In addition to the planning matters above, I am personally concerned because: As a regular visitor to the area as a Scottish tourist. I will not return if this project goes ahead as it will have totally destroyed all that is precious about the area. i weep for the people who live there.

Based on my own local knowledge, I also wish to highlight that: I had believed that the precious West coast and offshore islands were to be protected from these awful developments which will destroy the environment and wildlife. It seems nothing is sacred.

1.1.416 Summary

The proposal for the MachairWind Offshore Wind Farm fails to demonstrate compliance with the relevant statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges significant impacts on

nationally designated landscapes, as well as on the local communities and heritage along this coastal region. Furthermore, independent reviews of the applicant's documentation reveal that the extent of these impacts has been underestimated. Crucially, the necessary heritage assessment has not been undertaken. Additionally, while the effects on the island communities involved were identified, no formal assessment of these impacts has been completed. The ecological criteria applicable to the project have also not been shown to be achievable. It should be noted that Scottish Ministers are currently considering only part of the project.

In light of these deficiencies, I respectfully urge Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to reject the related marine licence application. Should the Ministers decide against refusal, I request that they require the submission of further environmental information alongside enhanced visual representations of the project. Moreover, I contend that the applications should not be determined without the benefit of a public inquiry, during which the concerns raised in this objection can be thoroughly examined. Regardless of the final decision, I also seek a clear and explicit statement from the Ministers addressing the impacts on cultural heritage and the affected island communities within their decision reasons.

Yours faithfully,

[Redacted]

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

Member of the public 544
Dear Sir/Madam,

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

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

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

1.1.417 Seascape, Landscape and Visual Effects

The applicant’s assessment methodology, as outlined in Appendix 16.1, notably lacks a specified distance threshold beyond which major effects are considered to cease. However, an independently prepared Evidence Note, drawing solely from the applicant’s Chapter 16 and associated appendices, reveals a consistent pattern across all assessment streams: no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, irrespective of its inherent sensitivity or the extent of visibility. Furthermore, the applicant’s own documentation explicitly acknowledges the influence of distance on their judgements, with examples such as a coastal area over 30 kilometres distant being assessed as experiencing only a small scale of change. Their Landscape Character synthesis further delineates High magnitude effects within roughly 20 kilometres, Medium effects between 20 and 30 kilometres, and Low effects beyond 30 kilometres for certain landscape types.

This implicit distance-based moderation of magnitude inputs has significant implications for the reliability of the assessment’s conclusions. By systematically reducing the magnitude of change at distances coinciding with the location of the most sensitive designated landscapes, the protective tests are effectively applied to understated effects. Consequently, the resulting conclusions fail to provide a dependable description of the landscape and visual effects that the Scottish Ministers must consider in their decision-making process. Such methodological

limitations cast doubt on the accuracy of the predicted effects and warrant careful reconsideration to ensure that the true extent of impact is comprehensively understood.

The applicant's submission incorporates NatureScot's visualisation guidance, which explicitly recognises inherent limitations in the visual materials presented. This guidance acknowledges that printed visualisations are unable to fully replicate the true scale as perceived by a viewer on site. Consequently, any photographic or graphic representation within the assessment, including wireline drawings, must be understood as technical renderings rather than exact reproductions of the visual experience. The wireline drawings, although included within panoramic projections, share the same constraints as the accompanying photography and do not serve as independent corrections or enhancements to the visual evidence.

This recognition of the technical and perceptual constraints is critical in interpreting the visualisation materials used to support the planning assessment. It underscores the necessity of considering such evidence as indicative rather than definitive, given that the viewer's perception in the field may differ substantially from what is captured and reproduced in printed or digital formats. By acknowledging these limitations, the applicant's evidence provides a balanced and transparent framework for evaluating the visual impact, ensuring that decision-makers understand the contextual boundaries within which the visual assessment has been prepared and presented.

The applicant's evidence acknowledges that the proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, thereby permanently altering the character of the night-time seascape throughout the stated 35-year operational life. This change represents a significant visual impact, as the introduction of such lighting would be a novel and enduring feature in an area previously characterised by natural darkness.

It is important to note that, in policy terms, the 35-year operational life does not limit the potential harm to the seascape. The decision to consent to this development effectively constitutes a decision that this particular seascape is considered appropriate for wind farm use, with the attendant acceptance of changes to its character. This policy implication underscores the need for careful consideration of the balance between development benefits and the preservation of seascape qualities.

Given these factors, the impact of the lighting on the night-time seascape character requires thorough assessment within the planning process. While the operational timeframe may be finite, the policy consequences of consenting to such an alteration are enduring, necessitating a measured approach that weighs the permanent visual effects against the broader objectives of sustainable development.

The proposal fails to comply with key planning policies designed to safeguard landscape and seascape interests. Specifically, the effects of the development engage National Planning Framework 4 (NPF4) Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. The applicant has not demonstrated that its conclusions regarding the scale of these acknowledged effects align with its own established methodology. Furthermore,

there is no evidence to show that the proposal meets the requirements of the policies protecting nationally important landscapes and seascapes. On this basis, the proposal does not accord with the relevant policy framework and should be refused.

1.1.418 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of heritage impacts claims to follow Historic Environment Scotland's established methodology, which rightly distinguishes between mere visual change and actual adverse effects on the cultural significance of historic assets. This methodology requires a thorough evaluation of whether alterations to the setting compromise the contribution that setting makes to an asset's cultural value, including an explicit judgment on whether the integrity of that setting is preserved. By focusing on the nuanced relationship between setting and significance rather than simply on changes in visibility or landscape character, the methodology aims to ensure that assessments are both robust and meaningful in their conclusions.

However, a detailed Methodological Audit, which carefully scrutinises the applicant's Appendix 14.3, reveals a critical shortcoming in the operational assessment. While the applicant's report identifies relevant heritage attributes and describes various visual factors—such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—it fails to carry out the essential evaluative step required by its own cited methodology. Specifically, it does not demonstrate how the integrity of the setting has been assessed in line with the prescribed approach. The Audit finds no evidence within the examined examples that the applicant has moved beyond describing visual effects to properly assess their impact on the cultural significance or integrity of the setting. This omission fundamentally undermines the reliability of the applicant's conclusions regarding heritage impacts, calling into question the validity of the overall assessment.

The applicant's own baseline assessment acknowledges that the cultural significance of the affected heritage assets arises from a range of experiential qualities, including pilgrimage, arrival by sea, and movement through a living cultural landscape. This significance is rooted in the relationships between monuments, spirituality, and the surrounding landscape and seascape, which are primarily experienced through movement rather than from fixed viewpoints. Despite this recognition, Historic Environment Scotland's consultation responses, as recorded in the application, highlight the need for additional viewpoints to ensure these broader cultural and experiential qualities are adequately represented. This suggests that the applicant's assessment may not fully capture the extent of the heritage impacts when considering the wider cultural landscape and its dynamic qualities. It is therefore important that any evaluation of heritage effects gives proper weight to these aspects to avoid underestimating potential impacts on cultural significance.

The heritage impact conclusions rely substantially on the findings of the landscape assessment. However, as identified in the evidence, there is an understatement of landscape effects within that assessment. This understatement directly affects the heritage conclusions, causing them to inherit the same deficiencies. Consequently, the credibility of the heritage impact assessment is undermined by its dependence on a landscape analysis that does not fully capture the extent of landscape effects.

The application fails to provide the necessary assessment to demonstrate protection of internationally and nationally important heritage assets, as required by NPF4 Policy 7(h) on scheduled monuments and Policies 7(c) and 7(d) concerning their setting. This absence of evidence means the cultural significance of these assets and their surroundings cannot be assuredly preserved.

Furthermore, the proposal does not comply with the requirements set out in GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan, which collectively underscore the importance of safeguarding heritage within planning decisions. Without a robust demonstration of how these policies are met, there remains a substantial risk of harm to heritage assets.

In light of these shortcomings, the Scottish Ministers are deprived of the critical information necessary to conclude that the development would protect heritage assets appropriately. Consequently, the application should not be approved as it does not satisfy the essential policy safeguards for heritage protection.

1.1.419 Effects on Island Communities, Tourism and the Local Economy

There is significant uncertainty regarding the proposal's impact on the island communities, which rely disproportionately on visitors drawn by specific qualities identified in the applicant's own baseline assessments. These qualities—landscape, seascape, cultural heritage, tranquillity, and remoteness—constitute the very foundation of the local economy. Any alteration to these attributes would not only undermine the economic base but also jeopardise essential services, resident populations, and the long-term viability of these communities. Consequently, the proposal poses a fundamental threat to the sustainability of the island settlements.

While mitigation measures have been proposed to address potential socio-economic impacts on island communities, the applicant's assessment methodology remains fundamentally flawed and insufficient. Notably, the applicant's own consultants acknowledged habitability as a potentially significant pathway through which the proposal could affect island communities. However, no specific assessment of the habitability of the affected islands was undertaken. Instead, Chapter 18 of the socio-economic assessment focuses primarily on regional-level analysis, examining port communities in detail but neglecting an equivalent place-based assessment of the island communities directly facing the development. Despite this omission, the assessment concludes that these island communities exhibit low sensitivity to tourism-related effects, a conclusion reached without robust, localized analysis.

This approach fails to account for the unique economic characteristics of small island communities, which are not accurately represented by regional averages. Island economies tend to be highly concentrated in sectors directly dependent on the qualities that attract visitors, such as tourism and related services. Rather than diminishing sensitivity, this reliance on increasing visitor numbers intensifies dependence on those very qualities that may be at risk from the proposed development. Therefore, the conclusion of low sensitivity to tourism impacts, derived without any place-based analysis, cannot be considered evidence-based but instead represents an unsubstantiated assumption. Consequently, the socio-economic

assessment does not provide a reliable basis for understanding or mitigating potential impacts on island communities.

The proposal fails to comply with the relevant policy and statutory duties concerning island communities. Specifically, it does not satisfy the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions affecting such communities be founded on robust socio-economic evidence and adopt a precautionary approach when evidence is insufficient. Furthermore, it disregards the provisions of NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, all of which emphasise the necessity of assessing and affording appropriate weight to the interests of island communities through meaningful engagement from the earliest stages of development to its conclusion.

The applicant has acknowledged that island communities warrant particular scrutiny; however, it has failed to undertake the necessary assessments to properly understand the effects of the proposal on these communities. Without such assessments, there is no demonstration that the proposal is compatible with the sustainability of island communities. This omission is significant, as it undermines the ability to ensure that the development will not adversely affect the social and economic well-being of those communities.

In light of these considerations, it is evident that the statutory duties owed to island communities have not been discharged. The absence of adequate evidence and engagement means that the proposal cannot be considered compliant with the established policies and statutory requirements designed to protect island communities. Consequently, the proposal should not be supported.

1.1.420 Ecology, Biodiversity and Habitats Regulations

The proposed development would bring extensive construction, operational, and decommissioning activities into an ecologically sensitive marine environment over a period of several decades. This prolonged disturbance has the potential to cause significant adverse effects on the Priority Marine Features and Annex I habitats located within the development area itself. Given the scale and duration of the project, the cumulative impacts on the local ecosystem warrant careful consideration.

The surrounding waters of the site are known to support a range of protected species, including seabirds, marine mammals, and basking sharks. These species rely on the area for essential life processes such as feeding, breeding, and migration. Any disruption to their habitat, whether through noise, water pollution, or physical presence, could have detrimental consequences for their populations, which may already be vulnerable.

In light of the ecological importance and sensitivity of both the site and its adjacent waters, it is imperative that the potential environmental effects of the proposed development are thoroughly assessed and mitigated. Failure to do so risks significant harm to nationally and internationally protected marine features and species. Consequently, the proposal should be reconsidered in view of these environmental constraints.

Mitigation, compensation proposals, and future monitoring, while important considerations, do not in themselves satisfy the rigorous evidential requirements mandated by the Habitats Regulations. Consent for developments affecting protected habitats may only be lawfully granted when it is ascertained beyond reasonable scientific doubt that the integrity of the protected site will not be adversely affected. This high standard places the burden squarely on the applicant to demonstrate unequivocally that statutory tests are met, and mere reliance on mitigation measures cannot substitute for the necessary certainty demanded by law.

This stringent legal framework is reinforced through multiple policy instruments, including the Habitats Regulations, GEN 9 and GEN 13 of the National Marine Plan, and National Planning Framework 4 Policies 3, 4(b), 4(e), and 4(f). Together, they impose a strict control regime to ensure that any consent granted aligns with these protective requirements. Consequently, decision-makers must be satisfied that no reasonable scientific doubt remains before granting consent, thereby upholding the integrity of protected sites and adhering to established national policy standards.

The evidence submitted by the applicant, including their own derogation documents, reveals a significant shortfall in demonstrating compliance with the statutory tests designed to protect internationally important habitats and species. These documents themselves reflect a level of uncertainty that undermines confidence in the applicant's assertions. The statutory framework requires clear and convincing evidence that the requisite conditions for derogation are met, and the applicant's materials fail to provide such assurance. Without this, the legal safeguards intended to prevent harm to critical ecological features remain inadequately addressed.

This failure to satisfy the statutory tests has substantial implications for the assessment of the planning application. The protections afforded to internationally important ecological assets are not mere formalities but essential components of environmental stewardship and legal compliance. As the applicant has not demonstrated that these tests can be met, the basis for granting consent is fundamentally compromised. Consequently, the application should not be approved in its current form, as doing so would contravene the statutory protections and potentially cause irreparable harm to the designated habitats and species.

1.1.421 Cumulative and In-Combination Effects

The cumulative impact assessment fails to provide a reliable evaluation of the combined effects because it relies on flawed baseline assessments, resulting in an understated starting point. Specifically, the environmental impact assessment's underlying landscape, heritage, and socio-economic evaluations have already diminished the extent of identified effects. Consequently, the cumulative assessment inherits this reduced baseline, leading to an underestimation of the total impact when considering this proposal alongside other existing, consented, and foreseeable developments. This fundamental flaw undermines the credibility of the cumulative effects conclusions and calls into question the sufficiency of the mitigation measures proposed.

The applicant's submission fails to meet the requirements set out in GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the

Environmental Impact Assessment (EIA) Regulations regarding project splitting and the assessment of cumulative effects. Unlike a comprehensive assessment approach, which would integrate all elements of a project to fully appraise environmental impacts, the current proposal does not adequately consider the combined and in-combination effects of the development. This omission undermines the ability to evaluate the overall environmental consequences accurately and limits the effectiveness of any proposed mitigation measures.

Furthermore, the applicant has not explicitly addressed the implications of deferred works within the project scope, which is a critical factor in understanding the full extent of environmental impacts. The decision-making process requires clear and transparent consideration of these deferred elements to ensure compliance with relevant policies and regulations. Without this explicit treatment, there is a significant risk that the cumulative impacts remain underestimated, leading to an incomplete assessment that could result in adverse environmental consequences going unmitigated. It is therefore requested that the deferred works be expressly addressed and integrated within the determination to uphold policy compliance and environmental protection standards.

1.1.422 Public Engagement, Site Selection and Environmental Information

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

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

1.1.423 Effects on Local Area

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

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

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

The applicant's Coastal Character assessment recognises the Sound of Iona as an area of high sensitivity, noting its direct orientation towards the proposed development, extensive visibility, and a large geographical extent of change. The assessment identifies a Moderate and Significant overall effect across approximately 21 kilometres, with turbines spanning around 39 degrees of the horizon. The West Coast of Iona is similarly acknowledged as highly sensitive with widespread visibility, and the applicant accepts that significant effects will be experienced by residents and visitors throughout much of the island, including at Dùn Ì, the island's highest point.

Despite this recognition, the applicant's evaluation appears to understate the scale and significance of impacts on Iona's internationally important monastic heritage landscape, comprising the Abbey, the Nunnery, and the high crosses. These heritage assets are intrinsically linked to pilgrimage, arrival by sea, and movement through the landscape, factors emphasised in the applicant's own baseline studies. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet the applicant has not provided visualisations from critical vantage points such as the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn. This omission limits a full understanding of the visual effects on the heritage setting.

Community concerns further illustrate the potential underestimation of impacts. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal, highlighting strong local opposition. Notably, habitability—a pathway of potential effect identified by the applicant's consultants—was never assessed in relation to this community. To appreciate the scale of the turbines' visual dominance, the applicant's evidence compares them to the familiar landmark of Ben Hynish on Tiree, which at 141 metres is visible from Iona at approximately 33 kilometres; the proposed turbines would overtop Ben Hynish by about 194 metres at roughly two-thirds of that distance, emphasising their imposing presence. Taken together, these points suggest that the applicant's environmental and social impact evaluation does not fully capture the magnitude of effects on Iona.

The applicant's assessment fails to adequately address the substantial visual, economic, and community impacts that the proposed development would have on the coastal communities and designated landscapes of Mull and the Ross of Mull. Practically, this omission risks undermining the viability of key tourism-dependent areas and the experience of visitors who contribute significantly to the local economy. For example, the Ross of Mull South coastal area, located approximately 22 to 24 kilometres from the development site, is recognised as having High sensitivity and is attributed a Medium magnitude of effect. The applicant acknowledges significant impacts at Erraid and on the Core Paths of the Ross, and also concedes that Fionnphort—the gateway to Iona and principal embarkation point for visitors—is likely to experience significant effects. This community is directly reliant on the flow of visitors, and the identified impact would therefore have tangible consequences for its social and economic wellbeing.

Across Mull more broadly, significant effects are accepted on Core Paths and within the Central, South, and West Mull Local Landscape Areas. Notably, the Loch na Keal National Scenic Area, which encompasses Mull's western waters and islands and lies approximately 21 to 33 kilometres from the proposed site, is classified as being of High sensitivity. Yet, it is attributed no greater than a Medium magnitude of effect, a characterization that appears to understate the potential scale of impact on this nationally recognised landscape. Furthermore, the applicant's approach to the Wilderness and Gribun Rocks coastal area exemplifies a reliance on distance-based reasoning, stating that because the viewing distance exceeds 30 kilometres, the scale of change is "small." This assessment method risks overlooking the importance of certain viewpoints and the cumulative effects on landscape character and community perception.

Crucially, Mull's west-facing tourism economy—including wildlife boat operations and the accommodation sector in its western townships—depends heavily on the integrity of the Atlantic seascape. The proposed development would industrialise this seascape, yet no place-based assessment has been undertaken for these communities. This lack of focused evaluation means that the full scope of economic and social consequences remains insufficiently understood and inadequately mitigated within the applicant's documentation.

In conclusion, the applicant's assessment does not provide a comprehensive or appropriately weighted analysis of the significant visual, economic, and community effects on Mull and the Ross of Mull's coastal landscapes and settlements. This

deficiency undermines confidence in the conclusions drawn and fails to safeguard the interests of tourism-reliant communities and nationally designated landscapes that would be materially affected by the proposal.

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

Further concerns arise regarding other significant islands within the same National Scenic Area. Staffa, one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development site—beyond the 30 kilometre limit to which NatureScot recommended assessing effects on National Scenic Area qualities. The applicant concludes that any changes at Staffa would be small and not significant, a judgment that appears inconsistent with their own acceptance of the island's panoramic maritime qualities. Similarly, the Jura National Scenic Area, recognised for its wild and undeveloped Atlantic character, is assessed as having only Medium to Low magnitude effects despite its High sensitivity and proximity of 28 to 32 kilometres. This moderation is attributed to distance and retained landforms, yet it fails to adequately reflect the intrinsic value of Jura's outlook that underpins its designation.

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

The practical consequence of the applicant's assessment is a significant understatement of the visual and landscape effects on Tiree, which risks resulting in an unreliable evaluation of the project's true impact. The South Tiree coastal area, located approximately 35 kilometres from the proposed development, is identified as having High sensitivity; however, the assessment attributes only a Low magnitude of change to this receptor. This low magnitude classification does not adequately reflect the extent to which the development would alter the existing landscape character, particularly given Tiree's exceptional sensitivity.

Tiree's landscape is defined by its exceptionally low-lying nature, with the highest point, Ben Hynish, rising merely 141 metres above sea level. The island's distinctive character arises from the dominance of sea and sky and its open oceanic horizon. Introducing turbines up to 335 metres in height would place vertical structures into

the seascape that have no precedent on the island. This scale of change is fundamentally at odds with the assessment's Low magnitude conclusion and exemplifies the understatement of effects that this representation seeks to highlight. Consequently, the evaluation does not reliably capture the scale of impact on a receptor as sensitive and distinctive as Tiree.

The applicant's assessment fails to consider significant effects on mainland and island communities that have direct visual and economic connections to the seascape, undermining the comprehensiveness of the evaluation. For instance, Gigha, a community-owned island renowned nationally for its regeneration, faces the development waters directly from the east; yet, no examination has been made of the impacts on its delicate community balance and local economy. Similarly, Ardnamurchan Point—the westernmost tip of the British mainland—offers panoramic views along the Hebridean coast that attract visitors throughout the peninsula. These seaward panoramas, precisely the receptors affected by the distance-based mitigation measures challenged in this objection, have been overlooked. Furthermore, the west coast of Kintyre comprises a series of communities whose identity and visitor economy are shaped by the open Atlantic seaboard views towards Islay, Jura, and surrounding waters. The Treshnish Isles and other small islands with sightlines to the development area are equally disregarded. This collective omission calls into question the thoroughness of the applicant's assessment regarding the full range of receptors reliant on and influenced by this seascape.

The applicant's assessment methodology employs a distance-based approach which systematically moderates the magnitude of change and discounts the effects on sensitive receptors located beyond approximately 20 kilometres. As noted in the submitted evidence, wherever the assessment encounters a highly sensitive receptor beyond this threshold, the effect is diminished in significance, despite the presence of such receptors. This approach results in an absence of place-based evaluation for the communities affected at these greater distances, thereby overlooking localized impacts that may be considerable.

This systematic moderation undermines the integrity of the environmental impact assessment by failing to fully account for the potential effects on distant but sensitive receptors. The reliance on a rigid distance criterion to reduce the perceived magnitude of change does not reflect the nuanced realities experienced by affected communities, who have received no tailored or specific assessment of the impacts they face. Consequently, the assessment does not provide a comprehensive or accurate appraisal of environmental effects beyond 20 kilometres, calling into question the robustness of its conclusions and the adequacy of the mitigation measures proposed.

1.1.424 Personal Observations

In addition to the planning matters above, I am personally concerned because: It will spoil a heritage area i have visited many times and love

Based on my own local knowledge, I also wish to highlight that: Wildlife will be confused and killed by these turbines

1.1.425 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy requirements governing its determination. The applicant's own assessment acknowledges considerable impacts on nationally designated landscapes, as well as on the coastal communities and their heritage. Furthermore, published evaluations of the applicant's documentation reveal that the extent of these impacts has been underestimated and that a comprehensive heritage assessment has not been conducted. Although the effects on the island communities involved were identified, no formal assessment of these impacts has been undertaken. In addition, the ecological criteria necessary for approval have not been demonstrated as achievable. It is also pertinent to note that only a portion of the project is currently submitted to the Scottish Ministers for consideration.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to decline the related marine licence application.

Should the Ministers be inclined to grant consent, I request that they require the submission of further environmental information and enhanced visualisations. I also propose that the determination of the applications be deferred until after a public inquiry, thereby allowing a thorough examination of the issues raised in this objection. Regardless of the decision reached, I ask the Ministers to provide clear and explicit conclusions concerning the impacts on cultural heritage and on the affected island communities within their stated reasons.

Yours faithfully,

[Redacted]

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

Member of the public 545
Dear Sir/Madam,

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

The project under consideration seeks approval for an offshore wind farm with an installed capacity of approximately 2 gigawatts. The development entails the installation of between 91 and 144 turbines, each reaching a maximum blade tip height of up to 335 metres. The proposed site encompasses a Windfarm Development Area spanning around 448 square kilometres of marine environment situated to the north-west of Islay and west of Colonsay. This location lies approximately 21 kilometres from the island of Iona and is in close proximity to the islands and coastal communities of the southern Hebrides.

The grounds for objection are detailed below, structured in accordance with the pertinent statutory and policy framework that governs the determination of these applications. It is important to emphasise that the onus lies with the applicant to convincingly demonstrate, supported by robust evidence, that all relevant statutory and policy tests are satisfied. Objectors bear no obligation to prove contrary positions. Based on the deficiencies identified herein, it is evident that the applicant has failed to meet this evidential burden, and therefore, consent should be refused.

1.1.426 Seascape, Landscape and Visual Effects

The applicant’s written methodology, as set out in Appendix 16.1, notably lacks any specified distance threshold beyond which major effects cease. Nevertheless, an independently prepared Evidence Note, which draws entirely upon the applicant’s own Chapter 16 and Appendices 16.1 to 16.3, reveals a clear and consistent pattern across all three streams of assessment. This pattern demonstrates that no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of the receptor’s sensitivity or the extent of visibility. Furthermore, the applicant’s own documentation explicitly acknowledges the influence of distance on effect judgements. For example, the assessment of a coastal area situated over 30 kilometres from the site concludes that, given the viewing distance, the scale of change is considered small. Similarly, the Landscape Character synthesis categorises magnitude as High within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types.

This reliance on distance as a moderating factor in the assessment has significant implications for the reliability of the conclusions drawn. By systematically reducing the magnitude of effects at the very distances where the most sensitive designated landscapes are located, the inputs to the protective tests are effectively understated. As a result, the final assessments presented do not provide a dependable

description of the likely effects that the Scottish Ministers are being asked to consent to. Such an approach risks underrepresenting the true impact on sensitive receptors and consequently undermines the robustness of the decision-making process.

While mitigation measures are presented as part of the proposal to address visual impacts, it is important to recognise the inherent limitations of the visualisation materials used to support the assessment. NatureScot's visualisation guidance, which the applicant follows, explicitly states that printed visualisations cannot fully replicate the scale perceived by a viewer in the actual field setting. Furthermore, wireline drawings included within the same panoramic projections are constrained by the same photographic limitations; they serve as technical renderings embedded within the visualisation rather than functioning as independent or corrective representations. Consequently, reliance on these materials may underestimate or misrepresent the true visual effects experienced on site, and this constraint should be carefully considered in the evaluation of the proposed development's impact.

The practical consequence of the proposed development is the introduction of aviation and navigation lighting to a currently unlit sea horizon, resulting in a permanent alteration to the night-time seascape character for the duration of its stated 35-year operational life. This change would be perceptible and sustained, fundamentally affecting the visual experience and natural qualities of the seascape during nighttime conditions.

Beyond this timeframe, the policy implications must be carefully considered. Consenting to the development effectively signals that this seascape is appropriate for wind farm use, establishing a precedent that may influence future decisions. Thus, the impact on night-time seascape character is not merely a temporary effect but bears significant weight in the planning balance and the long-term management of seascape values.

The applicant's assessment of the proposed development's effects on landscape and seascape interests fails to align consistently with its stated methodology, undermining the credibility of its conclusions regarding the scale of these impacts. While certain effects are acknowledged, the mitigation measures proposed do not sufficiently address the requirements set out in the relevant policies. This shortfall is particularly significant given the protections afforded to nationally important landscapes and seascapes, where robust and demonstrable mitigation is essential to meet policy objectives.

These deficiencies result in clear non-compliance with National Planning Framework 4 (NPF4) policies 4(c) and 4(d), 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan, all of which safeguard key landscape and seascape interests. The absence of a thorough demonstration that the proposal meets these policy requirements calls into question its suitability and merits refusal on the grounds of insufficient mitigation and policy non-conformity.

1.1.427 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of the effects on the setting of historic assets does not comply with the established methodology required for such evaluations, thereby

undermining the reliability of its conclusions regarding heritage impacts. While the applicant adopts Historic Environment Scotland's recognised methodology, which mandates an evaluation of how changes to setting affect the contribution that setting makes to cultural significance and requires an assessment of whether the integrity of that setting is adequately retained, the methodology explicitly states that visual change should not be equated directly with adverse impact.

An independent Methodological Audit, based solely on the applicant's Appendix 14.3, reveals that although the operational assessment identifies relevant heritage attributes and describes visual change factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it fails to demonstrate the critical evaluative step of assessing the integrity of the setting as prescribed by the methodology. The Audit highlights that this essential analytical process is absent in all the examined worked examples, calling into question the validity of the applicant's conclusion that the integrity of setting is adequately retained.

The applicant's assessment risks underrepresenting the heritage impacts by not fully capturing the broader cultural landscape and experiential qualities that define the significance of the affected assets. Their own baseline acknowledges that this significance arises from dynamic elements such as pilgrimage, arrival by sea, movement through a living cultural landscape, and the interrelationships between monuments, spirituality, and the surrounding landscape and seascape, all experienced through movement rather than fixed viewpoints. Furthermore, Historic Environment Scotland's consultation responses, as recorded within the application, explicitly requested additional viewpoints to ensure these wider qualities are adequately represented. Without addressing these concerns, the assessment may fail to reflect the full extent of the heritage impacts.

The mitigation measures proposed rely heavily on the findings of the landscape assessment. However, as the landscape effects have been understated, as previously detailed, the heritage impact conclusions that depend on this assessment are similarly compromised. This interdependence means that any deficiency in the landscape evaluation directly undermines the credibility of the heritage conclusions derived from it. Consequently, the overall assessment of heritage impacts cannot be fully relied upon without addressing these fundamental shortcomings in the landscape analysis.

The application engages directly with several key statutory policies, notably National Planning Framework 4 (NPF4) Policy 7(h) concerning scheduled monuments, alongside Policies 7(c) and 7(d) addressing the settings of heritage assets. Additionally, it must be considered in the context of GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan, which collectively set out the framework for safeguarding cultural heritage within marine and terrestrial planning domains. These provisions underscore the imperative to rigorously assess and ensure the protection of internationally and nationally important heritage assets and their settings, reflecting a high level of statutory protection and policy priority.

However, the applicant has not furnished evidence demonstrating that the cultural significance of these heritage assets and their settings will be adequately protected.

Critically, the Scottish Ministers have not been presented with the requisite assessment that such a conclusion would necessitate. In the absence of a robust and comprehensive evaluation of potential impacts on the cultural heritage, the application fails to satisfy the stringent policy requirements referenced. This deficiency undermines the acceptability of the proposal, as it does not provide the necessary assurance that heritage assets of recognised national and international importance will be preserved in accordance with the statutory and policy framework.

1.1.428 Effects on Island Communities, Tourism and the Local Economy

The proposal threatens the fundamental economic and social sustainability of the island communities by undermining the very qualities that attract their essential visitor base. These communities rely exceptionally heavily on visitors who are drawn to the landscape, seascape, cultural heritage, tranquillity and remoteness—all attributes explicitly identified in the applicant's own baseline assessments. Any alteration to these qualities directly jeopardises the economic foundation of these islands. This, in turn, would have cascading effects on local services, population retention and the overall viability of the communities. Consequently, the proposal poses a significant risk to the long-term sustainability of these island settlements.

The applicant's own consultants acknowledged that habitability constitutes a potentially significant pathway through which the proposal could impact island communities. Despite this, no assessment was undertaken to evaluate the habitability of the affected islands. Instead, the socio-economic assessment presented in Chapter 18 focuses primarily on regional-level analysis, detailing potential impacts on port communities while omitting an equivalent, place-based examination of the island communities directly facing the development. This approach leads to the conclusion that these island communities exhibit low sensitivity to tourism effects, a finding reached without the benefit of targeted, location-specific analysis.

Such a conclusion fails to recognise the distinctive nature of small island economies, which are not adequately represented by regional averages. These economies are typically concentrated in sectors that are highly vulnerable to changes in the environmental and social qualities that attract visitors. Far from mitigating sensitivity, reliance on increasing visitor numbers intensifies dependence on these at-risk qualities. Therefore, the assertion of low sensitivity to tourism impacts, unsupported by detailed place-based assessment, amounts to an unsubstantiated assumption rather than evidence. This fundamental flaw undermines the robustness of the socio-economic assessment and calls into question the adequacy of the methodology to understand or mitigate the proposal's effects on island communities.

1.1.429 Ecology, Biodiversity and Habitats Regulations

The proposed development presents a significant risk of adverse environmental effects due to its location within an ecologically sensitive area. Priority Marine Features and Annex I habitats are present within the development site itself, indicating a high level of ecological importance. Furthermore, the surrounding waters provide habitat for protected species, including seabirds, marine mammals, and basking sharks. The scale and duration of the proposed construction, operational,

and decommissioning activities—extending over several decades—would exert considerable pressure on these vulnerable ecosystems. Given the presence of such valuable marine biodiversity and the potential for substantial disturbance, the development is likely to result in significant environmental harm. It is therefore imperative that this ecological sensitivity is fully recognised and appropriately addressed in any planning decisions.

The practical consequence of the applicant's submission of a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan is that it implicitly acknowledges the possibility of adverse impacts on the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are specifically prepared for circumstances in which an adverse effect on the integrity of a protected site cannot be definitively ruled out. Their inclusion within the application therefore signals the applicant's recognition that mitigation measures alone may not suffice to prevent harm, necessitating recourse to derogation provisions.

Moreover, the submission of such documents constitutes a significant feature of the application process, as it indicates that the Scottish Ministers may reach a different conclusion from the applicant regarding the presence or absence of adverse effects on the protected site. This suggests a level of uncertainty or dispute about the environmental impacts, reinforcing the importance of careful scrutiny of the proposed compensation measures. While the applicant has taken steps to address potential effects, the reliance on derogation documentation highlights the need for thorough assessment to ensure that the integrity of the Special Protection Area is not compromised.

Consent for developments affecting protected habitats and species can only be granted if it is firmly established that the proposal will not adversely affect the integrity of the designated site. This requirement demands that no reasonable scientific doubt remains regarding the absence of harm, placing a heavy evidential burden on the applicant. Importantly, the presence of mitigation measures, compensation proposals, or plans for future monitoring alone does not satisfy this legal standard, as these cannot in themselves confirm compliance with the statutory tests.

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

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

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

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

1.1.430 Cumulative and In-Combination Effects

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

The Environmental Impact Assessment's cumulative impact assessment relies fundamentally on the findings established in preceding sections covering landscape, heritage, and socio-economic factors. However, as demonstrated, these underlying assessments have systematically understated the magnitude of effects. Consequently, the baseline from which cumulative impacts are evaluated is inherently reduced. This foundational underestimation compromises the reliability of the cumulative assessment, as the initial data fails to fully capture the extent of existing conditions and sensitivities.

Building upon a diminished baseline inevitably results in an undervaluation of the combined effects of the proposed development alongside other existing, consented, and foreseeable projects. The cumulative impact assessment, therefore, presents a misleadingly moderate appraisal of overall impacts. This flawed approach risks obscuring the true scale and severity of potential cumulative harm, undermining the robustness of the Environmental Impact Assessment and the soundness of decision-making predicated upon it.

There remains significant uncertainty regarding the applicant's compliance with key policy and regulatory requirements relating to project splitting and the assessment of cumulative effects. In particular, the proposal fails to demonstrate that the cumulative and in-combination impacts have been thoroughly identified and evaluated, as required by GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e),

and the Environmental Impact Assessment Regulations. Crucially, the treatment of deferred works has not been explicitly addressed within the application, leaving a gap in the understanding of the full scope and consequences of the project. It is therefore essential that the decision-making process explicitly considers these outstanding matters to ensure that all environmental effects are comprehensively assessed and that the proposal aligns with the statutory and policy framework before any determination is made.

1.1.431 Public Engagement, Site Selection and Environmental Information

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

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

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

The Environmental Impact Assessment (EIA) submitted with the application serves as the principal evidential basis for determination; however, it falls short of sufficiency despite its extent. The application identifies potential pathways to significant effects across multiple topics but fails to investigate them comprehensively or relies on methodologies that undermine the robustness of its conclusions. For example, the landscape assessment derives outcomes based on a distance pattern that its own methodology does not support; the heritage assessment lacks demonstration of the application of its stated integrity test; and the socio-economic assessment omits any place-based analysis of the affected islands. Furthermore, the application depends in certain areas on future assessments, post-consent plans, ongoing monitoring, and additional approvals. Such reliance does not satisfy the requirements of the EIA Regulations, which mandate that likely significant effects be fully understood prior to determination. Consequently, the Scottish Ministers are compelled to decide based solely on the evidence before them, without presuming that unresolved matters will be adequately addressed subsequently. The

applicant has therefore not demonstrated that the environmental information provided is sufficient to enable an informed decision.

1.1.432 Effects on Local Area

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

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

The applicant's own Coastal Character assessment recognises the Sound of Iona as an area of high sensitivity, directly facing the development site with extensive visibility. It identifies a large geographical extent of change, approximately 21 kilometres in range, where turbines span about 39 degrees of the horizon, resulting in a Moderate and Significant overall effect. Similarly, the West Coast of Iona is acknowledged as highly sensitive, with widespread visibility of the proposed development. The applicant accepts that residents and visitors across much of the island, including at its highest point, Dùn Ì, will experience significant visual effects. These findings underscore the substantial scale of visual impact on Iona, yet they appear to understate the full extent of the experience for the island's community and visitors.

Beyond visual considerations, the heritage implications are profound. Iona's monastic landscape, encompassing the Abbey, the Nunnery and the high crosses, is of international importance, with significance closely tied to pilgrimage, arrival by sea and movement through the landscape, as noted in the applicant's baseline studies. Historic Environment Scotland requested additional visual viewpoints, including from the ferry crossing, a key arrival experience, yet the applicant has not provided a visualisation from critical elevated locations such as the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn. Furthermore, community consultation reveals strong opposition, with 92 per cent of respondents objecting to the proposal. Despite the applicant's consultants identifying habitability as a potential pathway of effect for the island community, no assessment of this impact has been undertaken. The perceived scale of the turbines is further illustrated by comparison with Ben Hynish on Tiree, a familiar landmark visible from Iona at 33 kilometres and 141 metres high;

the largest turbines would exceed this height by approximately 194 metres while being located at roughly two-thirds of that distance. Taken together, these factors indicate that the applicant's assessment significantly underestimates the scale and significance of the visual, community and heritage effects on Iona, thereby compromising the accuracy of the environmental and social impact evaluation.

The applicant's assessment of the visual and community impacts on Mull and Ross of Mull coastal areas relies heavily on distance-based mitigation assumptions, which inadequately reflect the true magnitude of change experienced by these sensitive locations. For example, while the Loch na Keal National Scenic Area is acknowledged as having High sensitivity at viewing distances between 21 and 33 kilometres, the applicant attributes no greater than Medium magnitude to the effects, thereby understating the significance of impact. Similarly, the Ross of Mull South coastal area, assessed as of High sensitivity at approximately 22 to 24 kilometres, is attributed only Medium magnitude despite acknowledged significant effects at Erraid, on Core Paths of the Ross, and notably at Fionnphort. This latter community is particularly critical as it serves as the gateway to Iona and the primary embarkation point for visitors, yet the assessment fails to adequately account for the disruption to its flow of tourism and community life. The treatment of more distant areas, such as the Wilderness and Gribun Rocks coastal area beyond 30 kilometres, further exemplifies this reliance on distance to downplay the scale of visual change, with the applicant concluding a small scale of change solely on that basis.

Beyond the shortcomings of the visual assessment, the applicant's approach neglects the essential economic and community dimensions tied to these landscapes. Mull's west-facing tourism economy, including its wildlife boat operators and the accommodation sectors within its western townships, is fundamentally dependent upon the Atlantic seascape, which the proposed development would industrialise. Despite this, none of these communities has been subject to a place-based assessment that might elucidate the full extent of economic and social impacts. The failure to recognise the interdependence of landscape, community identity, and visitor experience results in an incomplete and potentially misleading evaluation of effects. Given the prominence of tourism in sustaining these communities, and the designation of key landscapes as nationally and locally important, the applicant's assessment falls short of capturing the significant visual, economic, and community impacts that the development would engender.

While the applicant's assessment acknowledges some potential effects on designated landscapes and island communities, it notably underestimates or omits significant impacts that warrant closer scrutiny. For instance, Ulva, situated within the Loch na Keal National Scenic Area, is a community-owned island currently undergoing regeneration. The recovery of this small, re-establishing community relies heavily on the intact qualities of its setting and unspoilt seascape—precisely those elements potentially compromised by the development. Yet, no assessment has been undertaken to evaluate these effects on Ulva's natural and cultural environment. Similarly, Staffa, also within the Loch na Keal National Scenic Area and renowned as one of Europe's most celebrated small islands, lies around 35 kilometres from the proposed development site. This distance exceeds the approximately 30 kilometres threshold NatureScot recommended for assessing effects on National Scenic Area qualities. Despite this, the applicant concludes that

the scale of change at Staffa would be small and not significant, notwithstanding the panoramic maritime qualities that their own assessment recognises. The Jura National Scenic Area, assessed as having high sensitivity at a distance of approximately 28 to 32 kilometres, is attributed only a medium to low magnitude of effect, justified by factors such as distance, apparent scale, and retained landforms. However, this conclusion appears to underplay the importance of the designation's foundation on the wild, undeveloped character of its Atlantic outlook. A similar approach is applied to the Scarba, Lunga and Garvellachs National Scenic Area, situated about 35 to 40 kilometres from the development, where comparable assumptions are made. Taken together, these considerations suggest that the applicant's assessment may not fully capture the extent of effects on these valued landscapes and island communities. Consequently, the protection of their natural and cultural qualities remains inadequately assured.

The applicant's assessment significantly understates the magnitude of change and impact on the sensitive and distinctive landscape character of Tiree, resulting in an unreliable evaluation of effects. Specifically, the South Tiree coastal area, located approximately 35 kilometres from the development, has been attributed a Low magnitude of change despite being assessed as having High sensitivity. This is a critical inconsistency because Tiree is an exceptionally low-lying island whose entire landscape character is defined by the dominance of sea and sky. The island's highest point, Ben Hynish, rises only 141 metres, which underscores the scale of vertical elements introduced by turbines reaching up to 335 metres in height. Such turbines would represent unprecedented vertical structures in Tiree's open oceanic horizon and seascape, fundamentally altering the island's distinctive character. Given this context, the conclusion that the magnitude of change is Low exemplifies a severe understatement of effects. Therefore, the applicant's evaluation cannot be regarded as reliable, and a reassessment that properly acknowledges the pronounced landscape impact on Tiree is necessary.

The applicant's assessment has overlooked significant effects on mainland and island communities that have direct visual and economic connections to the seascape in question. Notably, Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by residents, faces the development area from the east. Despite the island's finely balanced community and economy, the assessment fails to examine the impacts on Gigha, thereby omitting consideration of a key receptor intimately linked to the seascape.

Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the sensitive receptors to which the applicant's distance-based mitigation approach is applied, raising concerns about the validity of this method. Additionally, the chain of communities along the west coast of Kintyre, whose character and visitor economy depend on open Atlantic seaboard views towards Islay, Jura, and surrounding waters, along with the Treshnish Isles and other small islands and mainland coasts overlooking the development site, have also been excluded from assessment. This omission undermines the comprehensiveness of the applicant's evaluation and leaves unaddressed potential adverse effects on these interconnected communities.

The applicant’s environmental impact assessment employs a distance-based mitigation approach that systematically moderates and discounts effects on sensitive receptors located beyond approximately 20 kilometres. This methodology effectively diminishes the perceived magnitude of change experienced by these communities, contrasting with the more detailed and place-specific assessments conducted within the 20-kilometre zone. By applying a generalized attenuation beyond this boundary, the assessment fails to acknowledge the true extent of potential impacts.

This approach results in a significant gap in the evaluation, as highly sensitive receptors beyond 20 kilometres receive no place-based assessment whatsoever. The consequence is that the lived experiences and environmental conditions of these distant communities are overlooked, undermining the integrity of the overall impact assessment. Such systematic underestimation raises concerns about the adequacy and completeness of the applicant’s methodology in capturing the full scope of environmental effects.

1.1.433 Personal Observations

Finally, I would also ask the Scottish Ministers to consider: I believe that the proposal has not taken sufficient account of the negative impacts on the area which is of high cultural importance to our nation.

1.1.434 Summary

The proposal before the Scottish Ministers fails to demonstrate compliance with the governing statutory and policy framework. The applicant’s own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the coastal communities and heritage of the area. However, published analyses of the applicant’s documentation reveal that these impacts have been understated. Crucially, the necessary heritage assessment has not been undertaken, and although the effects on the island communities affected were identified, they were never properly assessed. Furthermore, the ecological requirements have not been satisfactorily evidenced as capable of being met. It is also pertinent to note that the application submitted represents only a portion of the overall project.

In light of these deficiencies, it is respectfully urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm proposal, along with the associated marine licence. Should the Ministers consider granting approval, it is requested that the applicant be required to provide further environmental information and enhanced visualisations. Additionally, the determination of these applications should be deferred pending a public inquiry, thereby allowing a thorough examination of the issues raised in this objection. Regardless of the outcome, it is further requested that the Ministers explicitly address and conclude on the impacts to cultural heritage and the affected island communities within their formal reasons for decision.

Yours faithfully,

[Redacted]

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

Member of the public 546
Dear Sir/Madam,

I hereby submit a formal objection to the proposals for the MachairWind Offshore Wind Farm, relating to application numbers 00012385 and 00012386. These applications seek consent under section 36 of the Electricity Act 1989 and a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010, respectively, and have been put forward by MachairWind Limited, trading as ScottishPower Renewables. I request that this letter be recorded as an official objection, that my status as an objector be acknowledged, and that I receive notification of the final decision regarding these applications.

The project in question entails the development of an offshore wind farm with a generating capacity of approximately 2 gigawatts. This would consist of between 91 and 144 turbines, each with a maximum height of up to 335 metres to blade tip. The proposed site spans a Windfarm Development Area of roughly 448 square kilometres, located in the sea to the north-west of Islay and west of Colonsay. This area lies approximately 21 kilometres from the island of Iona and is in close proximity to various islands and coastal communities within the southern Hebrides.

My objection is grounded in both planning and environmental considerations, assessed within the statutory and policy frameworks applicable to the determination of these applications. It is important to emphasise that the responsibility lies with the applicant to provide sufficient and robust evidence demonstrating that all relevant statutory tests and policy requirements are met. The onus is not upon objectors to prove the contrary. In this case, as detailed in the following sections, the applicant has failed to meet this evidential burden. Consequently, I conclude that the applications should be refused consent.

1.1.435 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989. This Schedule explicitly requires the applicant to have regard to the desirability of preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant must take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The Scottish Ministers, in determining the application, are similarly required to have regard to these statutory duties.

The evidence before the determining authority does not establish that these requirements have been adequately addressed. There are clear deficiencies and omissions in the application’s consideration of these statutory duties, and no satisfactory demonstration that reasonable mitigation measures have been proposed or will be implemented. Given these unresolved uncertainties and failures, the application conflicts with the applicable legal and policy framework. Consequently, these matters weigh decisively against the granting of consent.

The marine licence application under consideration fails to demonstrate compliance with the statutory requirements set out in Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland's National Marine Plan. As authorisation decisions must be taken in accordance with the National Marine Plan unless relevant considerations indicate otherwise, the application must fully satisfy the General Policies applicable to this proposal. These include GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts). The application as submitted does not provide adequate evidence to confirm adherence to these policies, thereby failing to meet the statutory assessment requirements.

Moreover, the evidence identifies clear deficiencies and omissions within the application that conflict with the applicable legal and policy framework. The absence of demonstrated compliance with these critical policies undermines the statutory basis for granting consent. In accordance with the established legal position, where compliance has not been demonstrated or where the evidence reveals shortcomings, these factors must weigh against the approval of the marine licence. Consequently, the application should be refused on the grounds that it does not satisfy the mandatory statutory and policy criteria established by the Marine (Scotland) Act 2010 and the National Marine Plan.

The proposal fails to comply with key policies of National Planning Framework 4 (NPF4), which is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. Specifically, the application does not demonstrate compliance with Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy). This failure to meet the requirements of NPF4 policies is a critical deficiency that weighs against the granting of consent.

Policy 3 (Biodiversity) requires that developments protect and enhance biodiversity, yet the evidence submitted does not adequately demonstrate how the proposal will achieve this. Similarly, under Policy 4 (Natural Places), the proposal must safeguard natural environments and landscapes, but the application lacks sufficient detail or measures to ensure these natural places are preserved or enhanced. Policy 7 (Historic Assets and Places) mandates the protection of historic assets, yet the proposal does not provide convincing evidence that it will avoid harm to such assets or their settings. Finally, Policy 11 (Energy) sets out requirements for energy considerations within developments, which the proposal fails to address satisfactorily.

Where compliance with these policies has not been demonstrated, or where the evidence identifies deficiencies, omissions, or conflicts with the applicable legal and policy framework, these matters must be given significant weight against the proposal. The absence of demonstrated compliance with these fundamental NPF4 policies constitutes a clear failure to meet the statutory and policy requirements governing this development. Consequently, the proposal should not be granted planning consent.

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations mandate that the likely significant environmental effects of the proposal must be identified, assessed, and reported prior to any determination. Additionally, the Habitats Regulations require that the effects of the proposal on European protected sites be assessed in accordance with the applicable statutory tests. These legal requirements establish a clear procedural and evidential framework to ensure that environmental impacts are fully understood and addressed before consent is granted.

In this case, compliance with these statutory requirements has not been demonstrated. The evidence identifies deficiencies and omissions in the environmental impact assessment and habitats regulations assessment submitted with the proposal. Such failures constitute conflicts with the applicable legal and policy framework. As a result, these shortcomings weigh decisively against the granting of consent for the development. Without adequate assessment and demonstration of compliance, the proposal cannot lawfully proceed.

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

Furthermore, where compliance with the Islands (Scotland) Act 2018 has not been demonstrated, or where the evidence identifies deficiencies, omissions, or conflicts with the applicable legal and policy framework, these matters must weigh against the granting of consent. In this case, the failure to properly consider and weigh the interests of island communities constitutes a significant procedural and substantive omission. Consequently, the proposal is in conflict with the statutory requirements and should be refused on this basis.

The applicant has failed to provide the robust, objective, and proportionate evidence necessary to demonstrate compliance with all relevant statutory duties, planning policies, and environmental assessment requirements. This failure is critical because the responsibility to prove such compliance rests squarely with the applicant.

The evidence clearly establishes that where compliance is not demonstrated, or where deficiencies, omissions, or conflicts with the applicable legal and policy framework are identified, these shortcomings must weigh against the granting of consent. In this case, the applicant has not met this evidential burden. There is an absence of comprehensive proof that all legal and policy obligations have been satisfied, and no adequate justification has been presented to address these gaps.

Accordingly, the application does not fulfill the fundamental requirement to demonstrate adherence to the full spectrum of statutory and policy frameworks governing the proposal. This failure alone constitutes a substantive reason to refuse

consent, as the applicant has not discharged the essential duty to provide conclusive evidence of compliance.

1.1.436 Conflict with National Planning Framework 4 and the Development Plan

There is considerable uncertainty regarding the proposal's compliance with the impact criteria set out in NPF4 Policy 11, which is pivotal to the policy's overall support for renewable energy development. While Policy 11 endorses such development, this support is conditional upon adherence to specific impact tests, notably those relating to effects on communities, landscapes, seascapes, and other sensitive receptors as outlined in clauses 11(c), 11(d), and 11(e).

The proposal appears to conflict with these essential criteria. It would result in significant adverse effects on nationally designated landscapes and seascapes, which are afforded high levels of protection under the policy. Furthermore, the evidence submitted fails to demonstrate that the cultural significance of scheduled monuments and their settings would be adequately safeguarded, nor that the interests of island communities would be properly protected. These shortcomings raise serious doubts about the proposal's acceptability under the policy framework.

Moreover, the ecological assessments provided do not convincingly establish that the necessary environmental tests can be met. In light of these unresolved concerns, the proposal does not satisfy the impact criteria integral to NPF4 Policy 11, thereby undermining the policy's intended balance between enabling renewable energy and protecting key environmental and cultural assets.

The proposal fails to comply with multiple National Planning Framework 4 policies designed to protect nationally important landscapes, heritage assets, and biodiversity, resulting in significant adverse consequences. Specifically, it conflicts with Policy 11, which operates alongside Policy 4(c) and 4(d) protecting National Scenic Areas and nationally important landscapes from substantial harm to the qualities for which they are designated. Furthermore, it does not satisfy Policy 7, including 7(h) concerning scheduled monuments and Policies 7(c) and 7(d) on the setting of historic assets. Additionally, the proposal falls short of Policy 3's requirements on biodiversity protection. The evidence demonstrates that the development would cause significant adverse effects on nationally designated landscapes and seascapes. It has not been adequately shown that the cultural significance of scheduled monuments and their settings would be preserved, nor that island communities would be safeguarded. Crucially, the ecological assessments and tests required by these policies have not been proven to be met based on the submitted evidence. Consequently, the proposal is incompatible with these key NPF4 policies safeguarding designated assets.

The proposal is found to be in conflict with the terrestrial development plan framework, including the Argyll and Bute Local Development Plan 2. Specifically, it would adversely affect the landscape, heritage, and community interests that these policies are designed to protect. This adverse impact demonstrates inconsistency with the development plan as a whole. Furthermore, when considered alongside National Planning Framework 4, the proposal remains at odds with the overarching policy framework, and the applicant has not provided sufficient evidence to dispel

this conclusion. Therefore, the proposal fails to accord with the relevant land-based policies and should be refused accordingly.

1.1.437 Seascape, Landscape and Visual Effects

The applicant's assessment methodology, as set out in Appendix 16.1, notably lacks a defined distance threshold beyond which major effects are considered to cease. Nevertheless, an independent Evidence Note, analysing the applicant's Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern across all three assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of its inherent sensitivity or the extent of visibility. This pattern is further corroborated by the applicant's own documentation, which acknowledges the influence of distance on judgements—highlighting, for example, that a coastal area over 30 kilometres away is assessed as experiencing only a small scale of change. The Landscape Character synthesis similarly identifies a High magnitude of effect within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types.

Such a methodological approach results in the protective tests being applied to understated inputs. By systematically moderating magnitude at precisely those distances where the most sensitive designated landscapes are situated, the assessment's conclusions fail to provide a reliable description of the effects the Scottish Ministers are asked to consider. Consequently, there is a significant concern that the current methodology does not accurately capture the true extent of potential impacts on sensitive receptors, undermining the robustness of the decision-making process.

The applicant's evidence draws on NatureScot's visualisation guidance, which acknowledges inherent limitations in the visual materials used to support the assessment. Specifically, the guidance recognises that printed visualisations cannot fully replicate the scale as perceived by a viewer on site. Furthermore, wireline drawings, which are presented within the same panoramic projections as the photographs, share the same constraints. These wireline drawings serve as a technical rendering within the visualisation rather than an independent corrective to photographic limitations. Consequently, while these visual materials provide a useful illustrative tool, they are inherently constrained and should be interpreted with an understanding of their technical and perceptual limitations.

When assessing the impact of the proposed development on the night-time seascape character, it is important first to consider the nature and extent of any mitigation measures against the permanent introduction of artificial lighting. The proposal would necessitate aviation and navigation lighting on a sea horizon that is currently free from such illumination. This change would result in a permanent alteration to the character of the night-time seascape for the planned 35-year operational life of the development. While mitigation might seek to minimise light spill or glare, the fundamental presence of lighting in an unlit seascape represents a significant and inescapable transformation.

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

When assessing the proposal against relevant planning policies safeguarding landscape and seascape interests, it is important to consider the extent to which mitigation measures have been applied and their effectiveness. The applicant's submission fails to demonstrate that the scale of the acknowledged effects has been properly evaluated in accordance with its own methodology. Without clear evidence of effective mitigation, the proposal remains inconsistent with the requirements set out in NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively seek to ensure that development minimises adverse impacts on nationally important landscapes and seascapes, and any deficiencies in mitigation undermine the justification for the project.

Furthermore, the applicant has not provided sufficient evidence to prove compliance with the policies designed to protect these valued environments. The absence of robust assessment and appropriate mitigation strategies means the proposal does not meet the established policy tests. Consequently, the application falls short of the standards required to safeguard the special qualities of the landscape and seascape, and as such, should not be supported in its current form.

1.1.438 Cultural Landscape, Archaeology and Historic Environment

The practical consequence of the applicant's assessment approach is a significant uncertainty regarding the true impact of the proposals on the setting of historic assets. Although the applicant states that they have applied Historic Environment Scotland's recognised methodology, the essential evaluative process required to determine whether the integrity of setting is maintained has not been demonstrated. Without this key step, the conclusions drawn about heritage impacts lack the necessary evidential foundation and cannot be relied upon with confidence.

Historic Environment Scotland's methodology, developed through extensive consultation, explicitly requires an assessment that goes beyond mere description of visual changes. It mandates a focused evaluation of how any changes affect the contribution that setting makes to the cultural significance of the heritage assets, with particular attention to whether the integrity of that setting is adequately retained. The methodology also clarifies that visual change alone should not be equated directly with adverse impact, emphasising the need for a nuanced and reasoned judgement.

However, a detailed Methodological Audit, which reviewed the applicant's own Appendix 14.3, found that the assessment primarily describes factors such as visibility, distance, and screening, before making an unsubstantiated conclusion that

the integrity of setting remains intact. This audit highlights that the crucial evaluative step prescribed by the methodology is absent from the applicant's assessment and its worked examples. Consequently, the reliability of the assessment's conclusions is fundamentally undermined, and the heritage impacts remain insufficiently justified.

The practical consequence of the applicant's approach is that the assessment may underrepresent key aspects of the cultural significance of the heritage assets in question. The applicant's own baseline acknowledges that this significance arises not merely from static features but from dynamic qualities such as pilgrimage routes, arrival by sea, movement through an active cultural landscape, and the interrelationships among monuments, spirituality, and the encompassing landscape and seascape. These elements are experienced through movement rather than from fixed viewpoints, indicating a broader and more immersive cultural context that should be central to any impact evaluation.

Furthermore, Historic Environment Scotland's consultation responses, as recorded within the application, highlight this deficiency by requesting additional viewpoints to ensure these wider experiential qualities are properly represented. This suggests that the current assessment falls short of capturing the full scope of the heritage assets' cultural landscape. Without addressing these concerns, the appraisal risks providing an incomplete understanding of the heritage impacts, potentially leading to mitigation measures that do not fully respect or preserve the assets' cultural significance. It is therefore necessary to incorporate these broader landscape and experiential factors into the assessment to achieve a more comprehensive and accurate evaluation.

The practical consequence of the deficiencies identified in the landscape assessment is that the heritage impact conclusions drawn from it are fundamentally undermined. The heritage conclusions rely directly upon the findings of the landscape assessment; therefore, any understatement of landscape effects inevitably leads to a corresponding understatement of heritage effects. This interdependence means that where the landscape assessment fails to fully capture or accurately represent the extent of landscape impacts, the subsequent heritage conclusions are rendered less credible. In light of this, the heritage impact conclusions cannot be accepted at face value without addressing and rectifying the shortcomings in the landscape assessment.

There remains significant uncertainty regarding the application's compliance with key heritage protection policies. Specifically, it engages NPF4 Policy 7(h) concerning scheduled monuments, alongside Policies 7(c) and 7(d) which address the settings of such assets, as well as GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. These provisions collectively establish a clear framework for safeguarding the cultural significance of heritage assets and their surroundings.

Despite this policy context, the applicant has failed to demonstrate that the cultural significance of internationally and nationally important heritage assets and their settings will be protected. Moreover, the Scottish Ministers have not been provided with the requisite assessment to support such a conclusion. In light of this absence of essential evidence, the application cannot be considered acceptable in terms of heritage protection.

1.1.439 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development exhibit an exceptional dependence on visitors, who are principally drawn by the landscape, seascape, cultural heritage, tranquillity, and remoteness identified in the applicant's own baseline assessments. This reliance underscores the critical importance of these qualities as the foundation of the local economy.

Any alteration to these defining attributes would directly undermine the economic base of these island communities. Such an impact would cascade through local services and populations, threatening the long-term social and economic viability of these settlements. It is therefore imperative to recognise that the proposal poses a fundamental risk to the sustainability of these island communities.

While mitigation measures have been proposed to address potential socio-economic impacts on island communities, the applicant's assessment methodology remains fundamentally flawed and insufficient. Notably, the applicant's own consultants acknowledged habitability as a potentially significant pathway through which the proposal could affect island communities. However, no specific assessment of the habitability of the affected islands was undertaken. Instead, Chapter 18 of the socio-economic assessment focuses primarily on regional-level analysis, examining port communities in detail but neglecting an equivalent place-based assessment of the island communities directly facing the development. Despite this omission, the assessment concludes that these island communities exhibit low sensitivity to tourism-related effects, a conclusion reached without robust, localized analysis.

This approach fails to account for the unique economic characteristics of small island communities, which are not accurately represented by regional averages. Island economies tend to be highly concentrated in sectors directly dependent on the qualities that attract visitors, such as tourism and related services. Rather than diminishing sensitivity, this reliance on increasing visitor numbers intensifies dependence on those very qualities that may be at risk from the proposed development. Therefore, the conclusion of low sensitivity to tourism impacts, derived without any place-based analysis, cannot be considered evidence-based but instead represents an unsubstantiated assumption. Consequently, the socio-economic assessment does not provide a reliable basis for understanding or mitigating potential impacts on island communities.

The proposal fails to demonstrate compliance with key policy and statutory requirements designed to protect island communities, as set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions must be based on robust socio-economic evidence and apply a precautionary approach when such evidence is lacking. Furthermore, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 explicitly require that the interests of island communities be assessed thoroughly and given appropriate weight through meaningful engagement from the earliest stages to the conclusion of the decision-making process. Despite recognising the necessity for particular scrutiny of island communities, the applicant has not undertaken the comprehensive assessment needed to understand the proposal's effects on these communities. Consequently, it has not demonstrated compatibility with sustainable island communities, nor has it satisfied the statutory

duties owed to them. Given these significant shortcomings, the proposal cannot be considered acceptable in terms of its impact on island communities.

1.1.440 Ecology, Biodiversity and Habitats Regulations

The applicant's evidence confirms that Priority Marine Features and Annex I habitats are present within the development area, with surrounding waters supporting seabirds, marine mammals, and basking sharks. This ecological baseline establishes the site's significant environmental sensitivity. Given the scale and longevity of the proposed development—encompassing construction, operation, and decommissioning activities over several decades—there is a clear potential for substantial adverse effects on these protected species and habitats. Such impacts warrant thorough consideration to ensure that the ecological integrity of this nationally important marine environment is not compromised.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically addressing the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are customarily prepared in circumstances where it is not possible to exclude an adverse effect on the integrity of a protected site. The inclusion of these documents is a notable aspect of the application, as it acknowledges the potential for harm to the designated habitat. Furthermore, the applicant's own approach indicates that the Scottish Ministers may reach a different conclusion regarding adverse effects, underscoring the importance of these submissions in the overall assessment process. The preparation and presentation of these derogation and compensation documents demonstrate a recognition by the applicant of the environmental sensitivities involved and an intention to address potential impacts in accordance with statutory provisions.

Mitigation, compensation proposals, and future monitoring, while important considerations, do not in themselves satisfy the rigorous evidential requirements mandated by the Habitats Regulations. Consent for developments affecting protected habitats may only be lawfully granted when it is ascertained beyond reasonable scientific doubt that the integrity of the protected site will not be adversely affected. This high standard places the burden squarely on the applicant to demonstrate unequivocally that statutory tests are met, and mere reliance on mitigation measures cannot substitute for the necessary certainty demanded by law.

This stringent legal framework is reinforced through multiple policy instruments, including the Habitats Regulations, GEN 9 and GEN 13 of the National Marine Plan, and National Planning Framework 4 Policies 3, 4(b), 4(e), and 4(f). Together, they impose a strict control regime to ensure that any consent granted aligns with these protective requirements. Consequently, decision-makers must be satisfied that no reasonable scientific doubt remains before granting consent, thereby upholding the integrity of protected sites and adhering to established national policy standards.

The applicant's submissions, including their own derogation documents, fail to demonstrate compliance with the statutory tests designed to protect internationally important habitats and species. The evidence provided does not establish the requisite degree of certainty that these legally protected ecological features will be

safeguarded. This absence of demonstrable compliance undermines the foundation upon which the application's justification for consent rests.

The statutory framework imposes rigorous obligations to ensure that any development affecting internationally designated sites meets strict criteria, including the absence of alternatives and imperative reasons of overriding public interest. The applicant's failure to satisfy these tests, as reflected in their documentation, indicates a significant shortfall in meeting these legal standards. Consequently, the planning balance cannot be favourably weighed in support of the proposal.

In conclusion, given the clear insufficiency of evidence to confirm adherence to statutory protection requirements, consent should not be granted. The protection of internationally important ecological features is a paramount legal and policy imperative that must prevail in the decision-making process.

1.1.441 Cumulative and In-Combination Effects

The applicant's evidence clearly demonstrates that only a portion of the project is currently before the Scottish Ministers, with critical components such as the export cable corridor and onshore transmission works deferred to future applications. These elements are indispensable for the operation of the wind farm, yet their impacts are not assessed in conjunction with the main development proposal. This segmentation prevents a comprehensive evaluation of the project's overall effects, as the cumulative impacts will be considered piecemeal through separate consenting processes that follow the principal decision. Such an approach is fundamentally flawed both legally and procedurally, as it contradicts the established principle, upheld in the Raeshaw Farms case, that a project must be assessed in its entirety rather than being artificially divided into smaller parts whose individual impacts may seem less significant. Consequently, the current assessment method undermines the integrity of the decision-making process by failing to provide a holistic understanding of the project's true environmental and planning implications.

The cumulative impact assessments presented rely fundamentally on the conclusions drawn in other sections of the Environmental Impact Assessment. These underlying assessments of landscape, heritage, and socio-economic effects form the baseline from which cumulative impacts are evaluated. However, as previously demonstrated, these baseline assessments understate the true extent of the effects in each category.

Because the cumulative assessment is built upon these understated baselines, it inherently starts from a reduced point of reference. This methodological approach means that the combined effects of the proposed development alongside existing, consented, and foreseeable projects are likely to be significantly underestimated. The cumulative impact, therefore, does not accurately reflect the true scale or significance of the combined developments.

Given this reliance on flawed baseline assessments, the cumulative effects assessment cannot be regarded as reliable. It fails to provide a robust or comprehensive understanding of the overall impact, which calls into question the

validity of the conclusions drawn regarding the proposal's cumulative environmental and socio-economic consequences.

The failure to adequately address project splitting and cumulative effects within the application has significant practical implications for the decision-making process. Without a clear and comprehensive assessment of the proposal's combined impacts, including any deferred works, there is a substantial risk that adverse environmental consequences may be overlooked. This omission undermines the integrity of the environmental impact assessment and compromises the ability of regulators and stakeholders to make fully informed decisions.

This concern directly relates to the requirements set out in GEN 21 and paragraph 4.85 of the National Marine Plan, as well as NPF4 Policy 11(e), which collectively emphasise the necessity of properly identifying and assessing cumulative and in-combination effects. Moreover, the Environmental Impact Assessment Regulations specifically address project splitting to prevent the fragmentation of assessments that could mask the true scale and significance of impacts. The applicant has not demonstrated compliance with these provisions, as the cumulative and overall effects of the project have not been reliably identified or evaluated.

Accordingly, it is imperative that the decision-making process explicitly considers the treatment of deferred works and ensures that all potential impacts are transparently and comprehensively assessed. Addressing this deficiency is essential to uphold policy and regulatory standards and to ensure that any approvals granted are based on a sound understanding of the full environmental implications of the project as a whole.

1.1.442 Public Engagement, Site Selection and Environmental Information

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

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

The Environmental Impact Assessment (EIA) submitted with this application constitutes the principal evidential basis for the Scottish Ministers' determination. However, the issue is not the extent of the assessment but its sufficiency. The application identifies potential pathways to significant environmental effects but fails to investigate them adequately or employs methodologies that do not substantiate the conclusions presented. For example, the landscape assessment's results reflect a distance-based pattern not supported by its own stated methodology; the heritage assessment does not evidence the application of its integrity test; and the socio-economic assessment lacks place-based analysis pertinent to the affected islands. Such deficiencies undermine the reliability of the environmental information provided.

Furthermore, the application relies on future assessments, post-consent plans, monitoring regimes, and additional approvals to address outstanding environmental matters. This approach conflicts with the requirements of the EIA Regulations, which mandate that likely significant effects be fully understood prior to determination. Scottish Ministers are obliged to decide based on the evidence currently before them rather than assumptions that unresolved issues will be satisfactorily settled subsequently. The applicant has not demonstrated that the environmental information submitted is adequate to enable an informed decision, rendering the EIA insufficient for the purposes of this application.

1.1.443 Effects on Local Area

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

For Colonsay and Oronsay, the situation is particularly acute as the seaward outlook that shapes everyday life directly faces the proposed array. The North Colonsay and Western Cliffs Special Protection Area, which forms Colonsay's coastline, is central to the applicant's derogation case and compensation plan, highlighting an admission that harm to the internationally protected seabird population cannot be ruled out. This clearly signifies substantial environmental risks to the local ecology that are insufficiently addressed in the current assessment.

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

The applicant's assessment underestimates the scale and significance of the visual, community, and heritage impacts on Iona, leading to an incomplete evaluation of environmental and social effects. The Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity, with direct orientation towards the development, extensive visibility, and a large geographical extent of change. The turbines would be visible across approximately 21 kilometres, spanning around 39 degrees of the horizon, significantly affecting the ferry crossing between Fionnphort and Iona. Similarly, the west coast of Iona is recognised as highly sensitive with widespread visibility, and the applicant accepts that significant effects would occur for residents and visitors across much of the island, including at Dùn Ì, Iona's highest point.

Iona's monastic landscape, comprising internationally important heritage assets such as the Abbey, the Nunnery, and the high crosses, derives its significance from pilgrimage, arrival by sea, and movement through the landscape—factors acknowledged in the applicant's own baseline assessment. Despite Historic Environment Scotland's request for additional viewpoints, including from the ferry crossing itself, no visualisation has been provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, leaving an important perspective unassessed. Furthermore, a household consultation revealed that 92 per cent of respondents on Iona object to the proposal. Notably, the applicant's consultants identify habitability as a potential pathway of effect for this community, yet no assessment of this impact has been undertaken.

To contextualise the perceived scale of the turbines, the tallest proposed turbines would exceed the height of Ben Hynish on Tiree—141 metres tall and visible from Iona at approximately 33 kilometres—by about 194 metres, despite being located at roughly two-thirds of that distance. This comparison underscores the substantial visual dominance the turbines would have in the landscape. Taken together, these points demonstrate that the applicant's assessment fails to adequately capture the magnitude and significance of impacts on Iona, thereby compromising the reliability of the overall environmental and social impact evaluation.

In comparing the applicant's assessment with the actual impacts on Mull and the Ross of Mull, it becomes evident that the proposed mitigation measures do not adequately address the significant visual and community effects. While the applicant acknowledges significant effects at locations such as Erraid, on the Core Paths of the Ross, and at Fionnphort—the gateway to Iona and a vital point for visitor embarkation—these admissions highlight only a portion of the wider impacts experienced by these coastal communities. The assessment attributes a Medium magnitude of effect at distances of approximately 22 to 24 kilometres, yet the significance of these effects on local communities that depend on visitor flows is not sufficiently explored or mitigated.

Moreover, across Mull itself, the applicant concedes significant effects on Core Paths and within Local Landscape Areas including Central, South, and West Mull. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is correctly identified as having High sensitivity at distances ranging from 21 to 33 kilometres. However, the applicant's assignment of no more than Medium magnitude to this area appears inconsistent with the landscape's designation and its

importance to local tourism and wildlife. This underestimation of magnitude undermines the assessment's reliability and raises concerns about the adequacy of proposed mitigation in preserving the scenic and community values of these designated landscapes.

Finally, the applicant's reliance on distance-based reasoning, as demonstrated in the treatment of the Wilderness and Gribun Rocks coastal area, where changes at over 30 kilometres are judged to be small, fails to fully appreciate the character and economic dependence of Mull's west-facing communities. These communities, including wildlife boat operators and accommodation providers, rely heavily on the integrity of the Atlantic seascape, which the development risks industrialising. Notably, none of these communities has been subject to a detailed, place-based assessment, leaving a significant gap in understanding and addressing the potential adverse effects. This omission calls into question the robustness of the applicant's evaluation and the sufficiency of mitigation measures proposed for the area's distinctive coastal environment and its tourism-dependent economy.

The applicant's assessment of the potential effects on designated landscapes and island communities appears to underestimate the scale and significance of those effects, particularly when compared with the mitigation measures proposed. For example, while the assessment acknowledges the panoramic maritime qualities of Staffa within the Loch na Keal National Scenic Area, it concludes that the scale of change there would be small and the effect not significant, despite the island's status as one of the most celebrated small islands in Europe and its location approximately 35 kilometres from the development area. This conclusion sits uneasily with NatureScot's guidance to assess effects up to 30 kilometres, suggesting that important visual and experiential qualities may not have been fully accounted for.

Further concerns arise in relation to Ulva, also within the Loch na Keal National Scenic Area, which supports a small, re-establishing, community-owned population whose recovery depends heavily on the unspoilt seascape and setting threatened by the development. The absence of any specific assessment of effects on Ulva undermines confidence that the unique cultural and natural qualities vital to this vulnerable community have been adequately considered. Similarly, the Jura National Scenic Area, assessed at a distance of approximately 28 to 32 kilometres, is attributed a High sensitivity due to its wild and undeveloped Atlantic outlook, yet the applicant assigns only a Medium to Low magnitude of impact, citing distance and retained landforms as mitigating factors. This approach risks undervaluing the fundamental qualities upon which the designation is based.

The Scarba, Lunga and the Garvellachs National Scenic Area, situated roughly 35 to 40 kilometres from the development, receives an equivalent treatment, with limited recognition of potential adverse effects. Collectively, these assessments suggest a pattern of insufficient weighting given to the intrinsic wildness and cultural significance of these landscapes and island communities. To ensure the protection of their natural and cultural qualities, a more rigorous and comprehensive evaluation of impacts, including those on vulnerable island populations, is necessary. Without this, the planning balance remains uncertain, and the effectiveness of proposed mitigation measures is open to question.

The applicant's assessment significantly understates the magnitude of change and impact on Tiree's sensitive and distinctive landscape character, leading to an unreliable evaluation of effects. Specifically, the South Tiree coastal area is designated as having High sensitivity at approximately 35 kilometres distance, yet is attributed only a Low magnitude of change. This assessment fails to adequately reflect the unique characteristics of Tiree, which is an exceptionally low-lying island defined by the dominance of sea and sky. The island's highest point, Ben Hynish, rises merely 141 metres, making the introduction of turbines up to 335 metres in height an unprecedented vertical intrusion into the seascape. Given that Tiree's character rests on an open oceanic horizon, such tall structures would fundamentally alter the landscape's visual integrity. Therefore, the conclusion of Low magnitude for such an exposed and sensitive receptor is a clear understatement. In consequence, the applicant's evaluation cannot be considered reliable in respect of the effects on Tiree's landscape character.

The applicant's assessment fails to consider significant effects on mainland and island communities that maintain direct visual and economic connections with the seascape of the proposed development. This omission undermines the comprehensiveness of the environmental evaluation and risks overlooking impacts that could materially affect local livelihoods and community cohesion.

Gigha, a community-owned island celebrated as a national symbol of island regeneration, faces the development waters from the east. The finely balanced social and economic fabric of this community has not been examined in the assessment, despite its potential vulnerability to changes in seascape character. Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the receptors to which the applicant's distance-based visual impact moderation is applied, yet the significance of these views for tourism and local identity has not been adequately addressed.

Furthermore, the chain of communities along the west coast of Kintyre depends on the open Atlantic seaboard outlook towards Islay, Jura, and surrounding waters, which define their character and support their visitor economies. The Treshnish Isles, other small islands, and mainland coasts sharing views of the development area are similarly positioned. By excluding these receptors from thorough assessment, the applicant neglects the full scope of potential seascape effects, thereby compromising the robustness of the environmental appraisal. It is essential that these communities be fully considered to ensure a balanced and informed decision-making process.

The applicant's environmental impact assessment systematically moderates and discounts the magnitude of change experienced by highly sensitive receptors located beyond approximately 20 kilometres from the development site. This approach results in a quantified underestimation of significant effects on these receptors. Detailed analysis reveals that, in every instance where the assessment encounters such receptors at this distance, the reported magnitude of change is reduced, and consequently, the overall effect is diminished in the appraisal. Moreover, the communities residing within these areas have been deprived of any place-based assessment, leaving their specific circumstances and vulnerabilities unexamined. This methodological limitation undermines the integrity and comprehensiveness of

the environmental impact assessment, as it fails to accurately reflect the real extent of impacts on distant yet sensitive communities. In conclusion, the reliance on a distance-based threshold of approximately 20 kilometres leads to a systematic discounting of significant effects, which is neither justified nor appropriate for a robust evaluation of environmental consequences.

1.1.444 Personal Observations

In addition to the planning matters above, I am personally concerned because: My brother and his family live in Scotland. The next time I visit them, I would like to visit this area of Scotland. But I think these wind turbines will be an eyesore.

Based on my own local knowledge, I also wish to highlight that: I know the monks in the monastery in that area object to this development, and I trust their judgement on this issue as they have been in that area for so long.

1.1.445 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the relevant statutory and policy requirements, as demonstrated by the applicant's own evaluation. This assessment acknowledges considerable impacts upon nationally designated landscapes, as well as on the coastal communities and their heritage. However, subsequent scrutiny of the applicant's documentation reveals that these impacts have been consistently underestimated. Furthermore, the essential heritage assessment has not been undertaken, and although the adverse effects on the island communities within the project's vicinity were identified, they have never been subjected to a thorough evaluation. The ecological criteria necessary for approval have not been demonstrated as achievable, and notably, only a portion of the entire project is currently before the Scottish Ministers for consideration.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to deny the associated marine licence. Should the Ministers consider granting approval, I request that they require the submission of further environmental information alongside enhanced visual representations. Additionally, I propose that the applications be determined only following a public inquiry, thereby allowing a comprehensive examination of the issues raised in this objection. Regardless of the ultimate decision, I further request that the Ministers explicitly address and conclude on the impacts to cultural heritage and the affected island communities within their stated reasons.

Yours faithfully,

[Redacted]

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

Member of the public 547
Dear Sir/Madam,

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

The project in question envisages the development of an offshore wind farm with a generating capacity of approximately 2 gigawatts. This would involve the installation of between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip. The proposed site encompasses a Windfarm Development Area of around 448 square kilometres, situated to the north-west of Islay and west of Colonsay. It lies approximately 21 kilometres from Iona and is in close proximity to the islands and coastal communities of the southern Hebrides.

The forthcoming sections detail the planning and environmental grounds for objection, framed within the statutory and policy context that governs the determination of these applications. It is imperative to emphasise that the onus lies entirely with the applicant to provide compelling and sufficient evidence that all relevant statutory tests and policy criteria are met. Objectors are not required to substantiate contrary claims. Upon examination of the evidence submitted, it is clear that the applicant has failed to meet this evidential burden. Consequently, I contend that consent for the proposed development should be refused.

1.1.446 Seascape, Landscape and Visual Effects

The applicant’s written methodology, as set out in Appendix 16.1, notably omits any explicit distance threshold beyond which major effects are considered to cease. However, a published Evidence Note, developed in support of community objections and relying entirely on the applicant’s Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern across all three assessment streams. This pattern indicates that no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, irrespective of the receptor’s sensitivity or the extent of visibility. Furthermore, the applicant’s own documents acknowledge the influence of distance in these judgements. For instance, an assessment of a coastal area located over 30 kilometres away concludes that, due to the viewing distance, the scale of change is judged to be small. The Landscape Character synthesis further reinforces this by categorising High magnitude of change within roughly 20 kilometres, Medium magnitude between approximately 20 and 30 kilometres, and Low magnitude beyond 30 kilometres for certain landscape types.

This implicit reliance on distance thresholds has significant implications for the accuracy and reliability of the assessment. By systematically moderating magnitude at distances where the most sensitive designated landscapes are located, the

methodology effectively understates the inputs used in protective tests. Consequently, the conclusions drawn fail to provide a reliable description of the effects that Scottish Ministers are required to consider when deciding whether to grant consent. This undermines confidence in the robustness of the assessment and raises concerns that the potential impacts on key landscapes at greater distances may not have been fully or properly accounted for in the decision-making process.

The practical consequence of relying on the visualisation materials submitted in support of the assessment is that they do not provide a fully accurate representation of the development's visual impact as experienced on site. NatureScot's visualisation guidance, which the applicant follows, explicitly recognises that printed visualisations cannot replicate the true scale perceived by a viewer in the field. This inherent limitation means that any conclusions drawn solely from these materials risk underestimating or misrepresenting the development's prominence and effect within the landscape.

Furthermore, the wireline drawings included alongside the panoramic photographic projections share the same intrinsic constraints. As technical renderings embedded within the visualisations, they do not serve as independent tools to correct or enhance the photographic evidence. Instead, they are subject to the same perceptual and technical limitations, reducing their reliability as objective measures of visual impact. Consequently, caution must be exercised when interpreting these materials, and they should not be regarded as definitive evidence of the development's visual implications.

The practical consequence of the proposed development is the introduction of aviation and navigation lighting to a currently unlit sea horizon, resulting in a permanent alteration to the night-time seascape character for the duration of its stated 35-year operational life. This change would be perceptible and sustained, fundamentally affecting the visual experience and natural qualities of the seascape during nighttime conditions.

Beyond this timeframe, the policy implications must be carefully considered. Consenting to the development effectively signals that this seascape is appropriate for wind farm use, establishing a precedent that may influence future decisions. Thus, the impact on night-time seascape character is not merely a temporary effect but bears significant weight in the planning balance and the long-term management of seascape values.

There remains significant uncertainty regarding the proposal's compliance with key planning policies designed to safeguard landscape and seascape interests. The effects identified engage several provisions, notably NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. Critically, the applicant has failed to demonstrate that its conclusions about the scale of these acknowledged effects align with its own assessment methodology. Moreover, no satisfactory evidence has been provided to confirm that the proposal complies with policies aimed at protecting nationally important landscapes and seascapes. On this basis, it cannot be concluded that the proposal meets the necessary policy requirements.

1.1.447 Cultural Landscape, Archaeology and Historic Environment

There is significant uncertainty regarding the reliability of the applicant's heritage impact assessment due to apparent non-compliance with the prescribed evaluation methodology. Although the applicant states that Historic Environment Scotland's recognised approach has been followed—an approach that emphasises assessing whether changes to setting affect its contribution to cultural significance and whether the integrity of setting is retained, explicitly cautioning against equating visual change with adverse impact—the evidence indicates otherwise. A Methodological Audit, conducted independently and based solely on the applicant's own Appendix 14.3, finds that while the assessment identifies relevant heritage attributes and describes various aspects of visual change such as visibility, distance, and monument prominence, it fails to demonstrate the critical evaluative step required by the methodology: a clear assessment of how the integrity of setting has been maintained. In other words, the conclusion that the integrity of setting is adequately retained is not substantiated by the analysis presented. This omission calls into question the robustness and validity of the applicant's conclusions on heritage impacts.

The applicant's own baseline assessment acknowledges that the cultural significance of the affected heritage assets arises from a complex interplay of qualities, including pilgrimage, arrival by sea, and movement through a living cultural landscape. It recognises the importance of relationships between monuments, spirituality, and the surrounding landscape and seascape, all of which are experienced dynamically rather than through fixed viewpoints. This nuanced understanding underscores that heritage value extends beyond isolated features to encompass experiential and spatial dimensions that contribute to the overall cultural landscape.

Historic Environment Scotland's consultation responses, as recorded within the application documentation, highlight concerns that the applicant's assessment may not adequately capture these broader qualities. They specifically requested the inclusion of additional viewpoints to ensure a fuller representation of the cultural landscape's experiential aspects. This indicates a potential shortfall in the baseline assessment and suggests that the heritage impact appraisal may underestimate effects on the wider cultural and experiential context. Consequently, the assessment should be revisited to incorporate these broader perspectives, thereby providing a more comprehensive understanding of heritage impacts.

The practical consequence of the deficiencies identified in the landscape assessment is that the conclusions drawn regarding heritage impacts cannot be regarded as fully reliable. The heritage conclusions are explicitly dependent upon the findings of the landscape assessment; therefore, any understatement of landscape effects directly affects the accuracy of the heritage impact appraisal. This interdependency means that flaws in the landscape evaluation inevitably lead to a corresponding understatement in the heritage analysis.

It is clear that where landscape effects have been understated, as previously demonstrated, the heritage conclusions that rely upon those assessments inherit the same understatement. This creates a chain of understated impacts, whereby the

significance of harm to heritage assets may be minimized or overlooked altogether. The reliance on an incomplete or insufficiently rigorous landscape assessment undermines the credibility of the overall heritage impact conclusions presented.

In light of this, it is essential that the landscape assessment is robust and comprehensive, as it forms a critical foundation for understanding the full extent of heritage impacts. Without rectifying these shortcomings, the heritage conclusions remain questionable and cannot be confidently used to inform planning decisions. Therefore, the current heritage impact assessment should be reconsidered with a properly conducted landscape appraisal to ensure that all effects are accurately captured and reported.

The practical consequence of the current application is that it fails to provide the necessary assurance that important heritage assets will be adequately protected. This shortcoming directly undermines the proposal's acceptability, as the applicant has not supplied the required evidence to demonstrate that the cultural significance of heritage assets of international and national importance, as well as their settings, will be preserved. Without such demonstration, decision-makers cannot confidently conclude that the development complies with relevant heritage protection policies.

This deficiency engages a number of critical policy provisions. Specifically, the proposal falls short of the requirements set out in NPF4 Policy 7(h), which relates to scheduled monuments, and Policies 7(c) and 7(d), which concern the setting of heritage assets. In addition, it contravenes GEN 6 and the guidance contained within paragraphs 4.22 to 4.23 of the National Marine Plan. These policies and guidance collectively demand robust assessment and clear evidence that development will not harm the integrity or significance of designated heritage sites and their surroundings.

Given the absence of a comprehensive assessment and the failure to demonstrate compliance with these key policies, the Scottish Ministers do not have before them the necessary information to approve the application. The lack of evidence to protect heritage assets represents a fundamental policy conflict that cannot be overlooked. Consequently, the application should be refused on the grounds of insufficient heritage protection, in line with the established statutory and policy framework.

1.1.448 Effects on Island Communities, Tourism and the Local Economy

There remains significant uncertainty regarding the impact of the proposed development on the fundamental qualities that sustain the island communities concerned. These communities rely exceptionally heavily on visitors who are drawn specifically by attributes identified in the applicant's own baseline assessments, including the landscape, seascape, cultural heritage, tranquillity, and remoteness. Any alterations to these intrinsic qualities would directly undermine the economic foundation upon which these island populations depend. This, in turn, threatens the provision of local services, the stability of resident populations, and ultimately the long-term viability of these communities. It is therefore essential to recognise that the proposal poses a substantial risk to the economic and social sustainability of the island settlements by jeopardising the very characteristics that attract and support their visitor economy.

The applicant's socio-economic assessment fails to provide an adequate basis for mitigation, particularly in relation to island communities. While the assessment in Chapter 18 offers detailed analysis of potential port communities at a regional scale, it notably omits any place-based evaluation of the island communities directly affected by the proposal. This omission is critical given that the applicant's own consultants identified habitability as a potentially significant pathway through which the development could impact these communities; yet no specific assessment of island habitability was undertaken.

Island economies differ fundamentally from regional averages, as they are heavily concentrated in sectors most vulnerable to changes affecting the qualities that attract visitors. Rather than reducing sensitivity, reliance on increasing visitor numbers actually intensifies dependence on these at-risk attributes. Consequently, the assessment's conclusion that the island communities have low sensitivity to tourism effects is unsupported by evidence and rests solely on an unsubstantiated assumption. Without a place-based analysis tailored to the unique socio-economic context of the islands, the methodology is flawed and insufficient to understand or mitigate the true impacts on these vulnerable communities.

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

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

In conclusion, the statutory duties owed to island communities have not been discharged, and the proposal does not demonstrate compliance with the relevant planning policies. Given these deficiencies, the proposal cannot be considered acceptable in its current form. It is therefore respectfully requested that it be refused on the grounds of non-compliance with policy and statutory obligations regarding the protection of island communities.

1.1.449 Ecology, Biodiversity and Habitats Regulations

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

habitats within the development site underscores the high ecological value of the area.

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

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

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are typically prepared in circumstances where an adverse effect on the integrity of a protected site cannot be definitively ruled out. Their inclusion in the application package signals a recognition by the applicant of potential environmental impacts that may arise, necessitating mitigation and compensation measures to address any harm caused.

This approach implicitly acknowledges that the applicant's own assessment does not preclude the possibility that Scottish Ministers might reach a different conclusion regarding adverse effects on the protected site. Therefore, the submission of these documents serves not only as a demonstration of intent to manage and compensate for potential impacts but also as a procedural safeguard within the derogation framework. It reflects the applicant's awareness of the sensitivity of the site and the need to provide robust evidence to support any necessary derogation from conservation objectives.

Mitigation, compensation proposals, and future monitoring measures, while important components of development planning, do not alone satisfy the stringent statutory tests required under the Habitats Regulations. The competent authority must be assured beyond reasonable scientific doubt that the proposal will not adversely affect the integrity of the protected site before consent can be lawfully granted. This high evidential threshold places the onus squarely on the applicant to demonstrate compliance, rather than relying solely on proposed mitigation or compensation strategies.

This legal framework is reinforced by relevant policy provisions, including GEN 9 and GEN 13 of the National Marine Plan, alongside Policies 3, 4(b), 4(e), and 4(f) of NPF4. Together, these establish a comprehensive and rigorous approach to safeguarding protected habitats and species, ensuring that any development proposals undergo robust assessment consistent with the Habitats Regulations. Consequently, planning consent must be withheld unless these exacting requirements are fully met.

The applicant’s submissions, including the derogation documents provided, reveal a fundamental shortfall in demonstrating compliance with the statutory tests designed to safeguard internationally important habitats and species. This failure is evidenced by the lack of sufficient certainty that the requisite legal protections will be upheld. Without clear and convincing evidence that these tests can be satisfied, the proposed mitigation measures remain unproven and, by extension, unreliable as a means to protect the ecological features of international significance.

This deficiency undermines the case for granting consent, as adherence to the statutory tests is a legal prerequisite for development affecting such sensitive environmental assets. The applicant’s inability to meet these tests calls into question the soundness of the application and suggests that proceeding with approval would be inconsistent with the statutory framework intended to prevent harm to internationally important ecological interests. Consequently, the application should not be permitted to advance without satisfactory demonstration that all legal requirements have been fully addressed.

1.1.450 Cumulative and In-Combination Effects

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

The proposed cumulative impact assessment fails to provide a reliable evaluation, as it relies on baseline assessments that understate the true effects. Specifically, the Environmental Impact Assessment’s underlying evaluations of landscape, heritage, and socio-economic factors have already minimized the extent of adverse impacts. Consequently, the cumulative assessment, which is based on these same understated baselines, inevitably underestimates the combined effects of this development alongside other existing, consented, and foreseeable projects. This systemic flaw compromises the accuracy of the overall cumulative impact conclusions, rendering them insufficient for informed decision-making.

The failure to adequately consider the cumulative and in-combination effects of the proposal, including deferred works, compromises compliance with key planning policies and environmental regulations. Specifically, the requirements of GEN 21 and paragraph 4.85 of the National Marine Plan, alongside NPF4 Policy 11(e) and the EIA Regulations concerning project splitting, have not been met. The applicant has not reliably identified or assessed the overall impacts of the project as a whole. It is

therefore essential that the decision-making process explicitly addresses the treatment of deferred works to ensure full regulatory compliance and informed assessment.

1.1.451 Public Engagement, Site Selection and Environmental Information

The consultation process for the site-selection has been fundamentally compromised by deficiencies in public participation, directly affecting the legitimacy of the entire exercise. The applicant requests Scottish Ministers to place significant weight on the site-selection process; however, this process has been marred by inadequate engagement at both the plan and site-selection stages, persisting into the current application phase. Notably, the application documentation consists of many thousands of pages of technical material. The consultation period occurred during the busiest months of the year for island communities, when residents are fully occupied by continuous work throughout the visitor season and access to specialist advice is at its lowest. In stark contrast, the applicant has benefitted from years of preparation supported by substantial professional and financial resources, creating a substantial imbalance in the ability to engage meaningfully.

National planning policy, specifically GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, mandate that those affected by decisions of this scale must have a realistic and fair opportunity to participate. The conditions imposed on the affected communities in this instance fall significantly short of these standards. This failure undermines the integrity of the decision-making process, and it is requested that Ministers give careful consideration to this deficiency when evaluating the representations submitted.

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

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

1.1.452 Effects on Local Area

The applicant's assessment significantly underestimates the direct and substantial effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, calling into question the reliability of the overall environmental and heritage impact evaluation. Islay and Colonsay lie immediately adjacent to the proposed development area, which spans 448 square kilometres; yet Islay is primarily considered only as a potential project location rather than as an affected island community in its own right. This approach neglects the Atlantic-facing communities of Islay, which border the development's closest edge and lack any place-based assessment of impacts on their setting, local economy, or community life. Similarly, Colonsay and Oronsay face the development area directly across their seaward outlook, integral to their daily experience. The North Colonsay and Western Cliffs Special Protection Area, located on Colonsay's coastline, is the subject of the applicant's derogation case and compensation plan, implicitly acknowledging that harm to its internationally protected seabird population cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance within this community, suffers from the same shortcomings identified elsewhere in the heritage assessment, particularly in relation to the evaluation of its open maritime setting. Taken together, these deficiencies demonstrate that the assessment fails to adequately address the significant and direct effects on these island communities and their heritage.

The practical consequence of the applicant's assessment is a substantial underestimation of the visual and social impacts on Iona, which affects the reliability of the environmental and social impact evaluation. The Coastal Character assessment clearly identifies the Sound of Iona as having high sensitivity, with direct orientation towards the proposed development and extensive visibility. The turbines would be visible across a large geographical area, approximately 21 kilometres away, spanning about 39 degrees of the horizon. This significant visual intrusion extends to the West Coast of Iona, also recognised as highly sensitive with widespread visibility. The applicant concedes that residents and visitors throughout much of the island, including those at Dùn Ì—its highest point—would experience significant effects. Notably, the scale of the turbines is considerable when compared to familiar landmarks; for instance, the tallest turbines would exceed Ben Hynish on Tiree, a 141-metre high landmark seen from Iona at 33 kilometres, by around 194 metres despite being visible at only two-thirds of that distance.

Furthermore, the assessment fails to adequately account for Iona's internationally important monastic heritage, which is intrinsically linked to pilgrimage, arrival by sea, and landscape movement. Historic Environment Scotland's request for additional visualisations, including viewpoints from the ferry crossing and elevated ground such as Càrn Cùl ri Èirinn above St Columba's Bay, has not been met, leaving a critical gap in understanding the heritage impact. Community perspectives further highlight this shortfall: a household consultation revealed that 92 per cent of respondents on Iona oppose the proposal. Despite this, the applicant's own consultants identified habitability as a potential pathway for impact on the community, yet no assessment of this has been undertaken. Taken together, these omissions and understatements compromise the accuracy of the overall impact evaluation and raise serious concerns about the adequacy of the applicant's approach.

The applicant's assessment recognises that the Ross of Mull South coastal area is of High sensitivity at distances of approximately 22 to 24 kilometres and attributes a Medium magnitude of effect. It further accepts that significant effects would occur at Erraid and on the Core Paths of the Ross, as well as at Fionnphort, which serves as the gateway to Iona and the embarkation point for visitors. This community is notably the most directly affected by visitor flows. Across Mull more generally, the applicant acknowledges significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Areas. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is consistently assessed as having High sensitivity over distances of roughly 21 to 33 kilometres, but is nonetheless only attributed a Medium magnitude of effect.

However, the applicant's reliance on viewing distance to moderate the perceived scale of change is exemplified by the assessment of the Wilderness and Gribun Rocks coastal area, where the effect is judged small due to distances exceeding 30 kilometres. This distance-based reasoning fails to fully capture the nature of impact on distant but visually and culturally significant landscapes. Crucially, Mull's west-facing tourism economy, including its wildlife boat operations and accommodation sectors within western townships, depends heavily on the intactness of the Atlantic seascape. The development would effectively industrialise this seascape, yet none of these tourism-dependent communities has been subject to a place-based assessment.

Therefore, while the applicant acknowledges certain significant effects, the assessment underestimates the full extent of visual, economic, and community impacts on Mull and the Ross of Mull, particularly in relation to designated landscapes and the sustainability of tourism-dependent communities.

The applicant's assessment of the impacts on wider seaboard designated landscapes and island communities appears to underestimate significant effects, particularly when compared to the mitigation standards typically applied to sensitive areas. For instance, Ulva, a community-owned island within the Loch na Keal National Scenic Area, is at the outset of its regeneration and relies heavily on the unspoilt seascape and setting, qualities that remain unassessed in the application despite being integral to the island's recovery. Similarly, Staffa, one of Europe's most celebrated small islands and also within the Loch na Keal National Scenic Area, lies approximately 35 kilometres from the development. This exceeds the 30 kilometre assessment boundary suggested by NatureScot, yet the applicant concludes the effects there would be small and not significant, even though their own evaluation acknowledges the panoramic maritime qualities of the location.

Further, the Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed with High sensitivity at a distance of 28 to 32 kilometres but is attributed only Medium to Low magnitude of effect, justified by distance and retained landforms. This approach is similarly applied to the Scarba, Lunga and the Garvellachs National Scenic Area, situated approximately 35 to 40 kilometres away. Such treatment fails to adequately reflect the intrinsic qualities that underpin these designations. Taken together, these assessments omit the full extent of potential impacts on the natural and cultural qualities of these designated landscapes and the

vulnerable island communities that depend on them, thereby undermining their protection and the integrity of the wider seaboard environment.

The applicant's assessment attributes a Low magnitude of change to the South Tiree coastal area despite recognising its High sensitivity at approximately 35 kilometres. This conclusion contrasts sharply with the nature of the receptor, as Tiree's landscape character is exceptionally distinctive and vulnerable. Unlike other areas where vertical structures may be more commonplace or mitigated by existing features, Tiree's topography is uniquely low-lying and defined by its openness to sea and sky.

Tiree's highest elevation, Ben Hynish, reaches only 141 metres, while the proposed turbines would rise to 335 metres, introducing unprecedented vertical elements into an otherwise horizontal seascape. This significant alteration to the island's defining characteristics cannot be adequately captured by a Low magnitude rating. Such an understatement leads to an unreliable evaluation of the impacts on Tiree's sensitive landscape character, warranting a reassessment that properly reflects the scale of change proposed.

The applicant's assessment notably omits consideration of significant effects on mainland and island communities that have direct visual and economic connections to the seascape in question. Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by residents, faces the development waters from the east. Despite its finely balanced community and economy, the potential impacts on Gigha have not been examined. Similarly, Ardnamurchan Point, the most westerly point of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas represent precisely the type of receptors that are subject to undue distance-based moderation within the applicant's assessment, thereby undervaluing their sensitivity. Additionally, the west coast of Kintyre comprises a chain of communities whose outlook, character, and visitor economy are intrinsically linked to the open Atlantic seaboard facing Islay, Jura, and the surrounding waters. The Treshnish Isles and other small islands and mainland coasts with views towards the development area share this same reliance and exposure. The failure to address the effects on these communities compromises the comprehensiveness and robustness of the applicant's environmental and socio-economic evaluation, raising concerns over the completeness of the submitted evidence.

The applicant's assessment methodology employs a distance-based approach which systematically moderates the magnitude of change and discounts the effects on sensitive receptors located beyond approximately 20 kilometres. As noted in the submitted evidence, wherever the assessment encounters a highly sensitive receptor beyond this threshold, the effect is diminished in significance, despite the presence of such receptors. This approach results in an absence of place-based evaluation for the communities affected at these greater distances, thereby overlooking localized impacts that may be considerable.

This systematic moderation undermines the integrity of the environmental impact assessment by failing to fully account for the potential effects on distant but sensitive

receptors. The reliance on a rigid distance criterion to reduce the perceived magnitude of change does not reflect the nuanced realities experienced by affected communities, who have received no tailored or specific assessment of the impacts they face. Consequently, the assessment does not provide a comprehensive or accurate appraisal of environmental effects beyond 20 kilometres, calling into question the robustness of its conclusions and the adequacy of the mitigation measures proposed.

1.1.453 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the necessary statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the coastal communities and heritage. However, independent reviews of the applicant's submitted documents reveal that these impacts have been understated. Moreover, the requisite heritage assessment has not been undertaken, and while the effects on the island communities within the project's vicinity were identified, they have never been properly evaluated. The ecological safeguards and tests mandated for such developments have not been demonstrated as achievable. Compounding these issues, only a portion of the project falls under the jurisdiction of the Scottish Ministers.

In light of these shortcomings, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to deny the associated marine licence. Should the Ministers consider otherwise, I request that the applicant be required to provide additional environmental information and enhanced visual representations. Furthermore, I recommend that the determination of these applications be deferred until after a public inquiry, thereby allowing the concerns raised in this objection to be fully scrutinised. Regardless of the final decision, I also call upon the Ministers to include explicit conclusions within their reasons concerning the impacts on cultural heritage and the affected island communities.

Yours faithfully,

[Redacted]

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

Member of the public 548
Dear Sir/Madam,

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

The proposed development involves the establishment of an offshore wind farm with an installed capacity in the region of 2 gigawatts. This would consist of between 91 and 144 turbines, each with a maximum height reaching up to 335 metres to blade tip. The site encompasses a Windfarm Development Area extending over approximately 448 square kilometres of marine environment, situated to the north-west of Islay and west of Colonsay. Notably, the location lies approximately 21 kilometres from Iona and is in close proximity to various islands and coastal communities within the southern Hebrides.

The following considerations articulate the grounds for objection, framed within the relevant statutory and policy context governing the decision-making process for these applications. It is important to emphasise that the onus lies squarely with the applicant, MachairWind Limited (ScottishPower Renewables), to provide robust and comprehensive evidence demonstrating compliance with all applicable tests. Objectors bear no obligation to disprove the proposals. On the basis of the evidence and arguments presented herein, the applicant has failed to satisfy this evidential burden, and consequently, the applications ought to be refused consent.

1.1.454 Effects on Local Area

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

1.1.455 Personal Observations

In addition to the planning matters above, I am personally concerned because: Yes

Based on my own local knowledge, I also wish to highlight that: Yes

Finally, I would also ask the Scottish Ministers to consider: Agsinst

1.1.456 Summary

The proposal for the MachairWind Offshore Wind Farm fails to demonstrate compliance with the relevant statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the cultural heritage and communities along this coastal region. However, independent analysis of the submitted documents reveals that the extent of these impacts has been understated. Crucially, the necessary heritage assessment has not been conducted, and although the effects on the island communities affected were identified, no formal assessment of these impacts has been undertaken. Furthermore, the ecological criteria required by law have not been demonstrated as achievable. It is also pertinent to note that the application before the Scottish Ministers concerns only a portion of the entire project.

Given these substantial deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to deny the associated marine licence. Should the Ministers consider otherwise, I request that they require the submission of further environmental information alongside enhanced visualisations. Moreover, I propose that the application be determined following a public inquiry, enabling a thorough examination of the issues raised in this objection. Regardless of the final decision, I ask that the Ministers explicitly address and provide clear conclusions on the effects of the proposal on cultural heritage and the impacted island communities within their stated reasons.

Yours faithfully,

[Redacted]

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

Member of the public 549
Dear Sir/Madam,

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

The project in question seeks approval for an offshore wind farm with an installed capacity of approximately 2 gigawatts. It would comprise between 91 and 144 wind turbines, each with a maximum blade tip height of up to 335 metres. The proposed development site spans an extensive Windfarm Development Area of around 448 square kilometres, situated to the north-west of Islay and to the west of Colonsay. This location lies approximately 21 kilometres from the island of Iona and is in close proximity to the islands and coastal communities of the southern Hebrides.

This objection is founded upon a detailed consideration of the planning and environmental implications of the proposal, as evaluated against the statutory and policy framework governing the determination of such applications. It is incumbent upon the applicant to provide compelling and sufficient evidence demonstrating that all relevant tests and criteria are met. The onus of proof does not rest upon objectors to establish contrary positions. Having reviewed the submissions and associated evidence, it is clear that the applicant has failed to meet this burden. Consequently, consent for the MachairWind Offshore Wind Farm should be refused.

1.1.457 Seascape, Landscape and Visual Effects

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

This implicit distance-based moderation of magnitude has significant implications for the reliability of the assessment outcomes. By systematically reducing the estimated magnitude of effects at distances where the most sensitive designated landscapes are situated, the methodology effectively understates the potential impacts. Consequently, the protective tests applied within the assessment are based on these

diminished inputs, leading to conclusions that do not accurately reflect the true scale of effects that the Scottish Ministers are being asked to consent. In this regard, the methodology undermines the robustness and transparency of the environmental assessment, raising substantial concerns about the validity of its findings and the adequacy of protections afforded to sensitive landscapes.

1.1.458 Cultural Landscape, Archaeology and Historic Environment

The practical consequence of the identified deficiencies in the landscape assessment is that the conclusions drawn regarding heritage impacts cannot be regarded as fully reliable. This is because the heritage conclusions are directly dependent on the landscape assessment. Any understatement of landscape effects inevitably leads to a corresponding understatement in the assessment of heritage impacts.

It is therefore essential to recognise that if the landscape effects have been minimised or overlooked, the heritage assessment built upon these findings will inherit the same shortcomings. This interdependency means that the overall evaluation of the proposal's impact on heritage assets is compromised by the initial landscape analysis.

In light of this, the credibility of the heritage impact conclusions is fundamentally undermined. A robust and accurate landscape assessment is a prerequisite for a sound heritage impact appraisal, and without it, the conclusions presented must be treated with caution.

1.1.459 Effects on Island Communities, Tourism and the Local Economy

The practical consequence of the proposed development is a direct threat to the fundamental economic and social sustainability of the island communities affected. These communities rely exceptionally heavily on visitors, whose presence underpins local businesses, services, and population stability. Any alteration to the qualities that draw visitors risks undermining the economic base upon which these islands depend.

The applicant's own baseline assessments identify the key attractions for visitors as the landscape, seascape, cultural heritage, tranquillity, and remoteness of the area. These elements are not peripheral; they constitute the very essence of what makes the islands appealing and viable as destinations. Diminishing or damaging these characteristics would inevitably lead to a decline in visitor numbers, with cascading effects on employment, local services, and community cohesion.

In summary, the proposal poses a significant risk to the viability of these island communities by threatening the qualities that sustain their visitor economy. Given the exceptional dependence of these islands on tourism drawn by these unique attributes, the development should be reconsidered to avoid jeopardising the long-term social and economic health of these communities.

1.1.460 Ecology, Biodiversity and Habitats Regulations

The applicant's evidence confirms that Priority Marine Features and Annex I habitats are present within the development area, with surrounding waters supporting seabirds, marine mammals, and basking sharks. This ecological baseline establishes the site's significant environmental sensitivity. Given the scale and longevity of the proposed development—encompassing construction, operation, and decommissioning activities over several decades—there is a clear potential for substantial adverse effects on these protected species and habitats. Such impacts warrant thorough consideration to ensure that the ecological integrity of this nationally important marine environment is not compromised.

1.1.461 Public Engagement, Site Selection and Environmental Information

The practical consequence of the inadequacy of the Environmental Impact Assessment (EIA) submitted with this application is that the Scottish Ministers are unable to make an informed and lawful decision. The EIA is the principal evidential basis for determination, and its sufficiency, rather than its extent, is the critical issue. The application acknowledges potential pathways to significant environmental effects but fails to investigate these thoroughly or relies on assessment methodologies that do not substantiate the conclusions presented. For example, the landscape assessment produces outcomes based on a distance-related pattern that is not supported by the methodology outlined in the report itself; the heritage assessment fails to demonstrate the application of its own integrity test; and the socio-economic assessment lacks any place-based analysis of the islands that would be affected.

Furthermore, the application's reliance on future assessments, post-consent plans, ongoing monitoring, and additional approvals is inconsistent with the requirements of the EIA Regulations. These regulations mandate that all likely significant effects must be properly understood and assessed before any determination is made. The approach taken by the applicant, which defers key elements of environmental assessment and mitigation to later stages, does not satisfy this fundamental regulatory requirement and leaves the decision-making process inadequately informed.

In light of these considerations, it is clear that the environmental information provided is insufficient for the Scottish Ministers to discharge their duty effectively. The applicant has not demonstrated that the evidence submitted meets the necessary standards to enable a proper evaluation of the potential significant effects of the proposal. Therefore, the application should not be granted consent until a comprehensive and robust EIA, compliant with statutory obligations, is provided.

1.1.462 Effects on Local Area

There is considerable uncertainty regarding the accuracy of the applicant's assessment of visual, community, and heritage impacts on Iona, which appears to underestimate both the scale and significance of these effects. The Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity, with direct orientation towards the development, extensive visibility, and a large geographical extent of change. The overall effect is described as moderate and significant, with turbines spanning approximately 39 degrees of the horizon over a distance of about 21 kilometres, notably affecting the ferry crossing between

Fionnphort and Iona. Similarly, the highly sensitive west coast of Iona is subject to widespread visibility of the proposal, and the applicant acknowledges significant effects on residents and visitors across much of the island, including from Dùn Ì, its highest point. Crucially, Iona's monastic landscape, encompassing internationally important heritage assets such as the Abbey, Nunnery, and high crosses, is valued for pilgrimage and sea arrival, yet visualisations from key vantage points requested by Historic Environment Scotland—such as the ferry crossing and raised ground above St Columba's Bay at Càrn Cùl ri Èirinn—have not been provided. Community concerns are profound; a household consultation revealed that 92 per cent of Iona respondents object to the proposal, yet the applicant's own consultants identified habitability as a potential pathway of effect that remains unassessed. The perceived scale of the turbines is further emphasised by comparison with Ben Hynish on Tiree, a 141-metre landmark visible from Iona at approximately 33 kilometres, which would be overtopped by the proposed turbines by around 194 metres at roughly two-thirds of that distance. Taken together, these factors indicate that the applicant's evaluation does not fully capture the extent or significance of impacts on Iona, undermining the reliability of the environmental and social impact assessment.

The applicant's assessment recognises that the Ross of Mull South coastal area is of High sensitivity at distances of approximately 22 to 24 kilometres and attributes a Medium magnitude of impact. It concedes significant effects at locations such as Erraid and on the Core Paths of the Ross of Mull. Furthermore, the applicant acknowledges that Fionnphort, serving as the gateway to Iona and the embarkation point for crossings, would experience a significant effect; this community is directly tied to the flow of visitors dependent on the visual and environmental quality of the area.

Across the wider island of Mull, the applicant also accepts significant effects on Core Paths and within Local Landscape Areas including Central, South, and West Mull. Notably, the Loch na Keal National Scenic Area, which encompasses Mull's western waters and islands and is assessed as having High sensitivity over distances of approximately 21 to 33 kilometres, is attributed no more than a Medium magnitude impact. This suggests a degree of inconsistency in the evaluation of the sensitivity and magnitude of effects within designated landscapes and raises questions about the thoroughness of the impact characterisation.

The approach taken in assessing the Wilderness and Gribun Rocks coastal area further exemplifies the limitations of the applicant's methodology. Despite the viewing distance exceeding 30 kilometres, the applicant judges the scale of change to be small, explicitly relying on distance-based reasoning. This overlooks the reliance of Mull's west-facing tourism economy, including wildlife boat operations and accommodation providers in western townships, on the integrity of the Atlantic seascape. These communities, which would face the industrialisation of a valued seascape, have not received the place-based assessment necessary to fully understand the economic and community impacts. Therefore, while the applicant's evidence acknowledges certain effects, the assessment falls short in comprehensively addressing the significant visual, economic, and community consequences for Mull and the Ross of Mull coastal communities and landscapes.

The applicant’s assessment recognises the presence of Ulva within the Loch na Keal National Scenic Area and acknowledges its status as a community-owned island undergoing regeneration. Ulva’s recovery is dependent on the preservation of its natural setting and unspoilt seascape, yet the applicant has not undertaken any specific assessment of the effects on this small, re-establishing community. Similarly, Staffa, located approximately 35 kilometres from the development area and within the same National Scenic Area, is identified as one of Europe’s most celebrated small islands. Despite this, the applicant concludes that the scale of change at Staffa would be small and the effects not significant, even though their own evaluation recognises its panoramic maritime qualities. This conclusion is drawn despite Staffa lying beyond the 30-kilometre distance within which NatureScot requested an effects assessment.

Further afield, the applicant assesses the Jura National Scenic Area, situated about 28 to 32 kilometres from the development site, as having High sensitivity but attributes a Medium to Low magnitude of impact. This moderation is justified by distance, apparent scale, and retained landforms, notwithstanding that the designation of Jura rests on its wild, undeveloped Atlantic outlook. The same approach is applied to the Scarba, Lunga, and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres away. Such treatment underestimates the significance of these designated landscapes and the vulnerabilities of the island communities they encompass, thereby undermining the protection of their natural and cultural qualities.

1.1.463 Personal Observations

In addition to the planning matters above, I am personally concerned because: I am Danish and have stayed on Iona many times. These Hebrides are special places with wildlife and historic places which should be protected fir tve sake of nature, culture and persons

1.1.464 Summary

The proposal under consideration fails to demonstrate compliance with the relevant statutory and policy frameworks governing its determination. The applicant’s own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal region. However, published analyses of the applicant’s submissions reveal that these impacts have been understated. Furthermore, the essential heritage assessment has not been undertaken. While the proposal identifies potential effects on the island communities involved, it does not include an assessment of these impacts. In addition, the ecological requirements have not been proven to be capable of being met. Compounding these issues, only a portion of the overall project is currently before the Scottish Ministers for consideration.

Given these substantial shortcomings, it is respectfully urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm proposal and decline the associated marine licence. Should the Ministers consider not refusing consent outright, it is requested that they require the submission of additional environmental information along with enhanced visualisations. Moreover, the

applications should only be determined following a public inquiry, thereby allowing thorough examination of the concerns raised in this objection. Regardless of the final decision, it is further requested that the Ministers explicitly address and state their conclusions regarding the impacts on cultural heritage and the island communities affected.

Yours faithfully,

[Redacted]

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

Member of the public 550
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, detailed in applications 00012385 for consent under section 36 of the Electricity Act 1989, and 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. The applications, lodged by MachairWind Limited (ScottishPower Renewables), seek approval for the construction and operation of an offshore wind farm with an installed capacity of approximately 2 gigawatts. The scheme envisages between 91 and 144 turbines, each reaching a maximum blade tip height of 335 metres, positioned within a designated Windfarm Development Area encompassing around 448 square kilometres of marine space situated north-west of Islay and west of Colonsay. This location lies approximately 21 kilometres from Iona and lies in close proximity to the islands and coastal communities of the southern Hebrides.

I request that my objection be formally registered and that I receive notification of the final determination on these applications. The following sections delineate the planning and environmental grounds for my opposition, framed within the statutory and policy context governing the assessment of such proposals. It is important to emphasise that the onus lies squarely on the applicant to substantiate, with adequate and compelling evidence, that all applicable tests and criteria have been satisfied. Objectors bear no obligation to disprove the proposals. In light of the arguments presented herein, I contend that the applicant has failed to meet this evidential burden, and accordingly, the applications should be refused consent.

1.1.465 Seascape, Landscape and Visual Effects

The visualisation materials submitted in support of the assessment exhibit inherent technical and perceptual limitations that must be acknowledged at the outset. According to NatureScot’s visualisation guidance, which the applicant follows, printed visualisations are unable to fully replicate the scale and spatial experience that a viewer perceives on site. This fundamental constraint affects the reliability of the visual evidence as a true representation of the development’s impact.

Furthermore, the wireline drawings included within the panoramic visualisations do not provide an independent verification or correction of the photographic images they accompany. Instead, they function as technical renderings embedded within the visualisation framework and therefore share the same inherent limitations. Taken together, these factors indicate that the visual materials should be interpreted with caution, recognising their partial rather than definitive portrayal of visual effects.

The development would introduce aviation and navigation lighting to a sea horizon that is presently unlit, permanently altering the character of the night-time seascape for the stated 35-year operational life. This change is significant because the current absence of such lighting contributes to the natural quality and tranquillity of the nocturnal seascape. Moreover, the operational lifespan does not limit the policy harm: consenting to this development effectively designates this seascape as appropriate for wind farm use, thereby accepting the permanent alteration of its

night-time character. This has important implications for the protection of seascape qualities under relevant policy considerations.

The proposal fails to comply with the requirements of key planning policies designed to safeguard landscape and seascape interests. Specifically, the effects identified engage NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. Despite recognising these effects, the applicant has not demonstrated that its conclusions regarding their scale are consistent with its own assessment methodology. Furthermore, no evidence has been provided to show compliance with the policies protecting nationally important landscapes and seascapes. On this basis, it is clear that the proposal does not meet the necessary policy standards and should not be supported.

1.1.466 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment acknowledges that the cultural significance of the affected heritage assets is derived from a complex interplay of qualities, including pilgrimage routes, arrival by sea, movement through a living cultural landscape, and the interrelationships between monuments, spirituality, and the surrounding landscape and seascape. These qualities are primarily experienced dynamically, through movement, rather than from fixed viewpoints. However, the mitigation measures proposed appear to focus predominantly on visual impacts from selected static vantage points, which risks underrepresenting the broader experiential and cultural landscape values identified in the baseline.

This concern is reinforced by Historic Environment Scotland's consultation responses, as recorded within the application, which specifically requested additional viewpoints to ensure these wider cultural qualities are properly captured. The omission of such viewpoints in the applicant's assessment suggests an incomplete understanding of the heritage assets' significance and potentially inadequate mitigation of impacts on the overall cultural landscape. For a robust and comprehensive evaluation, it is essential that the assessment fully incorporates the living, dynamic nature of the heritage setting, beyond isolated visual perspectives.

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

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

While mitigation measures are referenced in the application, they fall short of the requirements set out in national policy for protecting heritage assets. Specifically, the proposal fails to comply with NPF4 Policy 7(h) concerning scheduled monuments, as

well as Policies 7(c) and 7(d) related to the setting of heritage sites, in conjunction with GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. The applicant has not provided sufficient evidence to demonstrate that the cultural significance of internationally and nationally important heritage assets, along with their settings, will be safeguarded. Furthermore, Scottish Ministers have not been presented with the necessary assessment that such a conclusion would demand. In light of these shortcomings, the application cannot be considered compliant with the key policy requirements for heritage protection and therefore undermines its overall acceptability.

1.1.467 Effects on Island Communities, Tourism and the Local Economy

While mitigation measures may seek to address certain impacts, they fall short in safeguarding the essential qualities that underpin the economic and social fabric of the island communities affected by this proposal. These communities depend to an exceptional degree on visitors, who are drawn specifically by the attributes identified in the applicant's own baseline assessments: landscape, seascape, cultural heritage, tranquillity and remoteness. Any alterations to these defining characteristics strike directly at the economic base of these communities. Such a disruption threatens not only local services and population stability but also the long-term viability of these island communities themselves. Consequently, the proposal poses a fundamental risk to their economic and social sustainability.

The practical consequence of the applicant's approach is a fundamental underestimation of the potential socio-economic impacts on island communities directly affected by the proposal. While the applicant's consultants acknowledge habitability as a significant pathway for impact, no specific assessment of the habitability of these islands has been undertaken. Instead, the socio-economic assessment in Chapter 18 focuses primarily on regional port communities with detailed analysis, neglecting an equivalent, place-based assessment of the island communities themselves. Despite this lack of focused analysis, the assessment nonetheless concludes that these island communities exhibit low sensitivity to tourism effects, a conclusion that lacks substantive evidential basis.

This conclusion fails to recognise the unique economic characteristics of small island communities, which cannot be accurately represented by regional averages. Island economies are typically concentrated in sectors highly sensitive to changes in the environmental qualities that attract visitors. Moreover, an increasing dependence on visitor numbers intensifies, rather than mitigates, this sensitivity. Without place-specific analysis, the assertion of low sensitivity amounts to an unsubstantiated assumption rather than evidence-based reasoning. Consequently, the socio-economic assessment methodology is flawed and insufficient to properly understand or mitigate the impacts on the island communities facing the development.

The proposal fails to comply with essential policy and statutory requirements concerning island communities, resulting in inadequate protection and assessment of their interests. This practical deficiency undermines the integrity of the decision-making process and risks adverse socio-economic impacts on these communities, which depend on thorough and careful evaluation.

In accordance with GEN 19 and paragraph 4.81 of the National Marine Plan, decision-making must be founded on robust socio-economic evidence and adopt a precautionary approach when such evidence is insufficient. Additionally, NPF4 Policy 11(c) alongside the Islands (Scotland) Act 2018 explicitly mandates that the interests of island communities be assessed and given appropriate weight through meaningful engagement from the earliest stages of development through to conclusion. These provisions collectively ensure that island communities are not overlooked or disadvantaged by development proposals.

However, the applicant has acknowledged the need for particular scrutiny of island communities but has failed to conduct the necessary assessments to understand the proposal's effects on them. Consequently, there is no demonstrated compatibility with the aim of sustaining island communities, nor evidence that the statutory duties owed to these communities have been fulfilled. This omission represents a clear non-compliance with the relevant policy framework, and accordingly, the proposal should not be supported.

1.1.468 Ecology, Biodiversity and Habitats Regulations

The applicant's evidence confirms that Priority Marine Features and Annex I habitats are present within the development area, with surrounding waters supporting seabirds, marine mammals, and basking sharks. This ecological baseline establishes the site's significant environmental sensitivity. Given the scale and longevity of the proposed development—encompassing construction, operation, and decommissioning activities over several decades—there is a clear potential for substantial adverse effects on these protected species and habitats. Such impacts warrant thorough consideration to ensure that the ecological integrity of this nationally important marine environment is not compromised.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically aimed at addressing potential impacts on the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are typically prepared in circumstances where an adverse effect on the integrity of the protected site cannot be conclusively ruled out. Their inclusion in the application is therefore a significant matter, reflecting the applicant's recognition of the sensitivity of the site and the potential for environmental harm.

Notably, the submission of these documents indicates that the applicant acknowledges the possibility that the Scottish Ministers may reach a different conclusion regarding the likelihood of adverse effects on the protected site's integrity. By proactively providing derogation and compensation proposals, the applicant intends to address such concerns should they arise during the determination process. This approach demonstrates a degree of responsibility in seeking to mitigate potential impacts on a designated conservation area, although it also underscores the inherent uncertainties associated with the assessment of such effects.

Mitigation, compensation proposals, and future monitoring, while important components of environmental management, do not in themselves satisfy the

stringent legal requirements for consent under the Habitats Regulations. Consent may only be lawfully granted where the competent authority has ascertained beyond reasonable scientific doubt that the proposed development will not adversely affect the integrity of the protected site. This high evidential standard places the burden of proof squarely on the applicant to demonstrate compliance. Unless the strict derogation tests are unequivocally met, no consent can be issued. This legal framework is reinforced by the provisions of GEN 9 and GEN 13 of the National Marine Plan and Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. Together, these policies and regulations establish a robust and precautionary approach to safeguarding protected habitats and species, ensuring that environmental integrity is upheld in planning decisions.

The applicant's submission falls short in demonstrating that the statutory tests designed to protect internationally important habitats and species are satisfied, as evidenced by their own derogation documents. These documents reveal a lack of sufficient certainty that the necessary legal criteria for permitting harm to protected ecological features can be met, thereby undermining the robustness of the mitigation measures proposed.

Given the high threshold set by the relevant statutory framework for safeguarding internationally significant ecological assets, the absence of demonstrable compliance with these tests weakens the justification for granting consent. Without clear and convincing evidence that all legal requirements have been fulfilled, the application cannot be considered compliant with the statutory protections afforded to these vital natural interests.

1.1.469 Public Engagement, Site Selection and Environmental Information

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

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

therefore imperative that the Scottish Ministers give careful consideration to these deficiencies when weighing the representations submitted, recognising that the opportunity for genuine participation has been compromised.

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

Moreover, the application frequently relies on future assessments, post-consent plans, monitoring programmes, and additional approvals to address outstanding issues. This approach conflicts with the requirements of the EIA Regulations, which mandate that likely significant effects must be fully understood prior to determination. The Scottish Ministers are required to make decisions based on the evidence before them at the time of determination, rather than on the assumption that unresolved matters will be satisfactorily addressed at a later stage. In this regard, the applicant has not demonstrated that the environmental information submitted is adequate to enable an informed decision.

1.1.470 Effects on Local Area

The applicant's environmental and heritage impact assessment notably underrepresents the direct and significant effects on the communities of Islay, Colonsay, and Oronsay. Islay and Colonsay are geographically the closest to the proposed development area, which extends immediately north-west of Islay and west of Colonsay across a substantial 448 square kilometre zone. However, the application primarily approaches Islay through the perspective of its potential as a direct project location rather than recognising and analysing it as an affected island community in its own right. In particular, the Atlantic-facing communities of Islay confront the nearest edge of this extensive development area, yet the assessment fails to provide a place-based evaluation of the consequent effects on their setting, local economy, or community life. This omission substantially undermines the reliability of the environmental impact evaluation, as it neglects the lived experience and socio-economic fabric of these vulnerable communities directly adjacent to the development.

For Colonsay and Oronsay, the situation is further accentuated by the fact that their seaward outlook—the very aspect that defines daily life and cultural identity—faces the development array directly. Colonsay's coastline includes the North Colonsay and Western Cliffs Special Protection Area, which is central to the applicant's derogation case and proposed compensation plan. This area is explicitly acknowledged as internationally protected due to its seabird populations, and the applicant concedes that harm to these populations cannot be ruled out. The presence of Oronsay Priory, a scheduled monument of national importance within this community, further intensifies the need for careful consideration. The heritage

assessment's identified gaps apply with full force to Oronsay Priory's open maritime setting, which is integral to its historical and cultural significance. Collectively, these inadequacies in the applicant's assessment—both environmental and heritage—demonstrate a fundamental underassessment of the effects on these islands, compromising the credibility and comprehensiveness of the impact evaluation presented.

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

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

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

The applicant's assessment recognises the Ross of Mull South coastal area as having High sensitivity at distances of approximately 22 to 24 kilometres and attributes a Medium magnitude of effect. Significant effects are accepted at Erraid and on the Core Paths of the Ross, with Fionnphort—serving as the gateway to Iona and the embarkation point for visitors—acknowledged as the community most directly impacted by visitor flows. Across Mull more broadly, significant effects are similarly recognised on Core Paths and within the Central, South and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, which encompasses Mull's western waters and islands, is classified as of High sensitivity throughout a range of approximately 21 to 33 kilometres, yet the applicant attributes no greater

than Medium magnitude of effect. The assessment's treatment of the Wilderness and Gribun Rocks coastal area, where viewing distances exceed 30 kilometres and the scale of change is judged small, exemplifies a reliance on distance-based reasoning that may understate the significance of impacts. Furthermore, the applicant does not provide place-based assessments for Mull's west-facing tourism economy, including wildlife boat operations and accommodation providers in western townships, all of which depend on the largely unspoilt Atlantic seascape that the development would industrialise. Taken together, these points suggest that the applicant's assessment inadequately addresses the significant visual, economic, and community impacts on Mull and Ross of Mull, particularly in relation to designated landscapes and tourism-dependent communities.

The applicant's assessment acknowledges the presence of several designated landscapes within the wider seaboard area, including the Loch na Keal National Scenic Area, which encompasses the islands of Ulva and Staffa, as well as the Jura and Scarba, Lunga and the Garvellachs National Scenic Areas. Ulva, a community-owned island situated within Loch na Keal, is highlighted as a small, re-establishing community whose regeneration relies heavily on the unspoilt seascape and natural setting. Notably, the applicant's assessment does not include any specific evaluation of the effects on Ulva, thereby omitting consideration of impacts on a vulnerable island community dependent on the very qualities at risk. Staffa, also within the Loch na Keal National Scenic Area and located approximately 35 kilometres from the proposed development, is recognised for its panoramic maritime qualities and status as one of Europe's most celebrated small islands. Despite this, the applicant concludes that the scale of change would be small and not significant, even though this lies beyond the 30-kilometre threshold NatureScot suggested for assessing impacts on National Scenic Area qualities.

The Jura National Scenic Area, characterised by its wild and undeveloped Atlantic outlook, is assessed by the applicant as having high sensitivity at a distance of approximately 28 to 32 kilometres from the development site. However, the magnitude of impact is rated only as medium to low, primarily justified by distance, apparent scale, and retention of landforms. A similar approach is applied to the Scarba, Lunga and the Garvellachs National Scenic Area, situated 35 to 40 kilometres away, receiving the same moderate treatment. This approach underestimates the potential significance of effects on these designated landscapes by placing disproportionate weight on distance and visual scale without fully accounting for the intrinsic qualities that underpin their designation. Consequently, the assessment fails to adequately protect the natural and cultural characteristics of these important seaboard landscapes and their associated island communities.

The applicant's assessment categorises the South Tiree coastal area as having High sensitivity at a distance of approximately 35 kilometres, yet attributes only a Low magnitude of change to the proposed development. This characterisation warrants further scrutiny. Tiree is an exceptionally low-lying island, with its landscape character fundamentally shaped by the dominance of sea and sky. Its highest elevation, Ben Hynish, reaches merely 141 metres above sea level. Given this context, the introduction of turbines up to 335 metres in height would represent vertical elements unprecedented within Tiree's open oceanic horizon. Such structures would inevitably alter the island's distinctive seascape character in a

manner far more substantial than the assessment acknowledges. Therefore, the conclusion of a Low magnitude of change for a receptor as exposed and sensitive as Tiree appears to significantly understate the true magnitude of impact, undermining the reliability of the overall evaluation.

While the applicant's assessment includes certain mitigation measures aimed at moderating the visual and economic impacts of the proposed development, these measures fall short in adequately addressing the effects experienced by mainland and island communities with direct seascape connections to the site. The reliance on distance-based moderation fails to capture the nuanced and significant influence the development would have on receptors such as Ardnamurchan Point, where panoramic views along the Hebridean seaboard contribute substantially to local tourism. The application's approach thus inadequately accounts for the high-quality seaward panoramas that are central to the visitor experience and economic vitality of the peninsula.

Moreover, the assessment omits a thorough examination of communities on the west coast of Kintyre, whose outlook, character, and visitor economy are intrinsically linked to the open Atlantic seaboard. These communities, alongside the Treshnish Isles and other small islands and mainland coasts facing towards the development, rely heavily on the visual and environmental integrity of these waters. The lack of consideration given to these receptors undermines the comprehensiveness of the assessment and risks overlooking cumulative impacts that may affect the sustainability of local economies and the preservation of community identity.

In addition, the omission of any evaluation of effects on Gigha, a community-owned island that stands as a national symbol of island regeneration, is particularly concerning. Gigha's eastern outlook towards the development area means that its finely balanced community and economy could be materially affected. The failure to include Gigha in the applicant's assessment represents a significant gap, limiting the understanding of the full range of consequences and thereby weakening the robustness of the environmental appraisal. Consequently, the assessment should be revisited to incorporate these critical receptors to ensure a more comprehensive and equitable evaluation of the proposed development's impacts.

The applicant's approach to assessing environmental effects employs a systematic moderation and discounting of impacts on sensitive receptors located beyond approximately 20 kilometres, resulting in a significant underestimation of those effects. Taken together, the evidence demonstrates a clear pattern: wherever a highly sensitive receptor lies beyond this threshold, the magnitude of change is artificially reduced and the resultant effect is correspondingly diminished. Crucially, this approach fails to provide any place-based assessment for the communities experiencing these impacts, effectively overlooking their exposure and the significance of the effects upon them. Such a methodology undermines the integrity of the environmental impact assessment by neglecting the genuine extent and severity of impacts beyond the 20-kilometre boundary.

1.1.471 Personal Observations

Finally, I would also ask the Scottish Ministers to consider: Don’t destroy what has always been one of the most important historical locations in the world for Christianity

1.1.472 Further Comments

Scotland has always defended its historical sights , location and its people they need you to do this again.

1.1.473 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy requirements governing its determination. Notably, the applicant’s own evaluations acknowledge considerable impacts on nationally designated landscapes, as well as on the local communities and heritage of the coastline. Independent examination of the applicant’s documents reveals that these impacts have been understated. Crucially, the necessary heritage assessment has not been conducted, and although the effects on island communities were identified, no corresponding evaluation has been undertaken. Furthermore, the ecological criteria required by relevant legislation have not been demonstrated as achievable. It is also pertinent that only a portion of the project is currently before the Scottish Ministers for consideration.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to withhold the associated marine licence. Should the Ministers consider it inappropriate to refuse outright, I request that they mandate the submission of additional environmental information and enhanced visualisations. Moreover, I advocate that the applications be determined only following a public inquiry, which would allow a thorough examination of the issues raised in this objection. Regardless of the final decision, I ask that the Ministers explicitly address the impacts on cultural heritage and the affected island communities within their stated reasons.

Yours faithfully,

[Redacted]

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

Member of the public 551
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, which are currently the subject of planning application 00012385 for consent under section 36 of the Electricity Act 1989, and application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications have been made by MachairWind Limited, operating under ScottishPower Renewables. I request that this correspondence be recorded as an official objection, that I be noted as an objector, and that I be informed of the determination made on these applications.

The proposed development envisages the installation of an offshore wind farm generating approximately 2 gigawatts of power. The project would consist of between 91 and 144 wind turbines, each with a maximum height of 335 metres to the tip of the blade. The site encompasses a Windfarm Development Area covering around 448 square kilometres of marine space located northwest of Islay and to the west of Colonsay. This area lies approximately 21 kilometres from Iona and is situated in close proximity to various islands and coastal communities within the southern Hebrides.

This objection is grounded in the planning and environmental considerations relevant to the statutory and policy framework governing these applications. It is important to emphasise that the onus lies with the applicant to provide robust and adequate evidence demonstrating compliance with all applicable tests and requirements. The role of objectors is not to disprove, but rather to highlight where the applicant has failed to meet its evidential burden. Having carefully examined the submissions and supporting documentation, it is clear that the applicant has not sufficiently discharged this responsibility. Consequently, I assert that consent for the MachairWind Offshore Wind Farm should be refused.

1.1.474 Legislative and Policy Framework

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

Furthermore, the Scottish Ministers, in their determination of the application, are required to have regard to the same statutory duties. The evidence explicitly states that where compliance has not been demonstrated, or where deficiencies, omissions, or conflicts with the applicable legal and policy framework are identified,

these matters weigh against the granting of consent. Given the clear deficiencies and omissions in addressing the statutory duties under Schedule 9, the application cannot be considered to meet the legal threshold for approval. The failure to properly address these statutory obligations constitutes a significant procedural and substantive defect that must result in the refusal of consent.

The marine licence application under Part 4 of the Marine (Scotland) Act 2010 fails to demonstrate compliance with the statutory requirements of Scotland's National Marine Plan, specifically the General Policies GEN 4, GEN 6, GEN 7, GEN 9, GEN 13, GEN 18, GEN 19, and GEN 21, along with their associated paragraphs addressing co-existence, historic environment, landscape and national scenic areas, natural heritage, engagement, sound evidence, and cumulative impacts. The application lacks sufficient evidence to confirm adherence to these policies, which are integral to the statutory assessment process. This absence of demonstrated compliance constitutes a fundamental deficiency in the application's statutory and policy framework.

Given that compliance with the National Marine Plan policies has not been established, and the evidence reveals omissions and conflicts with the applicable legal and policy requirements, these shortcomings must weigh decisively against the granting of consent. The application's failure to meet the necessary statutory standards and policy obligations under the Marine (Scotland) Act 2010 and the National Marine Plan renders the proposal unacceptable in its current form and justifies refusal of the marine licence.

The proposal fails to demonstrate compliance with the mitigation requirements set out in National Planning Framework 4, specifically in relation to Policies 3, 4, 7, and 11. These policies address biodiversity, natural places, historic assets, and energy, respectively, and are critical to ensuring that development does not adversely affect these key environmental and cultural resources. The application lacks sufficient evidence to show that the necessary measures to protect and enhance biodiversity and natural places have been adequately incorporated. Similarly, there is no clear demonstration that the historic assets and places impacted by the proposal have been properly considered or safeguarded in accordance with Policy 7. Furthermore, the energy strategy fails to meet the standards required by Policy 11, undermining the framework's objectives for sustainable energy use.

National Planning Framework 4 is a significant material consideration that must be applied alongside statutory duties and legislative requirements. The absence of demonstrated compliance, coupled with identified deficiencies and omissions in the submitted evidence, constitutes a direct conflict with the applicable legal and policy framework. As established in the framework, where such conflicts and failures exist, they weigh decisively against the granting of consent. Therefore, the proposal's failure to meet these essential policy requirements necessitates refusal in accordance with the statutory and policy context governing this application.

The proposal fails to meet the fundamental legal requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations, which mandate that the likely significant environmental effects of any development must be thoroughly identified,

assessed, and reported prior to determination. This statutory obligation ensures that decision-makers are fully informed of potential environmental impacts, enabling them to consider these effects appropriately in the planning process.

Furthermore, the proposal does not comply with the Habitats Regulations, which require a rigorous assessment of the effects on European protected sites in accordance with the applicable statutory tests. This assessment is critical to safeguard protected habitats and species from adverse impacts arising from development. The absence of a demonstrably adequate Habitats Regulations Assessment undermines the statutory protection afforded to these sites.

The evidence clearly indicates that compliance with these legal requirements has not been demonstrated. There are significant deficiencies and omissions in the environmental impact assessment and the habitats regulations assessment submitted in support of the proposal. These shortcomings represent a direct conflict with the applicable legal and policy framework governing environmental protection and planning consent.

In light of these failures, the proposal does not satisfy the mandatory procedural and substantive requirements necessary for lawful determination. Consequently, these unresolved deficiencies weigh decisively against the granting of consent.

The proposal fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be considered and given due weight in the decision-making process. There is no evidence within the application or supporting documentation that properly addresses or weighs these interests, resulting in a clear omission in the assessment. This failure to engage with the statutory duty under the Act represents a significant procedural and substantive deficiency.

Given that the evidence identifies this omission and a conflict with the applicable legal and policy framework, the proposal cannot be regarded as meeting the necessary statutory tests. As established by the Islands (Scotland) Act 2018 and confirmed in the approved evidence, where compliance has not been demonstrated, such deficiencies weigh decisively against the granting of consent. Therefore, the application should be refused on the basis that it does not properly consider or give due weight to the interests of island communities as required by law.

The applicant has failed to discharge the fundamental responsibility of demonstrating compliance with all relevant legal and policy requirements. It is an established principle that the onus lies with the applicant to provide robust, objective, and proportionate evidence confirming that every applicable statutory duty, planning policy, and environmental assessment obligation has been fully satisfied. In this case, the submitted evidence does not meet this evidential burden.

Specifically, the application lacks sufficient demonstration that all statutory duties have been addressed, and there are clear deficiencies and omissions within the supporting documentation. These shortcomings result in unresolved conflicts with the applicable legal and policy framework. Such failures are material and significant,

as the absence of conclusive evidence confirming compliance undermines the legitimacy of the application.

Given these evidential deficiencies and the applicant's failure to meet the required standard of proof, the proposal cannot be considered compliant with the statutory and policy framework governing the development. Consequently, these unresolved matters must weigh decisively against the granting of planning consent.

1.1.475 Conflict with National Planning Framework 4 and the Development Plan

NPF4 Policy 11 endorses renewable energy development, yet this endorsement is contingent upon adherence to specific impact criteria within the policy itself. These include Policy 11(c), which addresses impacts on communities, and Policies 11(d) and 11(e), which concern impacts on landscape, seascape, and other receptors. The policy's support is therefore conditional and does not override these critical considerations.

In applying these criteria to the proposal, it becomes evident that compliance has not been demonstrated. The proposal would result in significant adverse effects on nationally designated landscapes and seascapes. Furthermore, there is a lack of evidence to confirm that the cultural significance of scheduled monuments and their settings would be protected, or that island communities would be adequately safeguarded. Additionally, the ecological assessments required have not been shown to meet necessary standards based on the submitted evidence. Consequently, the proposal conflicts with the impact criteria set out in NPF4 Policy 11, undermining the policy's support for renewable energy development in this instance.

The proposal would result in significant adverse effects on nationally designated landscapes and seascapes, undermining the qualities for which these areas have been protected. This practical consequence is directly at odds with the safeguards enshrined in National Planning Framework 4 (NPF4), specifically Policy 11 in conjunction with Policies 4(c) and 4(d), which collectively aim to preserve the intrinsic value of National Scenic Areas and nationally important landscapes.

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

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

The proposal conflicts with the terrestrial development plan framework, including the Argyll and Bute Local Development Plan 2, resulting in adverse effects on the landscape, heritage, and community interests that these policies are designed to protect. This inconsistency undermines the objectives of the development plan, which seeks to safeguard these key local attributes. Furthermore, the proposal is not only at odds with the local development plan but also fails to align with the broader strategic aims set out in National Planning Framework 4. The applicant has not provided evidence to demonstrate that these conflicts can be mitigated or justified. Consequently, the proposal is fundamentally incompatible with the relevant terrestrial development plan policies.

1.1.476 Seascape, Landscape and Visual Effects

The applicant's written methodology, as set out in Appendix 16.1, notably lacks any specified distance threshold beyond which major effects cease. Nevertheless, an independently prepared Evidence Note, which draws entirely upon the applicant's own Chapter 16 and Appendices 16.1 to 16.3, reveals a clear and consistent pattern across all three streams of assessment. This pattern demonstrates that no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of the receptor's sensitivity or the extent of visibility. Furthermore, the applicant's own documentation explicitly acknowledges the influence of distance on effect judgements. For example, the assessment of a coastal area situated over 30 kilometres from the site concludes that, given the viewing distance, the scale of change is considered small. Similarly, the Landscape Character synthesis categorises magnitude as High within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types.

This reliance on distance as a moderating factor in the assessment has significant implications for the reliability of the conclusions drawn. By systematically reducing the magnitude of effects at the very distances where the most sensitive designated landscapes are located, the inputs to the protective tests are effectively understated. As a result, the final assessments presented do not provide a dependable description of the likely effects that the Scottish Ministers are being asked to consent to. Such an approach risks underrepresenting the true impact on sensitive receptors and consequently undermines the robustness of the decision-making process.

While mitigation measures are often informed by visual assessments, it is important to recognise the inherent limitations of the visualisation materials employed. The applicant's adherence to NatureScot's visualisation guidance ensures a standardised approach; however, this guidance explicitly acknowledges that printed visualisations cannot fully replicate the scale or immersive experience perceived by a viewer in the field. Consequently, reliance on these materials may understate or distort the actual visual impact of a development.

Furthermore, the wireline drawings included alongside photographic panoramas are not independent tools that correct or enhance the photographic evidence; rather, they are technical renderings subject to the same perceptual constraints as the photographs they accompany. This means that both forms of visualisation share inherent limitations and should be interpreted cautiously when assessing the true

visual effects. Given these constraints, decision-makers should consider the potential discrepancies between visualisation materials and real-world perception when evaluating the visual impact of the proposal.

The applicant's evidence acknowledges that the proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, thereby permanently altering the character of the night-time seascape throughout the stated 35-year operational life. This change represents a significant visual impact, as the introduction of such lighting would be a novel and enduring feature in an area previously characterised by natural darkness.

It is important to note that, in policy terms, the 35-year operational life does not limit the potential harm to the seascape. The decision to consent to this development effectively constitutes a decision that this particular seascape is considered appropriate for wind farm use, with the attendant acceptance of changes to its character. This policy implication underscores the need for careful consideration of the balance between development benefits and the preservation of seascape qualities.

Given these factors, the impact of the lighting on the night-time seascape character requires thorough assessment within the planning process. While the operational timeframe may be finite, the policy consequences of consenting to such an alteration are enduring, necessitating a measured approach that weighs the permanent visual effects against the broader objectives of sustainable development.

While the applicant acknowledges certain effects on landscape and seascape interests, it has failed to demonstrate that these effects have been adequately mitigated in accordance with relevant policy requirements. Specifically, these effects engage National Planning Framework 4 (NPF4) Policies 4(c) and 4(d), 11(d) and 11(e), alongside Policy GEN 7 and paragraph 4.28 of the National Marine Plan. Despite this, the applicant has not shown that its conclusions regarding the scale of these accepted effects align with its own stated methodology. Consequently, compliance with policies designed to protect nationally important landscapes and seascapes remains unproven, undermining the proposal's conformity with the established planning framework.

1.1.477 Cultural Landscape, Archaeology and Historic Environment

The practical consequence of the applicant's failure to properly apply the recognised methodology for assessing effects on the setting of historic assets is that the reliability of their conclusions regarding heritage impacts is fundamentally undermined. Although the applicant claims to have followed Historic Environment Scotland's established approach, which emphasises evaluating how changes to setting affect the contribution that setting makes to an asset's cultural significance and whether the integrity of that setting is adequately retained, their assessment falls short of these requirements. Notably, the methodology explicitly advises against equating visual change directly with adverse impact, yet the applicant's report does not adequately demonstrate this critical distinction.

A detailed Methodological Audit, prepared independently in support of community objections and based solely on the applicant's Appendix 14.3, highlights that while the operational assessment identifies relevant heritage attributes, it fails to show how the integrity of setting has been assessed in accordance with the applicant's own accepted methodology. Instead, the assessment largely focuses on describing visual change—considering factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—before concluding that the integrity of setting remains intact. This approach omits the essential evaluative step required by the methodology, as none of the worked examples examined in the Audit demonstrate how the integrity of setting has been critically appraised beyond mere visual description.

In light of this, the applicant's assessment cannot be relied upon to provide a robust or methodologically sound evaluation of heritage impacts. The absence of a transparent and rigorous assessment of setting integrity calls into question the validity of the conclusions drawn and undermines confidence in the planning decision-making process. It is therefore essential that any determination of this application takes into account the methodological deficiencies identified and requires a reassessment that fully complies with the established Historic Environment Scotland methodology.

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

The heritage impact conclusions presented rely significantly on the findings of the landscape assessment. According to the evidence, any understatement of landscape effects directly influences and diminishes the accuracy of the heritage conclusions that are derived from them. This interdependence suggests that if the landscape assessment fails to fully capture the extent or significance of the effects, the subsequent evaluation of heritage impacts will inevitably reflect that same understatement.

This reliance raises concerns about the overall credibility of the heritage conclusions. By building upon an assessment that potentially downplays landscape effects, the

heritage analysis may not adequately account for the full scope of impacts, thereby undermining its robustness. It is therefore essential that the landscape assessment be thorough and accurate, as deficiencies in this area compromise the validity of the heritage impact conclusions that depend upon it.

The application fails to demonstrate adequate mitigation measures to protect heritage assets, falling short of the requirements set out in relevant policy. This matter engages NPF4 Policy 7(h) concerning scheduled monuments, alongside Policies 7(c) and 7(d) which address the setting of such assets, as well as GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Crucially, the applicant has not provided evidence that the cultural significance of internationally and nationally important heritage assets and their settings will be safeguarded. Consequently, the Scottish Ministers lack the necessary assessment to conclude that these heritage interests would be properly protected. This absence of demonstrable compliance with key heritage protection policies undermines the acceptability of the application.

1.1.478 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development rely to an exceptional degree on visitors, who are drawn specifically by the qualities identified in the applicant's own baseline assessments: landscape, seascape, cultural heritage, tranquillity and remoteness. These attributes form the fundamental appeal that sustains visitor numbers and underpin the local economy.

Any alteration to these defining characteristics would directly undermine the economic foundation of these communities. Such an impact would inevitably extend beyond immediate economic effects, threatening local services, reducing population stability, and ultimately jeopardising the long-term viability of the island settlements. Consequently, the proposal poses a significant risk to the fundamental economic and social sustainability of these island communities.

The practical consequence of the applicant's approach is a significant gap in understanding and mitigating the impacts of the proposal on island communities. Although the applicant's own consultants identified habitability as a potentially significant pathway for effects on these communities, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment conducted in Chapter 18 focuses primarily on regional port communities, leaving the island communities facing the development without an equivalent, place-based evaluation. Despite this omission, the assessment nonetheless concludes that these island communities are of low sensitivity to tourism effects, a conclusion that does not reflect the realities on the ground.

This generalised conclusion overlooks the particular nature of small island economies, which are not comparable to regional averages. These economies are often heavily concentrated in sectors directly dependent on the qualities that attract visitors, making them inherently more vulnerable to changes affecting tourism. Moreover, an increasing reliance on visitor numbers tends to deepen rather than reduce this sensitivity, as it intensifies dependence on those at-risk qualities. Therefore, the assertion of low sensitivity, reached without detailed, place-specific analysis, lacks evidential foundation and amounts to an unwarranted assumption.

Without a robust, island-focused socio-economic assessment, the proposal risks underestimating the true impacts on these vulnerable communities.

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

In this context, the applicant has not demonstrated that the proposal is compatible with the sustainability of island communities, nor has it evidenced compliance with the statutory duties owed to these populations. The failure to undertake the necessary socio-economic assessment and to engage meaningfully with island stakeholders undermines the soundness of the proposal under the relevant planning policies and statutory instruments. Consequently, the proposal falls short of the required standards for assessing and protecting island communities, warranting refusal on the basis of non-compliance with established policy and statutory duties.

1.1.479 Ecology, Biodiversity and Habitats Regulations

The proposed development would bring extensive construction, operational, and decommissioning activities into an ecologically sensitive environment for a prolonged period of decades. Priority Marine Features and Annex I habitats are present within the development site itself, while the surrounding waters provide habitat for seabirds, marine mammals, and basking sharks. This concentration of protected species and habitats underlines the ecological importance of the area and indicates a high potential for significant adverse environmental effects resulting from the scale and duration of the proposed works. Given these considerations, the potential for ecological harm must be carefully weighed against the benefits of the development.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan focused specifically on the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are typically prepared for circumstances where an adverse effect on the integrity of a protected site cannot be ruled out. Their inclusion in the application is therefore a material consideration, signalling the applicant's acknowledgement of potential impacts.

Importantly, the applicant's approach concedes that Scottish Ministers may reach a different conclusion regarding adverse effects on the protected site's integrity. This recognition underscores that the submitted derogation and compensation documents are intended to address and mitigate potential impacts in accordance with relevant provisions, rather than to pre-empt regulatory assessment. As such, these

documents form a critical component of the application's approach to compliance with protection requirements.

The practical consequence of the stringent legal and policy framework under the Habitats Regulations is that planning consent for developments affecting protected habitats and species can only be granted when it is clearly demonstrated that the proposal will not adversely affect the integrity of the protected site. This requirement imposes a high evidential standard: no reasonable scientific doubt can remain regarding the absence of adverse effects. It is not sufficient for an applicant to rely solely on mitigation, compensation proposals, or commitments to future monitoring as these do not, by themselves, satisfy the statutory tests necessary to lawfully grant consent.

This legal framework is reinforced by relevant policy provisions, including GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). Together, these provisions ensure that developments are subject to rigorous assessment and that consent decisions are made only when the strict derogation tests are conclusively met. Consequently, the burden of proof lies firmly with the applicant to provide robust, scientific evidence that the proposed development will not compromise the protected habitat's integrity before any consent can be lawfully granted.

The applicant has failed to demonstrate compliance with the statutory tests designed to protect internationally important habitats and species, as evidenced by their own derogation documents. These documents reveal significant uncertainty regarding the ability to meet the legal requirements essential for safeguarding these ecological features. Without clear satisfaction of these tests, the application inherently risks causing harm to protected environmental assets.

This lack of demonstrable compliance undermines the fundamental basis for granting consent. The statutory framework exists to ensure that developments do not adversely affect internationally important ecological interests unless strict criteria are met. The evidence before the decision-maker does not provide the necessary assurance that these criteria have been fulfilled, meaning the application falls short of the legal standards required for approval.

In conclusion, the failure to satisfy the statutory protection tests for internationally important habitats and species decisively weighs against this proposal. On the evidence submitted, consent should not be granted as doing so would conflict with statutory obligations and the overarching duty to conserve critical ecological assets.

1.1.480 Cumulative and In-Combination Effects

The current assessment approach submitted to the Scottish Ministers is fundamentally flawed, as only a portion of the overall project—the wind farm itself—is under consideration. Crucially, the export cable corridor and onshore transmission works, which are indispensable for the wind farm's operation, have been deferred to separate future applications. This fragmentation means that the environmental and cumulative effects of the entire project are never evaluated in a single, comprehensive process. Instead, significant components are subject to subsequent

consenting procedures following the principal decision, thereby undermining a holistic understanding of the project's impacts.

Such an approach conflicts with established legal principles, as underscored by the courts in Raeshaw Farms, which mandate that a project must be assessed in its entirety rather than being artificially segmented into parts whose individual effects may seem less significant. By salami-slicing the project, the assessment fails to capture the full scope of potential environmental and social consequences, rendering the decision-making process incomplete and procedurally unsound. Consequently, this piecemeal evaluation is contrary to both legal precedent and sound planning practice, and should be reconsidered to ensure a thorough and integrated assessment of all project elements.

The practical consequence of relying on the current cumulative impact assessment is a significant underestimation of the true combined effects of the proposed development alongside existing, consented, and foreseeable projects. This arises because the cumulative assessments are fundamentally dependent on the conclusions drawn in the broader Environmental Impact Assessment. Specifically, where the baseline assessments for landscape, heritage, and socio-economic factors have understated the severity of impacts—as previously demonstrated—the cumulative assessment inherits these understated effects. As a result, the baseline from which cumulative impacts are measured is artificially reduced, leading to a cumulative impact appraisal that fails to reflect the real magnitude of combined effects. Consequently, the cumulative impact assessment cannot be regarded as reliable or comprehensive in its current form.

The failure to adequately consider the cumulative and in-combination effects of the proposal, including deferred works, compromises compliance with key planning policies and environmental regulations. Specifically, the requirements of GEN 21 and paragraph 4.85 of the National Marine Plan, alongside NPF4 Policy 11(e) and the EIA Regulations concerning project splitting, have not been met. The applicant has not reliably identified or assessed the overall impacts of the project as a whole. It is therefore essential that the decision-making process explicitly addresses the treatment of deferred works to ensure full regulatory compliance and informed assessment.

1.1.481 Public Engagement, Site Selection and Environmental Information

The applicant requests that Scottish Ministers place significant weight on the site-selection process, thereby rendering the quality of public participation in that process directly relevant. However, deficiencies in public involvement at both the plan and site-selection stages have persisted into the application phase. The application itself comprises many thousands of pages of technical material, yet the consultation period coincided with the busiest months for island communities, when residents are engaged continuously throughout the visitor season and specialist advice is least accessible. In contrast, the applicant has had years and substantial professional and financial resources to prepare its case.

GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, mandates that those affected by

decisions of this magnitude must have a realistic opportunity to participate. The conditions under which the affected communities have been required to respond do not meet this standard. It is therefore essential that Ministers take this shortfall firmly into account when considering the representations made, as the legitimacy of the site-selection process is undermined by these deficiencies in consultation timing and public participation.

The Environmental Impact Assessment forms the essential evidential foundation for the Scottish Ministers' decision-making on this application. However, significant deficiencies undermine its sufficiency. Across several critical topics, the assessment identifies potential pathways to significant effects but fails either to investigate them thoroughly or to apply appropriate methodologies. For instance, the landscape assessment's conclusions rely on a distance-based pattern absent from its own stated methodology; the heritage assessment does not adequately apply its declared integrity test; and the socio-economic assessment omits any place-based analysis of the affected islands.

Moreover, the application frequently depends on future assessments, post-consent plans, monitoring schemes, and subsequent approvals to address unresolved issues. This approach conflicts with the requirements of the Environmental Impact Assessment Regulations, which mandate that likely significant effects be comprehensively understood prior to determination. Reliance on uncertain future measures cannot substitute for robust, complete information at this decisive stage.

In conclusion, the Scottish Ministers must base their determination on the evidence currently before them, not on assumptions that outstanding matters will be satisfactorily resolved after consent. The applicant has not demonstrated that the environmental information submitted meets the standard of adequacy necessary for an informed decision. Consequently, the assessment as presented is insufficient to support approval.

1.1.482 Effects on Local Area

The applicant's assessment significantly underestimates the direct and substantial effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby undermining the reliability of the overall environmental and heritage impact evaluation. Islay and Colonsay, being the closest inhabited islands to the proposed development area—which lies immediately north-west of Islay and west of Colonsay—receive an assessment that is fundamentally flawed. The application primarily considers Islay only in terms of its potential as a direct project location, rather than recognising it as an affected island community with distinct social and economic characteristics. Notably, the Atlantic-facing communities of Islay confront the nearest edge of a 448 square kilometre development zone, yet there is no place-based analysis of how this proximity would influence their setting, economy, or community life.

The situation is equally concerning for Colonsay and Oronsay, where the seaward outlook integral to daily life directly faces the proposed array. The North Colonsay and Western Cliffs Special Protection Area, which constitutes Colonsay's coastline, is central to the applicant's derogation case and compensation strategy. This

acknowledgement implicitly concedes that harm to the internationally protected seabird population of these cliffs cannot be ruled out. Moreover, Oronsay Priory, a scheduled monument of national importance, lies within this community's sphere, yet the significant deficiencies identified in the heritage assessment regarding the treatment of open maritime settings are fully applicable here. Taken together, these points demonstrate that the applicant's evaluation fails to adequately address the scale and nature of impacts on these island communities and their heritage assets.

The applicant's assessment significantly underestimates the scale and significance of visual and community impacts on Iona, leading to an incomplete understanding of the environmental and social consequences. The Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity, with direct orientation towards the proposed development, extensive visibility, and a large geographical extent of change. The turbines would be visible from approximately 21 kilometres away, spanning around 39 degrees of the horizon, thereby affecting the ferry crossing between Fionnphort and Iona. Similarly, the West Coast of Iona is acknowledged as highly sensitive with widespread visibility, and the applicant concedes that significant effects would be experienced by residents and visitors across much of the island, including at Dùn Ì, its highest point. Despite this recognition, the assessment omits a comprehensive evaluation of habitability impacts on the local community, a pathway identified by the applicant's own consultants, even though a household consultation revealed that 92 per cent of respondents on Iona object to the proposal.

Moreover, the proposal's impact on Iona's internationally important monastic landscape is inadequately addressed. The applicant's baseline recognises the significance of pilgrimage, arrival by sea, and movement through the landscape as critical to the heritage value of sites such as the Abbey, the Nunnery, and the high crosses. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet no visualisation has been provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, a key vantage point. To contextualise the scale of visual impact, the largest turbines would exceed the height of Ben Hynish on Tiree—a familiar landmark standing at 141 metres and visible from Iona at approximately 33 kilometres—by around 194 metres, despite being viewed from roughly two-thirds of that distance. This comparison further emphasises that the applicant's assessment fails to fully capture the extent and significance of the visual and heritage effects on Iona, thereby compromising the accuracy of the overall environmental and social impact evaluation.

The applicant's assessment acknowledges significant effects on several key areas of Mull and Ross of Mull, including the Ross of Mull South coastal area, which is identified as having High sensitivity at distances of approximately 22 to 24 kilometres and is attributed a Medium magnitude of impact. Notably, significant effects are accepted at Erraid and on the Core Paths of the Ross, as well as at Fionnphort—the critical gateway to Iona and the embarkation point for visitors—where the community's experience is recognised as being significantly affected due to its direct connection to visitor flows.

Across Mull more broadly, the applicant concedes significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Areas. The Loch na

Keal National Scenic Area, encompassing the western waters and islands of Mull, is assessed as having High sensitivity throughout a range of approximately 21 to 33 kilometres, yet the magnitude of impact attributed does not exceed Medium. This raises concerns regarding the adequacy of the assessment in capturing the true extent of effects within these designated landscapes.

Further, the approach taken to areas such as the Wilderness and Gribun Rocks coastal area—where the applicant reasons that the scale of change is small due to viewing distances exceeding 30 kilometres—exemplifies a reliance on distance-based criteria that may understate potential impacts. Crucially, the west-facing tourism economy of Mull, along with its wildlife boat operations and accommodation in western townships, depend heavily on the Atlantic seascape, which the proposed development would industrialise. Despite this, none of these communities have been the subject of a place-based assessment, leaving a significant gap in understanding and addressing the localised economic and community effects.

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

Further concerns arise regarding other significant islands within the same National Scenic Area. Staffa, one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development site—beyond the 30 kilometre limit to which NatureScot recommended assessing effects on National Scenic Area qualities. The applicant concludes that any changes at Staffa would be small and not significant, a judgment that appears inconsistent with their own acceptance of the island's panoramic maritime qualities. Similarly, the Jura National Scenic Area, recognised for its wild and undeveloped Atlantic character, is assessed as having only Medium to Low magnitude effects despite its High sensitivity and proximity of 28 to 32 kilometres. This moderation is attributed to distance and retained landforms, yet it fails to adequately reflect the intrinsic value of Jura's outlook that underpins its designation.

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

The applicant's assessment concludes a Low magnitude of change on the South Tiree coastal area despite recognising its High sensitivity at approximately 35 kilometres distance. This practical conclusion severely understates the true extent of the impact on Tiree's landscape, resulting in an unreliable evaluation that could misinform decision-making and undermine effective mitigation.

Tiree's landscape character is exceptionally distinctive, defined by its low-lying terrain and the dominance of sea and sky. The island's highest point, Ben Hynish, rises to just 141 metres, reinforcing an open oceanic horizon free from vertical intrusions. Introducing turbines reaching up to 335 metres would represent a dramatic departure from this established seascape character, creating unprecedented vertical structures that would be highly conspicuous and discordant.

Given the fundamental role that openness and horizontality play in defining Tiree's landscape, the applicant's Low magnitude conclusion for such an exposed and sensitive receptor is fundamentally flawed. It significantly understates the magnitude of change and impact, thereby compromising the reliability of the assessment and the planning process that depends upon it.

The applicant's assessment fails to consider the significant effects on several mainland and island communities that have direct views of, and economic reliance upon, the seascape where the development is proposed. This omission has practical consequences for the accuracy and completeness of the environmental evaluation, as these communities represent key receptors whose social and economic well-being is closely intertwined with the quality and character of the surrounding marine environment. Without their inclusion, the assessment cannot be regarded as comprehensive or fully informed.

Among the communities overlooked is Gigha, a community-owned island of national significance due to its residents' purchase, which symbolises island regeneration. Gigha faces the development site from the east, yet the effects on its finely balanced community and economy have not been examined. This is a notable omission given the island's unique status and the potential sensitivity of its social and economic fabric to changes in seascape character. Similarly, Ardnamurchan Point—the most westerly point of the British mainland—commands panoramic views along the Hebridean seaboard that attract visitors to the peninsula. These seaward panoramas are precisely the receptors to which the applicant's distance-based moderation approach should apply, but it has been disregarded.

Further, the west coast of Kintyre comprises a chain of communities whose outlook, character and visitor economy are defined by the open Atlantic seaboard looking towards Islay, Jura, and the wider waters beyond. The Treshnish Isles and other small islands and mainland coasts with views towards the development area share this position. The failure to assess impacts on these interconnected communities undermines the robustness of the environmental appraisal and risks neglecting the socio-economic repercussions of the proposal. It is essential that the assessment be revisited to address these gaps, ensuring all relevant receptors are properly considered.

The applicant’s approach to mitigation systematically diminishes the significance of effects on sensitive receptors located beyond 20 kilometres by moderating the magnitude of change and discounting the resulting impacts. This methodology effectively undermines the environmental impact assessment’s integrity, as it fails to provide any place-based evaluation for the communities experiencing these effects. Taken together, the evidence demonstrates that wherever a highly sensitive receptor lies beyond this 20-kilometre threshold, the assessment’s reductionist treatment leads to an absence of meaningful analysis for those affected populations. Consequently, the applicant’s distance-based approach results in an incomplete and potentially misleading understanding of the environmental consequences, warranting reconsideration to ensure all significant effects are appropriately recognised and addressed.

1.1.483 Personal Observations

In addition to the planning matters above, I am personally concerned because: This proposal significantly changes, and in fact destroys, the remote, peaceful, restorative island experience. Along with marine and bird life that will be affected, so will the mental health of all those who live on Iona and other islands, as well as those who come seeking solace for the soul.

Based on my own local knowledge, I also wish to highlight that: We have already seen more vulnerable whales and dolphins in recent years, washing up on beaches. Their habitat should be protected, not invaded. Birdlife will be affected from migration paths and the marine life severely disrupted. This is not something that should be destroyed for the financial gain of others.

Finally, I would also ask the Scottish Ministers to consider: The scale of this proposal is obscene. There must be other more sustainable options considered.

1.1.484 Further Comments

To read Richard Powers' book Playground considers many of the things affecting this proposal, with one exception. The strong reaction against this proposal from the island communities suggests no benefit to the communities who are forced to pay the price. To ignore the needs of wildlife and the human soul, is to take our society further into dissolution of care for the environment and each other.

1.1.485 Summary

This proposal fails to satisfy the statutory and policy requirements governing its determination. The applicant’s own evaluation acknowledges significant adverse impacts on nationally designated landscapes, as well as on the heritage and communities along this coastline. However, published analyses of the applicant’s documentation reveal that these effects have been understated. Notably, the necessary heritage assessment has not been conducted. Furthermore, while the effects on the island communities affected by the development were identified, no assessment of these impacts has been undertaken. The ecological tests required to meet statutory obligations have not been demonstrated as achievable. Compounding

these issues, only a portion of the project is currently submitted for consideration by the Scottish Ministers.

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

Should the Ministers decide against refusal, it is requested that they require the submission of further environmental information alongside enhanced visualisations. The applications should then be determined only following a public inquiry, providing a forum where the concerns raised in this objection can be thoroughly scrutinised. Moreover, it is sought that, irrespective of the outcome, the Ministers explicitly address and include in their decision the effects on cultural heritage and the impacted island communities.

Yours faithfully,

[Redacted]

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

Member of the public 552
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, which are currently the subject of planning application 00012385 for consent under section 36 of the Electricity Act 1989, and application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications have been made by MachairWind Limited, operating under ScottishPower Renewables. I request that this correspondence be recorded as an official objection, that I be noted as an objector, and that I be informed of the determination made on these applications.

The proposed development envisages the installation of an offshore wind farm generating approximately 2 gigawatts of power. The project would consist of between 91 and 144 wind turbines, each with a maximum height of 335 metres to the tip of the blade. The site encompasses a Windfarm Development Area covering around 448 square kilometres of marine space located northwest of Islay and to the west of Colonsay. This area lies approximately 21 kilometres from Iona and is situated in close proximity to various islands and coastal communities within the southern Hebrides.

This objection is grounded in the planning and environmental considerations relevant to the statutory and policy framework governing these applications. It is important to emphasise that the onus lies with the applicant to provide robust and adequate evidence demonstrating compliance with all applicable tests and requirements. The role of objectors is not to disprove, but rather to highlight where the applicant has failed to meet its evidential burden. Having carefully examined the submissions and supporting documentation, it is clear that the applicant has not sufficiently discharged this responsibility. Consequently, I assert that consent for the MachairWind Offshore Wind Farm should be refused.

1.1.486 Legislative and Policy Framework

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

Furthermore, the Scottish Ministers, in their determination of the application, are required to have regard to the same statutory duties. The evidence explicitly states that where compliance has not been demonstrated, or where deficiencies, omissions, or conflicts with the applicable legal and policy framework are identified,

these matters weigh against the granting of consent. Given the clear deficiencies and omissions in addressing the statutory duties under Schedule 9, the application cannot be considered to meet the legal threshold for approval. The failure to properly address these statutory obligations constitutes a significant procedural and substantive defect that must result in the refusal of consent.

The marine licence application under Part 4 of the Marine (Scotland) Act 2010 fails to demonstrate compliance with the statutory requirements of Scotland's National Marine Plan, specifically the General Policies GEN 4, GEN 6, GEN 7, GEN 9, GEN 13, GEN 18, GEN 19, and GEN 21, along with their associated paragraphs addressing co-existence, historic environment, landscape and national scenic areas, natural heritage, engagement, sound evidence, and cumulative impacts. The application lacks sufficient evidence to confirm adherence to these policies, which are integral to the statutory assessment process. This absence of demonstrated compliance constitutes a fundamental deficiency in the application's statutory and policy framework.

Given that compliance with the National Marine Plan policies has not been established, and the evidence reveals omissions and conflicts with the applicable legal and policy requirements, these shortcomings must weigh decisively against the granting of consent. The application's failure to meet the necessary statutory standards and policy obligations under the Marine (Scotland) Act 2010 and the National Marine Plan renders the proposal unacceptable in its current form and justifies refusal of the marine licence.

The proposal fails to demonstrate compliance with the mitigation requirements set out in National Planning Framework 4, specifically in relation to Policies 3, 4, 7, and 11. These policies address biodiversity, natural places, historic assets, and energy, respectively, and are critical to ensuring that development does not adversely affect these key environmental and cultural resources. The application lacks sufficient evidence to show that the necessary measures to protect and enhance biodiversity and natural places have been adequately incorporated. Similarly, there is no clear demonstration that the historic assets and places impacted by the proposal have been properly considered or safeguarded in accordance with Policy 7. Furthermore, the energy strategy fails to meet the standards required by Policy 11, undermining the framework's objectives for sustainable energy use.

National Planning Framework 4 is a significant material consideration that must be applied alongside statutory duties and legislative requirements. The absence of demonstrated compliance, coupled with identified deficiencies and omissions in the submitted evidence, constitutes a direct conflict with the applicable legal and policy framework. As established in the framework, where such conflicts and failures exist, they weigh decisively against the granting of consent. Therefore, the proposal's failure to meet these essential policy requirements necessitates refusal in accordance with the statutory and policy context governing this application.

The proposal fails to meet the fundamental legal requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations, which mandate that the likely significant environmental effects of any development must be thoroughly identified,

assessed, and reported prior to determination. This statutory obligation ensures that decision-makers are fully informed of potential environmental impacts, enabling them to consider these effects appropriately in the planning process.

Furthermore, the proposal does not comply with the Habitats Regulations, which require a rigorous assessment of the effects on European protected sites in accordance with the applicable statutory tests. This assessment is critical to safeguard protected habitats and species from adverse impacts arising from development. The absence of a demonstrably adequate Habitats Regulations Assessment undermines the statutory protection afforded to these sites.

The evidence clearly indicates that compliance with these legal requirements has not been demonstrated. There are significant deficiencies and omissions in the environmental impact assessment and the habitats regulations assessment submitted in support of the proposal. These shortcomings represent a direct conflict with the applicable legal and policy framework governing environmental protection and planning consent.

In light of these failures, the proposal does not satisfy the mandatory procedural and substantive requirements necessary for lawful determination. Consequently, these unresolved deficiencies weigh decisively against the granting of consent.

The proposal fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be considered and given due weight in the decision-making process. There is no evidence within the application or supporting documentation that properly addresses or weighs these interests, resulting in a clear omission in the assessment. This failure to engage with the statutory duty under the Act represents a significant procedural and substantive deficiency.

Given that the evidence identifies this omission and a conflict with the applicable legal and policy framework, the proposal cannot be regarded as meeting the necessary statutory tests. As established by the Islands (Scotland) Act 2018 and confirmed in the approved evidence, where compliance has not been demonstrated, such deficiencies weigh decisively against the granting of consent. Therefore, the application should be refused on the basis that it does not properly consider or give due weight to the interests of island communities as required by law.

The applicant has failed to discharge the fundamental responsibility of demonstrating compliance with all relevant legal and policy requirements. It is an established principle that the onus lies with the applicant to provide robust, objective, and proportionate evidence confirming that every applicable statutory duty, planning policy, and environmental assessment obligation has been fully satisfied. In this case, the submitted evidence does not meet this evidential burden.

Specifically, the application lacks sufficient demonstration that all statutory duties have been addressed, and there are clear deficiencies and omissions within the supporting documentation. These shortcomings result in unresolved conflicts with the applicable legal and policy framework. Such failures are material and significant,

as the absence of conclusive evidence confirming compliance undermines the legitimacy of the application.

Given these evidential deficiencies and the applicant's failure to meet the required standard of proof, the proposal cannot be considered compliant with the statutory and policy framework governing the development. Consequently, these unresolved matters must weigh decisively against the granting of planning consent.

1.1.487 Conflict with National Planning Framework 4 and the Development Plan

NPF4 Policy 11 endorses renewable energy development, yet this endorsement is contingent upon adherence to specific impact criteria within the policy itself. These include Policy 11(c), which addresses impacts on communities, and Policies 11(d) and 11(e), which concern impacts on landscape, seascape, and other receptors. The policy's support is therefore conditional and does not override these critical considerations.

In applying these criteria to the proposal, it becomes evident that compliance has not been demonstrated. The proposal would result in significant adverse effects on nationally designated landscapes and seascapes. Furthermore, there is a lack of evidence to confirm that the cultural significance of scheduled monuments and their settings would be protected, or that island communities would be adequately safeguarded. Additionally, the ecological assessments required have not been shown to meet necessary standards based on the submitted evidence. Consequently, the proposal conflicts with the impact criteria set out in NPF4 Policy 11, undermining the policy's support for renewable energy development in this instance.

The proposal would result in significant adverse effects on nationally designated landscapes and seascapes, undermining the qualities for which these areas have been protected. This practical consequence is directly at odds with the safeguards enshrined in National Planning Framework 4 (NPF4), specifically Policy 11 in conjunction with Policies 4(c) and 4(d), which collectively aim to preserve the intrinsic value of National Scenic Areas and nationally important landscapes.

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

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

The proposal conflicts with the terrestrial development plan framework, including the Argyll and Bute Local Development Plan 2, resulting in adverse effects on the landscape, heritage, and community interests that these policies are designed to protect. This inconsistency undermines the objectives of the development plan, which seeks to safeguard these key local attributes. Furthermore, the proposal is not only at odds with the local development plan but also fails to align with the broader strategic aims set out in National Planning Framework 4. The applicant has not provided evidence to demonstrate that these conflicts can be mitigated or justified. Consequently, the proposal is fundamentally incompatible with the relevant terrestrial development plan policies.

1.1.488 Seascape, Landscape and Visual Effects

The applicant's written methodology, as set out in Appendix 16.1, notably lacks any specified distance threshold beyond which major effects cease. Nevertheless, an independently prepared Evidence Note, which draws entirely upon the applicant's own Chapter 16 and Appendices 16.1 to 16.3, reveals a clear and consistent pattern across all three streams of assessment. This pattern demonstrates that no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of the receptor's sensitivity or the extent of visibility. Furthermore, the applicant's own documentation explicitly acknowledges the influence of distance on effect judgements. For example, the assessment of a coastal area situated over 30 kilometres from the site concludes that, given the viewing distance, the scale of change is considered small. Similarly, the Landscape Character synthesis categorises magnitude as High within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types.

This reliance on distance as a moderating factor in the assessment has significant implications for the reliability of the conclusions drawn. By systematically reducing the magnitude of effects at the very distances where the most sensitive designated landscapes are located, the inputs to the protective tests are effectively understated. As a result, the final assessments presented do not provide a dependable description of the likely effects that the Scottish Ministers are being asked to consent to. Such an approach risks underrepresenting the true impact on sensitive receptors and consequently undermines the robustness of the decision-making process.

While mitigation measures are often informed by visual assessments, it is important to recognise the inherent limitations of the visualisation materials employed. The applicant's adherence to NatureScot's visualisation guidance ensures a standardised approach; however, this guidance explicitly acknowledges that printed visualisations cannot fully replicate the scale or immersive experience perceived by a viewer in the field. Consequently, reliance on these materials may understate or distort the actual visual impact of a development.

Furthermore, the wireline drawings included alongside photographic panoramas are not independent tools that correct or enhance the photographic evidence; rather, they are technical renderings subject to the same perceptual constraints as the photographs they accompany. This means that both forms of visualisation share inherent limitations and should be interpreted cautiously when assessing the true

visual effects. Given these constraints, decision-makers should consider the potential discrepancies between visualisation materials and real-world perception when evaluating the visual impact of the proposal.

The applicant's evidence acknowledges that the proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, thereby permanently altering the character of the night-time seascape throughout the stated 35-year operational life. This change represents a significant visual impact, as the introduction of such lighting would be a novel and enduring feature in an area previously characterised by natural darkness.

It is important to note that, in policy terms, the 35-year operational life does not limit the potential harm to the seascape. The decision to consent to this development effectively constitutes a decision that this particular seascape is considered appropriate for wind farm use, with the attendant acceptance of changes to its character. This policy implication underscores the need for careful consideration of the balance between development benefits and the preservation of seascape qualities.

Given these factors, the impact of the lighting on the night-time seascape character requires thorough assessment within the planning process. While the operational timeframe may be finite, the policy consequences of consenting to such an alteration are enduring, necessitating a measured approach that weighs the permanent visual effects against the broader objectives of sustainable development.

While the applicant acknowledges certain effects on landscape and seascape interests, it has failed to demonstrate that these effects have been adequately mitigated in accordance with relevant policy requirements. Specifically, these effects engage National Planning Framework 4 (NPF4) Policies 4(c) and 4(d), 11(d) and 11(e), alongside Policy GEN 7 and paragraph 4.28 of the National Marine Plan. Despite this, the applicant has not shown that its conclusions regarding the scale of these accepted effects align with its own stated methodology. Consequently, compliance with policies designed to protect nationally important landscapes and seascapes remains unproven, undermining the proposal's conformity with the established planning framework.

1.1.489 Cultural Landscape, Archaeology and Historic Environment

The practical consequence of the applicant's failure to properly apply the recognised methodology for assessing effects on the setting of historic assets is that the reliability of their conclusions regarding heritage impacts is fundamentally undermined. Although the applicant claims to have followed Historic Environment Scotland's established approach, which emphasises evaluating how changes to setting affect the contribution that setting makes to an asset's cultural significance and whether the integrity of that setting is adequately retained, their assessment falls short of these requirements. Notably, the methodology explicitly advises against equating visual change directly with adverse impact, yet the applicant's report does not adequately demonstrate this critical distinction.

A detailed Methodological Audit, prepared independently in support of community objections and based solely on the applicant's Appendix 14.3, highlights that while the operational assessment identifies relevant heritage attributes, it fails to show how the integrity of setting has been assessed in accordance with the applicant's own accepted methodology. Instead, the assessment largely focuses on describing visual change—considering factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—before concluding that the integrity of setting remains intact. This approach omits the essential evaluative step required by the methodology, as none of the worked examples examined in the Audit demonstrate how the integrity of setting has been critically appraised beyond mere visual description.

In light of this, the applicant's assessment cannot be relied upon to provide a robust or methodologically sound evaluation of heritage impacts. The absence of a transparent and rigorous assessment of setting integrity calls into question the validity of the conclusions drawn and undermines confidence in the planning decision-making process. It is therefore essential that any determination of this application takes into account the methodological deficiencies identified and requires a reassessment that fully complies with the established Historic Environment Scotland methodology.

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

The heritage impact conclusions presented rely significantly on the findings of the landscape assessment. According to the evidence, any understatement of landscape effects directly influences and diminishes the accuracy of the heritage conclusions that are derived from them. This interdependence suggests that if the landscape assessment fails to fully capture the extent or significance of the effects, the subsequent evaluation of heritage impacts will inevitably reflect that same understatement.

This reliance raises concerns about the overall credibility of the heritage conclusions. By building upon an assessment that potentially downplays landscape effects, the

heritage analysis may not adequately account for the full scope of impacts, thereby undermining its robustness. It is therefore essential that the landscape assessment be thorough and accurate, as deficiencies in this area compromise the validity of the heritage impact conclusions that depend upon it.

The application fails to demonstrate adequate mitigation measures to protect heritage assets, falling short of the requirements set out in relevant policy. This matter engages NPF4 Policy 7(h) concerning scheduled monuments, alongside Policies 7(c) and 7(d) which address the setting of such assets, as well as GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Crucially, the applicant has not provided evidence that the cultural significance of internationally and nationally important heritage assets and their settings will be safeguarded. Consequently, the Scottish Ministers lack the necessary assessment to conclude that these heritage interests would be properly protected. This absence of demonstrable compliance with key heritage protection policies undermines the acceptability of the application.

1.1.490 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development rely to an exceptional degree on visitors, who are drawn specifically by the qualities identified in the applicant's own baseline assessments: landscape, seascape, cultural heritage, tranquillity and remoteness. These attributes form the fundamental appeal that sustains visitor numbers and underpin the local economy.

Any alteration to these defining characteristics would directly undermine the economic foundation of these communities. Such an impact would inevitably extend beyond immediate economic effects, threatening local services, reducing population stability, and ultimately jeopardising the long-term viability of the island settlements. Consequently, the proposal poses a significant risk to the fundamental economic and social sustainability of these island communities.

The practical consequence of the applicant's approach is a significant gap in understanding and mitigating the impacts of the proposal on island communities. Although the applicant's own consultants identified habitability as a potentially significant pathway for effects on these communities, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment conducted in Chapter 18 focuses primarily on regional port communities, leaving the island communities facing the development without an equivalent, place-based evaluation. Despite this omission, the assessment nonetheless concludes that these island communities are of low sensitivity to tourism effects, a conclusion that does not reflect the realities on the ground.

This generalised conclusion overlooks the particular nature of small island economies, which are not comparable to regional averages. These economies are often heavily concentrated in sectors directly dependent on the qualities that attract visitors, making them inherently more vulnerable to changes affecting tourism. Moreover, an increasing reliance on visitor numbers tends to deepen rather than reduce this sensitivity, as it intensifies dependence on those at-risk qualities. Therefore, the assertion of low sensitivity, reached without detailed, place-specific analysis, lacks evidential foundation and amounts to an unwarranted assumption.

Without a robust, island-focused socio-economic assessment, the proposal risks underestimating the true impacts on these vulnerable communities.

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

In this context, the applicant has not demonstrated that the proposal is compatible with the sustainability of island communities, nor has it evidenced compliance with the statutory duties owed to these populations. The failure to undertake the necessary socio-economic assessment and to engage meaningfully with island stakeholders undermines the soundness of the proposal under the relevant planning policies and statutory instruments. Consequently, the proposal falls short of the required standards for assessing and protecting island communities, warranting refusal on the basis of non-compliance with established policy and statutory duties.

1.1.491 Ecology, Biodiversity and Habitats Regulations

The proposed development would bring extensive construction, operational, and decommissioning activities into an ecologically sensitive environment for a prolonged period of decades. Priority Marine Features and Annex I habitats are present within the development site itself, while the surrounding waters provide habitat for seabirds, marine mammals, and basking sharks. This concentration of protected species and habitats underlines the ecological importance of the area and indicates a high potential for significant adverse environmental effects resulting from the scale and duration of the proposed works. Given these considerations, the potential for ecological harm must be carefully weighed against the benefits of the development.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan focused specifically on the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are typically prepared for circumstances where an adverse effect on the integrity of a protected site cannot be ruled out. Their inclusion in the application is therefore a material consideration, signalling the applicant's acknowledgement of potential impacts.

Importantly, the applicant's approach concedes that Scottish Ministers may reach a different conclusion regarding adverse effects on the protected site's integrity. This recognition underscores that the submitted derogation and compensation documents are intended to address and mitigate potential impacts in accordance with relevant provisions, rather than to pre-empt regulatory assessment. As such, these

documents form a critical component of the application's approach to compliance with protection requirements.

The practical consequence of the stringent legal and policy framework under the Habitats Regulations is that planning consent for developments affecting protected habitats and species can only be granted when it is clearly demonstrated that the proposal will not adversely affect the integrity of the protected site. This requirement imposes a high evidential standard: no reasonable scientific doubt can remain regarding the absence of adverse effects. It is not sufficient for an applicant to rely solely on mitigation, compensation proposals, or commitments to future monitoring as these do not, by themselves, satisfy the statutory tests necessary to lawfully grant consent.

This legal framework is reinforced by relevant policy provisions, including GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). Together, these provisions ensure that developments are subject to rigorous assessment and that consent decisions are made only when the strict derogation tests are conclusively met. Consequently, the burden of proof lies firmly with the applicant to provide robust, scientific evidence that the proposed development will not compromise the protected habitat's integrity before any consent can be lawfully granted.

The applicant has failed to demonstrate compliance with the statutory tests designed to protect internationally important habitats and species, as evidenced by their own derogation documents. These documents reveal significant uncertainty regarding the ability to meet the legal requirements essential for safeguarding these ecological features. Without clear satisfaction of these tests, the application inherently risks causing harm to protected environmental assets.

This lack of demonstrable compliance undermines the fundamental basis for granting consent. The statutory framework exists to ensure that developments do not adversely affect internationally important ecological interests unless strict criteria are met. The evidence before the decision-maker does not provide the necessary assurance that these criteria have been fulfilled, meaning the application falls short of the legal standards required for approval.

In conclusion, the failure to satisfy the statutory protection tests for internationally important habitats and species decisively weighs against this proposal. On the evidence submitted, consent should not be granted as doing so would conflict with statutory obligations and the overarching duty to conserve critical ecological assets.

1.1.492 Cumulative and In-Combination Effects

The current assessment approach submitted to the Scottish Ministers is fundamentally flawed, as only a portion of the overall project—the wind farm itself—is under consideration. Crucially, the export cable corridor and onshore transmission works, which are indispensable for the wind farm's operation, have been deferred to separate future applications. This fragmentation means that the environmental and cumulative effects of the entire project are never evaluated in a single, comprehensive process. Instead, significant components are subject to subsequent

consenting procedures following the principal decision, thereby undermining a holistic understanding of the project's impacts.

Such an approach conflicts with established legal principles, as underscored by the courts in Raeshaw Farms, which mandate that a project must be assessed in its entirety rather than being artificially segmented into parts whose individual effects may seem less significant. By salami-slicing the project, the assessment fails to capture the full scope of potential environmental and social consequences, rendering the decision-making process incomplete and procedurally unsound. Consequently, this piecemeal evaluation is contrary to both legal precedent and sound planning practice, and should be reconsidered to ensure a thorough and integrated assessment of all project elements.

The practical consequence of relying on the current cumulative impact assessment is a significant underestimation of the true combined effects of the proposed development alongside existing, consented, and foreseeable projects. This arises because the cumulative assessments are fundamentally dependent on the conclusions drawn in the broader Environmental Impact Assessment. Specifically, where the baseline assessments for landscape, heritage, and socio-economic factors have understated the severity of impacts—as previously demonstrated—the cumulative assessment inherits these understated effects. As a result, the baseline from which cumulative impacts are measured is artificially reduced, leading to a cumulative impact appraisal that fails to reflect the real magnitude of combined effects. Consequently, the cumulative impact assessment cannot be regarded as reliable or comprehensive in its current form.

The failure to adequately consider the cumulative and in-combination effects of the proposal, including deferred works, compromises compliance with key planning policies and environmental regulations. Specifically, the requirements of GEN 21 and paragraph 4.85 of the National Marine Plan, alongside NPF4 Policy 11(e) and the EIA Regulations concerning project splitting, have not been met. The applicant has not reliably identified or assessed the overall impacts of the project as a whole. It is therefore essential that the decision-making process explicitly addresses the treatment of deferred works to ensure full regulatory compliance and informed assessment.

1.1.493 Public Engagement, Site Selection and Environmental Information

The applicant requests that Scottish Ministers place significant weight on the site-selection process, thereby rendering the quality of public participation in that process directly relevant. However, deficiencies in public involvement at both the plan and site-selection stages have persisted into the application phase. The application itself comprises many thousands of pages of technical material, yet the consultation period coincided with the busiest months for island communities, when residents are engaged continuously throughout the visitor season and specialist advice is least accessible. In contrast, the applicant has had years and substantial professional and financial resources to prepare its case.

GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, mandates that those affected by

decisions of this magnitude must have a realistic opportunity to participate. The conditions under which the affected communities have been required to respond do not meet this standard. It is therefore essential that Ministers take this shortfall firmly into account when considering the representations made, as the legitimacy of the site-selection process is undermined by these deficiencies in consultation timing and public participation.

The Environmental Impact Assessment forms the essential evidential foundation for the Scottish Ministers' decision-making on this application. However, significant deficiencies undermine its sufficiency. Across several critical topics, the assessment identifies potential pathways to significant effects but fails either to investigate them thoroughly or to apply appropriate methodologies. For instance, the landscape assessment's conclusions rely on a distance-based pattern absent from its own stated methodology; the heritage assessment does not adequately apply its declared integrity test; and the socio-economic assessment omits any place-based analysis of the affected islands.

Moreover, the application frequently depends on future assessments, post-consent plans, monitoring schemes, and subsequent approvals to address unresolved issues. This approach conflicts with the requirements of the Environmental Impact Assessment Regulations, which mandate that likely significant effects be comprehensively understood prior to determination. Reliance on uncertain future measures cannot substitute for robust, complete information at this decisive stage.

In conclusion, the Scottish Ministers must base their determination on the evidence currently before them, not on assumptions that outstanding matters will be satisfactorily resolved after consent. The applicant has not demonstrated that the environmental information submitted meets the standard of adequacy necessary for an informed decision. Consequently, the assessment as presented is insufficient to support approval.

1.1.494 Effects on Local Area

The applicant's assessment significantly underestimates the direct and substantial effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby undermining the reliability of the overall environmental and heritage impact evaluation. Islay and Colonsay, being the closest inhabited islands to the proposed development area—which lies immediately north-west of Islay and west of Colonsay—receive an assessment that is fundamentally flawed. The application primarily considers Islay only in terms of its potential as a direct project location, rather than recognising it as an affected island community with distinct social and economic characteristics. Notably, the Atlantic-facing communities of Islay confront the nearest edge of a 448 square kilometre development zone, yet there is no place-based analysis of how this proximity would influence their setting, economy, or community life.

The situation is equally concerning for Colonsay and Oronsay, where the seaward outlook integral to daily life directly faces the proposed array. The North Colonsay and Western Cliffs Special Protection Area, which constitutes Colonsay's coastline, is central to the applicant's derogation case and compensation strategy. This

acknowledgement implicitly concedes that harm to the internationally protected seabird population of these cliffs cannot be ruled out. Moreover, Oronsay Priory, a scheduled monument of national importance, lies within this community's sphere, yet the significant deficiencies identified in the heritage assessment regarding the treatment of open maritime settings are fully applicable here. Taken together, these points demonstrate that the applicant's evaluation fails to adequately address the scale and nature of impacts on these island communities and their heritage assets.

The applicant's assessment significantly underestimates the scale and significance of visual and community impacts on Iona, leading to an incomplete understanding of the environmental and social consequences. The Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity, with direct orientation towards the proposed development, extensive visibility, and a large geographical extent of change. The turbines would be visible from approximately 21 kilometres away, spanning around 39 degrees of the horizon, thereby affecting the ferry crossing between Fionnphort and Iona. Similarly, the West Coast of Iona is acknowledged as highly sensitive with widespread visibility, and the applicant concedes that significant effects would be experienced by residents and visitors across much of the island, including at Dùn Ì, its highest point. Despite this recognition, the assessment omits a comprehensive evaluation of habitability impacts on the local community, a pathway identified by the applicant's own consultants, even though a household consultation revealed that 92 per cent of respondents on Iona object to the proposal.

Moreover, the proposal's impact on Iona's internationally important monastic landscape is inadequately addressed. The applicant's baseline recognises the significance of pilgrimage, arrival by sea, and movement through the landscape as critical to the heritage value of sites such as the Abbey, the Nunnery, and the high crosses. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet no visualisation has been provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, a key vantage point. To contextualise the scale of visual impact, the largest turbines would exceed the height of Ben Hynish on Tiree—a familiar landmark standing at 141 metres and visible from Iona at approximately 33 kilometres—by around 194 metres, despite being viewed from roughly two-thirds of that distance. This comparison further emphasises that the applicant's assessment fails to fully capture the extent and significance of the visual and heritage effects on Iona, thereby compromising the accuracy of the overall environmental and social impact evaluation.

The applicant's assessment acknowledges significant effects on several key areas of Mull and Ross of Mull, including the Ross of Mull South coastal area, which is identified as having High sensitivity at distances of approximately 22 to 24 kilometres and is attributed a Medium magnitude of impact. Notably, significant effects are accepted at Erraid and on the Core Paths of the Ross, as well as at Fionnphort—the critical gateway to Iona and the embarkation point for visitors—where the community's experience is recognised as being significantly affected due to its direct connection to visitor flows.

Across Mull more broadly, the applicant concedes significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Areas. The Loch na

Keal National Scenic Area, encompassing the western waters and islands of Mull, is assessed as having High sensitivity throughout a range of approximately 21 to 33 kilometres, yet the magnitude of impact attributed does not exceed Medium. This raises concerns regarding the adequacy of the assessment in capturing the true extent of effects within these designated landscapes.

Further, the approach taken to areas such as the Wilderness and Gribun Rocks coastal area—where the applicant reasons that the scale of change is small due to viewing distances exceeding 30 kilometres—exemplifies a reliance on distance-based criteria that may understate potential impacts. Crucially, the west-facing tourism economy of Mull, along with its wildlife boat operations and accommodation in western townships, depend heavily on the Atlantic seascape, which the proposed development would industrialise. Despite this, none of these communities have been the subject of a place-based assessment, leaving a significant gap in understanding and addressing the localised economic and community effects.

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

Further concerns arise regarding other significant islands within the same National Scenic Area. Staffa, one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development site—beyond the 30 kilometre limit to which NatureScot recommended assessing effects on National Scenic Area qualities. The applicant concludes that any changes at Staffa would be small and not significant, a judgment that appears inconsistent with their own acceptance of the island's panoramic maritime qualities. Similarly, the Jura National Scenic Area, recognised for its wild and undeveloped Atlantic character, is assessed as having only Medium to Low magnitude effects despite its High sensitivity and proximity of 28 to 32 kilometres. This moderation is attributed to distance and retained landforms, yet it fails to adequately reflect the intrinsic value of Jura's outlook that underpins its designation.

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

The applicant's assessment concludes a Low magnitude of change on the South Tiree coastal area despite recognising its High sensitivity at approximately 35 kilometres distance. This practical conclusion severely understates the true extent of the impact on Tiree's landscape, resulting in an unreliable evaluation that could misinform decision-making and undermine effective mitigation.

Tiree's landscape character is exceptionally distinctive, defined by its low-lying terrain and the dominance of sea and sky. The island's highest point, Ben Hynish, rises to just 141 metres, reinforcing an open oceanic horizon free from vertical intrusions. Introducing turbines reaching up to 335 metres would represent a dramatic departure from this established seascape character, creating unprecedented vertical structures that would be highly conspicuous and discordant.

Given the fundamental role that openness and horizontality play in defining Tiree's landscape, the applicant's Low magnitude conclusion for such an exposed and sensitive receptor is fundamentally flawed. It significantly understates the magnitude of change and impact, thereby compromising the reliability of the assessment and the planning process that depends upon it.

The applicant's assessment fails to consider the significant effects on several mainland and island communities that have direct views of, and economic reliance upon, the seascape where the development is proposed. This omission has practical consequences for the accuracy and completeness of the environmental evaluation, as these communities represent key receptors whose social and economic well-being is closely intertwined with the quality and character of the surrounding marine environment. Without their inclusion, the assessment cannot be regarded as comprehensive or fully informed.

Among the communities overlooked is Gigha, a community-owned island of national significance due to its residents' purchase, which symbolises island regeneration. Gigha faces the development site from the east, yet the effects on its finely balanced community and economy have not been examined. This is a notable omission given the island's unique status and the potential sensitivity of its social and economic fabric to changes in seascape character. Similarly, Ardnamurchan Point—the most westerly point of the British mainland—commands panoramic views along the Hebridean seaboard that attract visitors to the peninsula. These seaward panoramas are precisely the receptors to which the applicant's distance-based moderation approach should apply, but it has been disregarded.

Further, the west coast of Kintyre comprises a chain of communities whose outlook, character and visitor economy are defined by the open Atlantic seaboard looking towards Islay, Jura, and the wider waters beyond. The Treshnish Isles and other small islands and mainland coasts with views towards the development area share this position. The failure to assess impacts on these interconnected communities undermines the robustness of the environmental appraisal and risks neglecting the socio-economic repercussions of the proposal. It is essential that the assessment be revisited to address these gaps, ensuring all relevant receptors are properly considered.

The applicant’s approach to mitigation systematically diminishes the significance of effects on sensitive receptors located beyond 20 kilometres by moderating the magnitude of change and discounting the resulting impacts. This methodology effectively undermines the environmental impact assessment’s integrity, as it fails to provide any place-based evaluation for the communities experiencing these effects. Taken together, the evidence demonstrates that wherever a highly sensitive receptor lies beyond this 20-kilometre threshold, the assessment’s reductionist treatment leads to an absence of meaningful analysis for those affected populations. Consequently, the applicant’s distance-based approach results in an incomplete and potentially misleading understanding of the environmental consequences, warranting reconsideration to ensure all significant effects are appropriately recognised and addressed.

1.1.495 Personal Observations

In addition to the planning matters above, I am personally concerned because: This proposal significantly changes, and in fact destroys, the remote, peaceful, restorative island experience. Along with marine and bird life that will be affected, so will the mental health of all those who live on Iona and other islands, as well as those who come seeking solace for the soul.

Based on my own local knowledge, I also wish to highlight that: We have already seen more vulnerable whales and dolphins in recent years, washing up on beaches. Their habitat should be protected, not invaded. Birdlife will be affected from migration paths and the marine life severely disrupted. This is not something that should be destroyed for the financial gain of others.

Finally, I would also ask the Scottish Ministers to consider: The scale of this proposal is obscene. There must be other more sustainable options considered.

1.1.496 Further Comments

To read Richard Powers' book Playground considers many of the things affecting this proposal, with one exception. The strong reaction against this proposal from the island communities suggests no benefit to the communities who are forced to pay the price. To ignore the needs of wildlife and the human soul, is to take our society further into dissolution of care for the environment and each other.

1.1.497 Summary

This proposal fails to satisfy the statutory and policy requirements governing its determination. The applicant’s own evaluation acknowledges significant adverse impacts on nationally designated landscapes, as well as on the heritage and communities along this coastline. However, published analyses of the applicant’s documentation reveal that these effects have been understated. Notably, the necessary heritage assessment has not been conducted. Furthermore, while the effects on the island communities affected by the development were identified, no assessment of these impacts has been undertaken. The ecological tests required to meet statutory obligations have not been demonstrated as achievable. Compounding

these issues, only a portion of the project is currently submitted for consideration by the Scottish Ministers.

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

Should the Ministers decide against refusal, it is requested that they require the submission of further environmental information alongside enhanced visualisations. The applications should then be determined only following a public inquiry, providing a forum where the concerns raised in this objection can be thoroughly scrutinised. Moreover, it is sought that, irrespective of the outcome, the Ministers explicitly address and include in their decision the effects on cultural heritage and the impacted island communities.

Yours faithfully,

[Redacted]

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

Member of the public 553
Dear Sir/Madam,

I hereby formally oppose the MachairWind Offshore Wind Farm proposals submitted by MachairWind Limited (ScottishPower Renewables) under application numbers 00012385 and 00012386, seeking consent pursuant to section 36 of the Electricity Act 1989 and a marine licence under Part 4 of the Marine (Scotland) Act 2010 respectively. I request that this correspondence be recorded as an official objection, that I am registered accordingly, and that I receive notification of the final determination relating to these applications.

The development in question proposes an offshore wind farm with an installed capacity of approximately 2 gigawatts, consisting of between 91 and 144 turbines each reaching up to 335 metres in height to blade tip. The proposed site occupies a Windfarm Development Area of around 448 square kilometres in the sea to the north-west of Islay and west of Colonsay, situated roughly 21 kilometres from Iona, and in proximity to various islands and coastal communities within the southern Hebrides.

The following discussion presents the planning and environmental grounds for objection, firmly grounded in the statutory and policy context applicable to the determination of these proposals. It must be emphasised that the onus lies entirely with the applicant to provide adequate evidence demonstrating compliance with all relevant legal and policy tests. Objectors bear no responsibility to disprove the application. Upon careful consideration, it is evident that the applicant has failed to meet this evidential burden, and for the reasons elucidated herein, the applications should be refused consent.

1.1.498 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989, which require the applicant to have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. This failure has practical consequences in that the proposal risks causing unmitigated harm to these protected interests.

The evidence confirms that the applicant has not adequately addressed these statutory requirements, nor taken reasonable steps to mitigate adverse effects arising from the proposal. This omission represents a clear deficiency in the application and conflicts with the legal framework governing such developments. The Scottish Ministers, as the determining authority, are required to have regard to these same duties and cannot lawfully grant consent where compliance has not been demonstrated.

Given these shortcomings, the application should be refused. The failure to meet the statutory duties under Schedule 9 weighs decisively against the granting of consent, as the proposal does not satisfy the essential legal and policy obligations intended to safeguard important environmental and heritage interests.

The marine licence application under consideration fails to comply with the statutory requirements set out in Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland's National Marine Plan. As authorisation decisions must be taken in accordance with the National Marine Plan unless relevant considerations indicate otherwise, this application must demonstrate full compliance with the General Policies that are directly applicable to the proposal. These include GEN 4 on Co-existence, GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 and paragraph 4.85 addressing Cumulative Impacts. The application, however, does not provide sufficient evidence to confirm adherence to these policies, which is a fundamental requirement for lawful determination.

The absence of demonstrated compliance with these policies constitutes a significant deficiency in the application. The evidence submitted fails to adequately address the potential impacts on the historic environment, landscape character, natural heritage, and cumulative effects, as required by the National Marine Plan. Furthermore, the application does not meet the standards for engagement and sound evidence as prescribed by GEN 18 and GEN 19, undermining the robustness and reliability of the assessment. These omissions and shortcomings represent clear conflicts with the applicable legal and policy framework, which must be given substantial weight in the decision-making process.

Given these unresolved deficiencies and the failure to meet the statutory and policy requirements, the application cannot be considered compliant with the Marine (Scotland) Act 2010 and the National Marine Plan. As established by the statutory assessment criteria, where compliance has not been demonstrated or where evidence identifies such conflicts and omissions, these matters weigh decisively against the granting of consent. Therefore, the marine licence application should be refused on the grounds that it does not satisfy the necessary legal and policy obligations.

The proposal fails to comply with key policies of National Planning Framework 4, specifically Policies 3, 4, 7, and 11, which address biodiversity, natural places, historic assets, and energy. This non-compliance represents a significant material consideration that weighs heavily against the granting of consent. The statutory duties and legislative requirements that underpin these policies have not been adequately met, undermining the proposal's legitimacy within the current planning framework.

The evidence demonstrates that compliance with these policies has not been established. There are clear deficiencies and omissions in the application's assessment of impacts on biodiversity and natural places, as well as insufficient consideration of effects on historic assets. Furthermore, the proposal fails to satisfy the energy requirements set out in Policy 11. These shortcomings constitute direct conflicts with the applicable legal and policy framework, which must be given decisive weight in the determination process.

Given the absence of demonstrated compliance and the presence of material conflicts with National Planning Framework 4, the proposal cannot be considered consistent with the statutory planning regime. As such, the failure to meet these essential policy requirements provides a firm basis for refusal of planning permission.

The proposal fails to meet the statutory requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations, which mandate that the likely significant environmental effects must be identified, assessed, and reported prior to any determination. This fundamental procedural step has not been adequately fulfilled, resulting in an incomplete environmental impact assessment that undermines the decision-making process.

Furthermore, the proposal does not comply with the Habitats Regulations, which require a thorough assessment of the effects on European protected sites in accordance with the relevant statutory tests. The absence of such an assessment or the failure to demonstrate compliance with these tests constitutes a serious omission that conflicts directly with the legal framework governing protected habitats.

Given these deficiencies and the failure to demonstrate compliance with both the environmental impact assessment and habitats regulations, the proposal is in clear conflict with the applicable legal and policy requirements. Such shortcomings must weigh heavily against the granting of consent in this case.

The proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018, which has significant practical consequences for the decision-making process. The Act explicitly requires that the interests of island communities be taken into account and given due weight when determining planning applications affecting such areas. This statutory obligation is not a discretionary matter but a legal requirement that must be demonstrably fulfilled.

In this case, there is no evidence that the proposal has adequately addressed or incorporated the specific interests of island communities into its assessment. The absence of such consideration constitutes a clear deficiency and omission in the planning submission. Without demonstrable compliance with the Islands (Scotland) Act 2018, the proposal conflicts with the applicable legal and policy framework governing development in island contexts.

As established by the statutory guidance and confirmed in the approved evidence, where compliance with the Act has not been demonstrated, or where deficiencies and omissions are identified, these factors weigh decisively against the granting of consent. The failure to properly consider island community interests undermines the integrity of the decision-making process and renders the proposal contrary to the statutory requirements set out in the Islands (Scotland) Act 2018.

Accordingly, the proposal should be refused on the basis that it does not meet the mandatory legal obligation to consider and give due weight to the interests of island communities, as required by the Islands (Scotland) Act 2018.

The applicant has failed to provide robust, objective, and proportionate evidence to demonstrate compliance with every relevant statutory duty, planning policy, and environmental assessment requirement. This failure constitutes a fundamental deficiency in the application, as the evidential burden rests squarely on the applicant to prove that all legal and policy frameworks have been satisfied. The absence of such demonstration means that the application does not meet the necessary standards for lawful and policy-compliant development. Furthermore, the evidence submitted reveals omissions and conflicts with the applicable legal and policy framework, which directly weigh against the granting of consent. In light of these clear and unaddressed shortcomings, the application cannot be considered compliant or acceptable, and consent should therefore be refused.

1.1.499 Conflict with National Planning Framework 4 and the Development Plan

NPF4 Policy 11 explicitly supports renewable energy development; however, such support is contingent upon satisfying the impact criteria set forth within the policy itself. These include, notably, Policy 11(c), which addresses impacts on communities, alongside Policies 11(d) and 11(e), which pertain to impacts on landscape, seascape, and other receptors. The policy framework thus requires that any proposed development must demonstrate compliance with these criteria to secure its legitimacy under NPF4.

In this case, the proposal fails to meet these essential requirements. It would result in significant adverse effects on nationally designated landscapes and seascapes, undermining the integrity of these protected areas. Furthermore, there is no convincing evidence that the cultural significance of scheduled monuments and their settings would be preserved, nor that island communities would be adequately safeguarded from detrimental impacts. Additionally, the ecological assessments submitted do not demonstrate that the necessary environmental tests can be satisfied. Taken together, these shortcomings establish a clear conflict with the impact criteria of NPF4 Policy 11, thereby weakening the policy’s intended support for renewable energy in this instance.

The proposal, as currently presented, would result in significant adverse impacts on a range of nationally designated assets, undermining the protections established by the National Planning Framework 4 (NPF4). Most notably, it would cause substantial harm to the qualities for which National Scenic Areas and other nationally important landscapes and seascapes have been designated. This outcome directly conflicts with Policy 11, which works in tandem with Policies 4(c) and 4(d) to safeguard these special places from detrimental effects. The practical consequence is a clear failure to uphold the statutory purpose of these designations, thereby weakening the integrity of landscape conservation at a national level.

In addition to landscape concerns, the proposal fails to demonstrate adequate protection for heritage assets, particularly scheduled monuments and their settings. Policies 7 and 7(h) require that development does not adversely affect the cultural significance of such assets, ensuring their preservation for future generations. However, the evidence submitted does not convincingly establish that these requirements would be met. Nor does it confirm that island communities, which often have unique historical and social characteristics, would be safeguarded in line with

Policy 7(c) and 7(d). The lack of clarity and assurance in this regard raises substantial doubts about the proposal's compliance with heritage protection standards within NPF4.

Furthermore, the ecological criteria set out in Policy 3 have not been satisfactorily addressed. The proposal has not provided sufficient evidence to confirm that the ecological tests—designed to conserve and enhance biodiversity—can be met. This omission is critical, as the protection of biodiversity is a fundamental objective underpinning national planning policy. Taken together, these deficiencies demonstrate that the proposal is inconsistent with the comprehensive framework of NPF4 policies intended to protect designated landscapes, heritage assets, and biodiversity. Consequently, it should not be supported in its current form.

The proposal's adverse impacts on landscape, heritage, and community interests, as protected by the Argyll and Bute Local Development Plan 2, indicate a clear conflict with the terrestrial development plan framework. This conflict arises notwithstanding any mitigation measures, which have not been shown to adequately address these effects. Consequently, the proposal is inconsistent with both the local development plan and the National Planning Framework 4 when considered in their entirety, and the applicant has failed to demonstrate otherwise.

1.1.500 Seascape, Landscape and Visual Effects

There is considerable uncertainty regarding the reliability of the applicant's assessment methodology, particularly in relation to distance thresholds and their influence on predicted effects. Notably, the applicant's written methodology, as set out in Appendix 16.1, does not specify any distance beyond which major effects are considered to cease. However, an independently prepared Evidence Note, which draws exclusively on the applicant's Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of receptor sensitivity or visibility extent. This suggests that distance plays a determinative role in the judgements made. Further, the applicant's own documents confirm this reliance on distance, with assessments of coastal areas over 30 kilometres away describing the scale of change as small due to viewing distance. The Landscape Character synthesis within these documents delineates impacts of High magnitude within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. The effect of this approach is to apply protective tests to inputs that are systematically moderated at distances where some of the most sensitive designated landscapes are situated. Consequently, the conclusions presented do not reliably represent the true effects that the Scottish Ministers are being asked to consider.

When assessing the visual impact of proposed developments, it is important to compare the limitations of the visualisation materials with any mitigation measures put forward. In this case, the applicant has relied on visual evidence prepared in accordance with NatureScot's guidance. While this approach represents best practice, it is essential to recognise that printed visualisations cannot fully replicate the scale or immersive experience that a viewer perceives on site. This inherent

limitation means that the visualisations may underrepresent certain perceptual effects or fail to capture the full extent of visual intrusion that could be experienced in reality.

Furthermore, the wireline drawings included within the panoramic projections share the same constraints as the accompanying photographic elements. These wireline images are not independent assessments but rather technical renderings integrated within the overall visualisation package. As such, they do not serve to correct or enhance the photographic representation but must be interpreted within the same limitations. This highlights the challenge in relying solely on these materials for a definitive understanding of the development's visual effects, suggesting that supplementary on-site assessments may be necessary to fully appreciate potential impacts.

In light of these considerations, while the visualisation materials provide a useful starting point for evaluation, their technical and perceptual limitations mean that conclusions drawn from them should be treated with caution. Decision-makers should weigh the visual evidence alongside other forms of assessment and recognise that the materials do not capture the full complexity of visual experience in the field. This balanced approach ensures that the potential impacts on visual amenity are neither overstated nor understated in the planning process.

The introduction of aviation and navigation lighting to a previously unlit sea horizon would result in a permanent alteration of the night-time seascape character for the entire 35-year operational life of the development. This change is not a minor or temporary effect; it would fundamentally alter the visual experience of the seascape during night hours. Furthermore, the 35-year operational timeframe does not mitigate the policy implications of this harm. Granting consent to this development effectively signifies an acceptance that this seascape is appropriate for wind farm use despite the permanent change in its night-time character. In conclusion, the impact of lighting on the seascape is significant and enduring, and any approval of the scheme must acknowledge the irreversible nature of this seascape transformation.

There remains significant uncertainty regarding the extent to which the proposal complies with the relevant planning policies designed to safeguard landscape and seascape interests. The effects identified engage several key provisions, including NPF4 Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively set a clear framework for the protection of nationally important natural assets, and any proposal must demonstrate consistency with their requirements.

However, the applicant has not satisfactorily demonstrated that its assessment of the scale of the accepted effects aligns with its own stated methodology. More importantly, there is an absence of clear evidence that the proposal meets the policy tests intended to preserve nationally significant landscapes and seascapes. In light of these shortcomings, the proposal does not convincingly comply with the statutory and policy safeguards in place, and as such, it should not be supported.

1.1.501 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of the effects on the setting of historic assets does not comply with the established methodology required for such evaluations, thereby undermining the reliability of its conclusions regarding heritage impacts. While the applicant adopts Historic Environment Scotland's recognised methodology, which mandates an evaluation of how changes to setting affect the contribution that setting makes to cultural significance and requires an assessment of whether the integrity of that setting is adequately retained, the methodology explicitly states that visual change should not be equated directly with adverse impact.

An independent Methodological Audit, based solely on the applicant's Appendix 14.3, reveals that although the operational assessment identifies relevant heritage attributes and describes visual change factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it fails to demonstrate the critical evaluative step of assessing the integrity of the setting as prescribed by the methodology. The Audit highlights that this essential analytical process is absent in all the examined worked examples, calling into question the validity of the applicant's conclusion that the integrity of setting is adequately retained.

The applicant's assessment risks underrepresenting the true impact on heritage assets by not fully capturing the broader cultural landscape and experiential qualities that contribute to their significance. This practical shortcoming could lead to an incomplete understanding of how the proposal might affect the heritage environment, particularly in terms of the lived experience and cultural narrative that these assets embody.

According to the applicant's own baseline, the cultural significance of the affected heritage assets arises from an array of interrelated qualities, including pilgrimage, arrival by sea, and movement through a living cultural landscape. This significance is not derived solely from isolated monuments or static viewpoints but from the dynamic relationships between monuments, spirituality, and the encompassing landscape and seascape. The heritage value is experienced through movement across the site rather than from fixed vantage points, emphasizing the importance of an assessment approach that embraces this fluid and interconnected character.

Furthermore, Historic Environment Scotland's consultation responses, as recorded within the application documentation, have explicitly requested the inclusion of additional viewpoints to ensure that these wider experiential and cultural qualities are properly represented in the assessment. The absence of these viewpoints and the wider landscape context in the applicant's evaluation could therefore result in a constrained and insufficient appraisal of heritage impacts, undermining the robustness of the planning process and the protection of cultural heritage.

The practical consequence of relying on the existing landscape assessment is that any understatement of landscape effects directly compromises the reliability of the heritage impact conclusions. If the landscape assessment fails to fully capture the extent or significance of visual or environmental changes, then the subsequent heritage evaluation, which depends upon those landscape findings, will similarly present an incomplete or diminished picture of the true effects on heritage assets. This interdependency means that the heritage conclusions cannot be viewed in

isolation but must be critically examined in the context of the preceding landscape analysis.

Furthermore, the heritage conclusions inherit the deficiencies present in the landscape assessment, leading to a systematic understatement of potential harm. Without an accurate and comprehensive landscape assessment, the evaluation of heritage impacts risks overlooking or downplaying adverse effects that may have material significance. Therefore, the credibility of the heritage impact conclusions is fundamentally undermined by the shortcomings in the landscape assessment, calling into question the robustness of the overall appraisal as it currently stands.

The applicant's submission engages directly with the requirements of NPF4 Policy 7, specifically subsection (h) concerning scheduled monuments and subsections (c) and (d) relating to their setting, as well as Policy GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. These policies collectively mandate the protection of the cultural significance of heritage assets, particularly those of international and national importance, alongside careful consideration of their surrounding context.

However, the applicant has failed to demonstrate that the cultural significance of these heritage assets and their settings will be adequately safeguarded. Moreover, the Scottish Ministers have not been provided with the necessary assessment to support any such conclusion. This absence of critical evidence undermines the application's compliance with key heritage protection policies and calls into question its overall acceptability.

1.1.502 Effects on Island Communities, Tourism and the Local Economy

The practical consequence of the proposed development is a direct threat to the fundamental economic and social sustainability of the island communities affected. These communities rely exceptionally heavily on visitors, whose presence underpins local businesses, services, and population stability. Any alteration to the qualities that draw visitors risks undermining the economic base upon which these islands depend.

The applicant's own baseline assessments identify the key attractions for visitors as the landscape, seascape, cultural heritage, tranquillity, and remoteness of the area. These elements are not peripheral; they constitute the very essence of what makes the islands appealing and viable as destinations. Diminishing or damaging these characteristics would inevitably lead to a decline in visitor numbers, with cascading effects on employment, local services, and community cohesion.

In summary, the proposal poses a significant risk to the viability of these island communities by threatening the qualities that sustain their visitor economy. Given the exceptional dependence of these islands on tourism drawn by these unique attributes, the development should be reconsidered to avoid jeopardising the long-term social and economic health of these communities.

The practical consequence of the applicant's flawed socio-economic assessment is a significant risk that the impacts on island communities will be misunderstood and inadequately mitigated. Despite the identification by the applicant's own consultants

that habitability represents a potentially significant pathway affecting these communities, no specific assessment of habitability on the affected islands was undertaken. Instead, Chapter 18 confines its analysis largely to regional-level considerations, focusing on port communities in detail while neglecting a place-based assessment of the island communities directly facing the proposed development. This gap results in the unsupported conclusion that these island communities possess low sensitivity to tourism effects.

Such a conclusion is fundamentally flawed because small island economies differ substantially from regional averages. Their economic structures are concentrated in sectors most vulnerable to changes in the qualities that attract visitors. Rather than diminishing sensitivity, dependence on increasing visitor numbers intensifies the risk to these communities by deepening their reliance on the very attributes potentially threatened by the proposal. Without a detailed, location-specific analysis, the assertion of low sensitivity amounts to an assumption, not an evidence-based finding.

In light of these points, the socio-economic assessment as presented fails to provide an adequate or reliable basis for understanding or mitigating impacts on island communities. Any decision-making premised on such an incomplete evaluation risks overlooking critical vulnerabilities, thereby undermining effective planning and protection of these sensitive island environments. It is essential that a thorough, place-based socio-economic assessment be undertaken to properly inform the planning process.

The proposal falls short in meeting the required planning and statutory standards for assessing and protecting island communities, particularly when measured against the obligations set out in GEN 19 and paragraph 4.81 of the National Marine Plan. These provisions mandate that decisions must be based on robust socio-economic evidence and adopt a precautionary approach where such evidence is insufficient. Furthermore, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 impose a clear duty to assess and give weight to the interests of island communities through meaningful engagement throughout the decision-making process. In contrast to these requirements, the applicant has failed to undertake the necessary detailed assessment to understand the specific effects of the proposal on island communities.

This deficiency is not a mere procedural oversight but a substantive failure to demonstrate compatibility with the sustainability of island communities or to discharge the statutory duties owed to them. The applicant’s recognition that island communities require particular scrutiny is not matched by the evidence or engagement provided. Without the appropriate assessment and meaningful consultation from inception to conclusion, the proposal cannot be deemed compliant with the statutory and policy framework designed to safeguard island communities. Consequently, the application should be regarded as non-compliant with essential planning policies and statutory duties.

1.1.503 Ecology, Biodiversity and Habitats Regulations

The proposed development site and its adjacent waters encompass Priority Marine Features and Annex I habitats, which are ecologically significant. Additionally, the

surrounding marine environment supports populations of seabirds, marine mammals, and basking sharks. Introducing large-scale construction, operational activities, and eventual decommissioning over several decades poses a substantial risk of significant adverse environmental impacts to these sensitive ecological resources.

The applicant's submission of a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan signifies an acknowledgement of potential adverse effects on the North Colonsay and Western Cliffs Special Protection Area, specifically concerning the guillemot population. Such documents are customarily prepared in circumstances where an adverse effect on site integrity cannot be definitively ruled out. This approach indicates that the applicant recognises the possibility that the Scottish Ministers may reach a different determination regarding adverse impacts than the applicant themselves. Consequently, these submissions serve as an important component of the application, intended to address and mitigate potential impacts under the relevant derogation provisions.

Under the Habitats Regulations, consent for developments affecting protected habitats and species may only be granted where the competent authority has ascertained that the proposal will not adversely affect the integrity of the protected site, unless the stringent derogation tests are satisfied. This requirement demands that no reasonable scientific doubt remains regarding the absence of such adverse effects. The onus of proof lies squarely with the applicant, who must provide robust evidence to meet this high evidential standard. Importantly, proposals for mitigation, compensation, or future monitoring alone cannot substantiate compliance with the statutory tests, underscoring the necessity for conclusive scientific certainty before consent can lawfully be given.

These legal obligations engage not only the Habitats Regulations but also specific policies within the National Marine Plan, notably GEN 9 and GEN 13, as well as Policies 3, 4(b), 4(e), and 4(f) of NPF4. This comprehensive policy framework reinforces the critical importance of safeguarding protected sites and species through rigorous assessment processes. Any development proposal must therefore demonstrate unequivocally that it will not compromise protected site integrity in order to secure consent, reflecting the stringent protections embedded within both statutory and planning policy regimes.

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

1.1.504 Cumulative and In-Combination Effects

There is significant uncertainty arising from the current approach to assessing the project, as only a portion is presently before the Scottish Ministers. Crucially, the export cable corridor and the onshore transmission works—integral components without which the wind farm cannot operate—are deferred to subsequent applications. Consequently, the comprehensive effects of the entire project are never evaluated together. Instead, key elements are left to be considered through later consenting processes after the principal decision has been made. This fragmented approach conflicts with established legal principles, notably affirmed by the courts in Raeshaw Farms, which require that a project be assessed in its entirety rather than being artificially divided into smaller parts whose individual impacts may appear less significant. Therefore, the current assessment methodology is legally and procedurally flawed, undermining the ability to conduct a thorough and coherent evaluation of the project's overall effects.

The mitigation measures proposed in the Environmental Impact Assessment rely heavily on baseline assessments that have been demonstrated to understate the extent of landscape, heritage, and socio-economic effects. This foundational understatement consequently limits the scope and effectiveness of any mitigation strategy, as the true magnitude of impacts is not fully recognised from the outset. Without an accurate baseline, proposed measures may fail to address the full range of adverse effects, thereby diminishing their overall efficacy and potentially allowing cumulative impacts to remain unchecked.

Furthermore, the cumulative impact assessment itself is rendered unreliable due to this flawed baseline. As the cumulative assessment depends on the findings of the earlier, understated evaluations, the combined effects of the current proposal alongside existing, consented, and foreseeable developments are similarly underestimated. This results in a cumulative impact appraisal that does not reflect the genuine scale of combined effects on the environment and local communities, undermining the robustness of the planning process and the protection of valued assets.

The applicant has failed to demonstrate that the cumulative and in-combination effects of the proposal have been reliably identified and assessed, contrary to the requirements set out in GEN 21 and paragraph 4.85 of the National Marine Plan, as well as NPF4 Policy 11(e) and the Environmental Impact Assessment Regulations concerning project splitting. This omission raises significant concerns regarding the adequacy of the environmental assessment and the potential for unaccounted adverse impacts arising from the proposal.

Furthermore, the absence of explicit consideration of the deferred works within the application undermines the ability to fully understand the project as a whole. The decision-making process must expressly address these deferred elements to ensure compliance with the stated policies and regulations. Without such clarity, there is a risk that the cumulative effects will be underestimated, potentially leading to environmental harm that could have been mitigated through comprehensive evaluation.

In light of these points, it is imperative that the determination of this application includes a thorough assessment of the deferred works and a reliable identification of

all cumulative and in-combination effects. Only with this information can the planning authority fulfil its statutory duties and ensure that the development proceeds in a manner consistent with relevant policy and regulatory requirements.

1.1.505 Public Engagement, Site Selection and Environmental Information

The applicant urges Scottish Ministers to accord significant weight to the site-selection process, thereby making the quality of public participation within that process a matter of direct relevance. However, there have been notable deficiencies in public engagement not only during the plan and site-selection stages but persisting into the current application phase. The application itself comprises several thousand pages of highly technical documentation. Compounding this complexity, the consultation period has coincided with the busiest months of the year for island communities, a time when local residents are heavily engaged in continuous work throughout the visitor season. This period also represents when access to specialist advice is at its lowest, placing an additional burden on those seeking to engage meaningfully. In contrast, the applicant has had years to prepare, backed by substantial professional and financial resources, highlighting a significant imbalance in the ability to participate effectively.

The National Marine Plan's policy GEN 18, alongside the principles of effective public participation enshrined in the Aarhus Convention, mandates that those affected by decisions of this magnitude must be afforded a realistic opportunity to engage. Unfortunately, the conditions under which the affected communities have had to respond fall well short of these established standards. This deficiency undermines the legitimacy of the consultation process and, by extension, the robustness of the site-selection exercise that the applicant wishes to emphasise. It is therefore imperative that Ministers take these shortcomings into careful consideration when evaluating the representations submitted, recognising the serious implications for the fairness and inclusivity of the decision-making process.

The practical consequence of the inadequacies in the Environmental Impact Assessment (EIA) is that the Scottish Ministers are currently unable to make a fully informed decision on the application. The environmental information provided does not meet the requirements of the EIA Regulations, which mandate that likely significant effects must be comprehensively understood before determination. This shortcoming directly affects the integrity and reliability of the decision-making process.

The application identifies potential pathways to significant environmental effects but fails to investigate them thoroughly. For example, the landscape assessment produces outcomes based on distance patterns not supported by its own stated methodology, while the heritage assessment does not demonstrate the application of its own integrity test. Furthermore, the socio-economic assessment lacks a place-based analysis of the affected islands, leaving critical contextual information absent. These methodological deficiencies undermine the sufficiency of the environmental evidence.

Additionally, the reliance on future assessments, post-consent plans, monitoring, and further approvals cannot substitute for a complete and robust EIA at this stage. The

Scottish Ministers must base their determination on the evidence presently before them, not on assumptions that unresolved matters will be satisfactorily addressed later. The applicant has not demonstrated that the environmental information submitted is adequate for this essential purpose, and therefore, the application should not be approved in its current form.

1.1.506 Effects on Local Area

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

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

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

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

The cultural and heritage impacts are also more profound than the applicant's evaluation suggests. Iona's monastic landscape, encompassing the Abbey, the Nunnery, and the high crosses, holds international significance, particularly linked to pilgrimage and arrival by sea. Although Historic Environment Scotland requested

additional viewpoints, including from the ferry crossing, the applicant has not provided visualisations from crucial locations such as the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn. This omission undermines a full understanding of the development's impact on the heritage setting, which is integral to the island's identity and visitor experience.

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

The applicant's assessment fails to adequately recognise the practical consequences of the proposed development on the coastal communities and landscapes of Mull and the Ross of Mull. Notably, Fionnphort—serving as the gateway to Iona and the embarkation point for visitors—is acknowledged by the applicant as being significantly affected. This community relies heavily on the flow of tourists, and any adverse visual or experiential impact here would have immediate economic repercussions. Similarly, significant effects are accepted at Erraid and along the Core Paths of the Ross, areas integral to both local identity and visitor experience, yet these impacts are not fully explored in terms of their wider community implications.

Across the island of Mull, the applicant concedes significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is categorised as having high sensitivity at distances of approximately 21 to 33 kilometres. Despite this, the applicant attributes only a medium magnitude of effect, which understates the true visual and environmental impact on this nationally designated landscape. This approach neglects the cumulative significance that such visual intrusions would have in a context recognised for its natural beauty and recreational importance.

Moreover, the assessment's treatment of the Wilderness and Gribun Rocks coastal area exemplifies an overreliance on distance-based reasoning. The applicant dismisses potential effects on this area—where viewing distances exceed 30 kilometres—by classifying the scale of change as small. This simplification ignores the fact that Mull's west-facing tourism economy, including wildlife boat operations and accommodation providers in its western townships, depends fundamentally on the integrity of the Atlantic seascape. The industrialisation of this seascape by the proposed development would harm these communities, none of which have received a place-based assessment to address their specific vulnerabilities. Taken together, these shortcomings indicate that the applicant's evaluation does not sufficiently

account for the significant visual, economic, and community impacts on Mull and the Ross of Mull.

The applicant's assessment acknowledges potential effects on designated landscapes within the Loch na Keal National Scenic Area, including Ulva, Staffa, Jura, and the Scarba, Lunga and the Garvellachs National Scenic Area, yet its conclusions understate the significance of these impacts. Ulva, a community-owned island at the outset of regeneration, shares fully in the effects on the National Scenic Area; its small, re-establishing community depends fundamentally on the unspoilt seascape and setting that the development threatens, yet no specific assessment has been undertaken for Ulva's unique circumstances. Staffa, situated approximately 35 kilometres from the development, lies beyond the 30-kilometre threshold recommended by NatureScot for assessing National Scenic Area qualities; notwithstanding the applicant's acceptance of the island's panoramic maritime qualities, it concludes that effects there would be small and not significant. Similarly, the Jura National Scenic Area, assessed at a distance of about 28 to 32 kilometres and of high sensitivity, is attributed only medium to low magnitude effects due to perceived mitigation by distance and retained landforms, despite its designation being founded on the wild and undeveloped character of its Atlantic outlook. The Scarba, Lunga and the Garvellachs National Scenic Area, located 35 to 40 kilometres away, is treated in the same manner. This approach collectively underestimates or omits significant effects on these important designated landscapes and fails to recognise the vulnerability of island communities such as Ulva, thereby undermining the protection of their natural and cultural qualities.

The applicant's assessment concludes a Low magnitude of change for the South Tiree coastal area despite recognising its High sensitivity at a distance of approximately 35 kilometres. This practical consequence is significant, as it directly informs the reliability of the overall evaluation of effects on Tiree's landscape. By attributing a Low magnitude of change, the assessment risks underrepresenting the actual scale of impact experienced by receptors on Tiree, which in turn undermines the credibility of any subsequent mitigation measures or planning decisions based on this evaluation.

Tiree's distinctive landscape character is fundamentally shaped by its exceptional low-lying topography and the dominance of sea and sky, with its highest elevation at Ben Hynish measuring a mere 141 metres. In this context, the introduction of turbines reaching up to 335 metres would present vertical elements unprecedented in the island's seascape. Given this stark contrast, the conclusion of a Low magnitude of change appears incongruous and insufficiently reflective of the visual and experiential effects on such a sensitive receptor. This suggests a severe understatement of impact that warrants reconsideration to ensure that the assessment accurately captures the scale and nature of landscape effects on Tiree.

The applicant's assessment overlooks significant effects on several mainland and island communities that have direct visual and economic connections to the seascape in question. For example, Gigha, a community-owned island renowned as a national symbol of island regeneration, faces the development waters from the east; yet, no examination has been made of how these impacts might affect its delicate community balance and local economy. Similarly, the west coast of Kintyre

comprises a series of communities whose identity and visitor economy are closely linked to the open Atlantic seaboard views towards Islay, Jura, and surrounding waters. These areas, along with the Treshnish Isles and other small islands and mainland coasts with views toward the development, have been excluded from any detailed consideration.

Furthermore, Ardnamurchan Point—the westernmost point of the British mainland—offers panoramic views along the Hebridean seaboard that attract visitors along the peninsula's length. Such seaward panoramas represent precisely the receptors that the applicant's distance-based moderation approach seeks to diminish, thereby undermining the robustness of the visual impact assessment. By failing to address these key receptors, the assessment compromises its comprehensiveness and risks underestimating the potential adverse effects on communities whose economies and cultural identities depend on the quality of their seascape environment.

The environmental impact assessment systematically underestimates the significance of effects on sensitive receptors located beyond approximately 20 kilometres from the development site. This finding arises from a consistent pattern in the applicant's methodology, where the magnitude of change experienced by these receptors is moderated and their effects discounted. Such an approach inherently diminishes the recognised sensitivity and importance of distant communities.

Crucially, this distance-based moderation results in the omission of any place-based assessment for the communities affected beyond this threshold. As a consequence, the lived experiences and concerns of these populations remain unaddressed within the assessment framework. This absence undermines the comprehensiveness and integrity of the environmental evaluation, which ought to fully account for all significant effects regardless of geographic distance.

In conclusion, reliance on an arbitrary 20-kilometre cut-off to moderate effects cannot be justified where highly sensitive receptors exist beyond this range. A thorough and place-specific assessment is essential to ensure that all significant impacts are appropriately identified and mitigated. Without such rigor, the assessment fails to meet the necessary standards of environmental scrutiny and public accountability.

1.1.507 Personal Observations

In addition to the planning matters above, I am personally concerned because: This will significantly affect the west coast of Scotland as we know it. It will destroy our small and vunerable communities for the greed of a massive company that will not even befit scotland

Based on my own local knowledge, I also wish to highlight that: The west coasts seas and scapes are already suffering flas it is a volatile and fragile environment

Finally, I would also ask the Scottish Ministers to consider: Take into account the voices of these communities. Represent them and their feelings like you have been voted to do, not overrule them for money

1.1.508 Summary

The proposal before the Scottish Ministers fails to demonstrate compliance with the relevant statutory and policy frameworks governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal region. However, published analyses of the applicant's documents reveal that these impacts have been materially underestimated. Crucially, the required heritage assessment has not been undertaken. Furthermore, although the effects on the island communities affected by the development were identified, no assessment of these impacts has been conducted. In addition, the proposal has not satisfactorily demonstrated that it meets the necessary ecological criteria. It is also important to note that only a portion of the project is currently subject to consideration by the Scottish Ministers.

Given these shortcomings, I respectfully urge that consent for the MachairWind Offshore Wind Farm be refused, alongside the associated marine licence. Should the Ministers be inclined to grant consent, I request that they require the submission of further environmental information and enhanced visualisations. Moreover, I advocate that the application should only be determined following a public inquiry, which would allow for a thorough examination of the issues raised in this objection. Regardless of the decision reached, I also request that the Scottish Ministers provide clear, reasoned conclusions addressing the effects on cultural heritage and on the island communities impacted by the proposal.

Yours faithfully,

[Redacted]

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

Member of the public 554
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, as detailed in application 00012385 seeking consent under section 36 of the Electricity Act 1989, and application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications, lodged by MachairWind Limited (a subsidiary of ScottishPower Renewables), relate to the construction of an offshore wind farm with an estimated capacity of approximately 2 gigawatts. The development would consist of between 91 and 144 turbines, each potentially reaching a maximum height of 335 metres to blade tip, situated within a designated Windfarm Development Area spanning about 448 square kilometres of marine environment. This area lies to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in close proximity to the southern Hebridean islands and their coastal communities.

I request that this objection be officially recorded and that I be notified of the final determination of these applications. The following sections outline the grounds for objection, framed within the statutory and policy context governing the decision-making process. It is important to emphasise that the onus lies squarely with the applicant to provide adequate and compelling evidence demonstrating that all relevant statutory tests and policy requirements are fully met. Objectors are not required to establish contrary proof. In this instance, the applicant has failed to discharge this burden of proof. Therefore, for the reasons detailed herein, the applications should be refused consent.

1.1.509 Seascape, Landscape and Visual Effects

The applicant’s evidence acknowledges that the proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration of the night-time seascape character throughout the stated 35-year operational life. This fundamental change would transform the visual experience of the seascape after dark, introducing new and continuous light sources where none presently exist.

Furthermore, the temporal limitation of 35 years does not mitigate the policy implications of this harm. Consent for the development would signify a policy judgement that the seascape is appropriate for wind farm use, thereby accepting the permanent alteration to its character. This recognition underscores the lasting significance of the lighting effects on the night-time seascape, beyond the operational timeframe.

The applicant’s evidence acknowledges that the proposed development’s effects engage several key policies, specifically National Planning Framework 4 (NPF4) Policies 4(c) and 4(d), 11(d) and 11(e), alongside GEN 7 and paragraph 4.28 of the National Marine Plan. These provisions are expressly designed to safeguard nationally important landscape and seascape interests, thereby establishing a clear policy framework against which the proposal must be assessed.

However, the applicant has failed to demonstrate that its conclusions regarding the scale of these acknowledged effects align with the methodology it has employed. This shortcoming undermines the reliability of its assessments and, critically, means that the proposal does not evidence compliance with the relevant planning policies protecting nationally important landscapes and seascapes. On this basis, the development cannot be considered consistent with established policy requirements and should not be supported.

1.1.510 Cultural Landscape, Archaeology and Historic Environment

The applicant's baseline assessment acknowledges that the cultural significance of the affected heritage assets extends beyond isolated physical features, encompassing a complex array of experiential qualities. These include the significance of pilgrimage routes, the historical arrival by sea, and the dynamic experience of movement through a living cultural landscape. The relationships between monuments, the spiritual associations they hold, and their integration within the surrounding landscape and seascape are central to the heritage value. Crucially, these elements are experienced not from fixed viewpoints but through continuous movement, highlighting the importance of understanding the heritage assets within their broader cultural and spatial context rather than as static or isolated features.

Historic Environment Scotland's consultation responses, as recorded within the application, reinforce this perspective by requesting additional viewpoints to ensure that these wider experiential and cultural qualities are fully represented. This indicates a recognition that the applicant's assessment, while comprehensive in certain respects, may not have adequately captured the full extent of the cultural landscape's significance. The omission of these wider viewpoints risks an incomplete understanding of how the heritage assets are perceived and valued in situ, potentially underrepresenting impacts on the cultural and spiritual dimensions integral to their heritage importance. In light of this, it is essential that any heritage impact assessment sufficiently encompasses these broader qualities to enable a fully informed planning decision.

1.1.511 Effects on Island Communities, Tourism and the Local Economy

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

The applicant's own consultants have acknowledged that habitability constitutes a potentially significant pathway by which the proposed development could affect island communities. Despite this recognition, no specific assessment of habitability for the affected islands was undertaken. Instead, the socio-economic assessment

presented in Chapter 18 focuses primarily on regional-level analysis, addressing potential impacts on port communities in detail while neglecting any comparable place-based evaluation of the island communities directly facing the development. This methodological choice culminates in the conclusion that these island communities exhibit low sensitivity to tourism-related effects.

Such a conclusion is fundamentally flawed because it treats small island economies as if they were mere averages within a broader region. In reality, these economies are highly concentrated in sectors that are most vulnerable to alterations in the qualities that attract visitors. The islands' dependence on increasing visitor numbers does not diminish their sensitivity to change; on the contrary, it intensifies their reliance on the very attributes that may be compromised by the proposal. Therefore, an assertion of low sensitivity, reached in the absence of detailed place-based analysis, cannot be regarded as evidence but rather as an unsubstantiated assumption.

In light of these considerations, the socio-economic assessment's failure to address the specific characteristics and vulnerabilities of the island communities represents a critical methodological deficiency. Without a robust, place-specific evaluation of habitability and tourism sensitivity, the assessment cannot be relied upon to understand or mitigate the full range of socio-economic impacts on these communities. Consequently, the assessment as it stands is inadequate, and the application should not be approved unless this significant shortcoming is remedied.

1.1.512 Ecology, Biodiversity and Habitats Regulations

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

1.1.513 Cumulative and In-Combination Effects

The current application before the Scottish Ministers addresses only a portion of the overall project, notably excluding the export cable corridor and the onshore transmission works, which are essential components without which the wind farm cannot function. Consequently, the environmental and planning effects of the entire development are not assessed collectively; instead, these significant elements are reserved for consideration under separate, subsequent consenting processes following the principal decision. This segmentation results in an incomplete evaluation of the project's full impact at the decision-making stage.

Such an approach conflicts with established legal principles, as emphasised in the Raeshaw Farms case, where the courts affirmed that a project must be appraised in its entirety rather than being fragmented into smaller parts whose individual effects may appear diminished. By deferring key components to later applications, the current assessment method effectively undermines comprehensive scrutiny, compromising the integrity and completeness of the planning process. This procedural flaw renders the present evaluation legally and procedurally unsound.

The practical consequence of relying on the cumulative assessments as presented is that the true combined effects of the proposed development, alongside other existing, consented, and foreseeable projects, are significantly underestimated. This underestimation arises directly from the baseline conditions established in the Environmental Impact Assessment, which have been shown to understate the effects on landscape, heritage, and socio-economic factors. As the cumulative assessment depends on these initial conclusions, any reduction in baseline impact assessments inevitably leads to a diminished understanding of overall cumulative effects.

Analytically, this means that the cumulative assessment does not provide a reliable or comprehensive evaluation of the development's total impact. By adopting a reduced baseline, the combined consequences fail to capture the full extent of change that would occur in the environment and community. This flaw undermines the robustness of the cumulative impact conclusions and suggests that decision-makers may not be fully informed about the scale and severity of the combined developments. Consequently, the assessment should be revisited with more accurate baseline data to ensure that cumulative effects are properly understood and addressed.

There remains significant uncertainty regarding the applicant's compliance with established planning policies and environmental regulations, particularly concerning project splitting and the assessment of cumulative effects. The proposal has not satisfactorily demonstrated adherence to GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), nor the requirements set out in the EIA Regulations. This lack of clarity undermines confidence that the cumulative and in-combination effects, both of the current proposal and the project as a whole, have been reliably identified and thoroughly assessed.

Given these unresolved issues, it is imperative that the decision-making process explicitly addresses how deferred works are to be treated. Without such consideration, there is a material risk that significant environmental impacts may be overlooked or underestimated. Therefore, I respectfully request that the determination expressly incorporates an assessment of the deferred elements to ensure full compliance with policy and regulatory frameworks.

1.1.514 Public Engagement, Site Selection and Environmental Information

The practical consequence of the inadequacies in the Environmental Impact Assessment (EIA) is that the Scottish Ministers are currently unable to make a fully informed decision on the application. The environmental information provided does not meet the requirements of the EIA Regulations, which mandate that likely

significant effects must be comprehensively understood before determination. This shortcoming directly affects the integrity and reliability of the decision-making process.

The application identifies potential pathways to significant environmental effects but fails to investigate them thoroughly. For example, the landscape assessment produces outcomes based on distance patterns not supported by its own stated methodology, while the heritage assessment does not demonstrate the application of its own integrity test. Furthermore, the socio-economic assessment lacks a place-based analysis of the affected islands, leaving critical contextual information absent. These methodological deficiencies undermine the sufficiency of the environmental evidence.

Additionally, the reliance on future assessments, post-consent plans, monitoring, and further approvals cannot substitute for a complete and robust EIA at this stage. The Scottish Ministers must base their determination on the evidence presently before them, not on assumptions that unresolved matters will be satisfactorily addressed later. The applicant has not demonstrated that the environmental information submitted is adequate for this essential purpose, and therefore, the application should not be approved in its current form.

1.1.515 Effects on Local Area

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

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

Community concerns further reinforce the inadequacy of the assessment. A household consultation on Iona found that 92 per cent of respondents object to the proposal, yet habitability—a pathway of potential effect identified by the applicant's own consultants—was never properly assessed. The perceived scale of the turbines is stark when compared to familiar landmarks: Ben Hynish on Tiree, at 141 metres high and visible from Iona at approximately 33 kilometres, would be overtopped by

the largest turbines by about 194 metres, at roughly two-thirds of that distance. This comparison underscores the overwhelming visual presence the turbines would have. Taken together, these factors demonstrate that the applicant's evaluation fails to adequately capture the scale and significance of the impacts on Iona, thereby compromising the integrity of the environmental and social impact assessment.

The applicant's assessment of the effects on Mull and the Ross of Mull coastal communities and landscapes underestimates the significant visual and economic impacts, particularly when compared to the mitigation measures proposed. While the applicant acknowledges significant effects at Erraid, on the Core Paths of the Ross, and at Fionnphort—the gateway to Iona and a vital community dependent on visitor flow—these acknowledgements appear insufficiently weighted in relation to the wider implications for the area. The Ross of Mull South coastal area is recognised as having High sensitivity at distances of approximately 22 to 24 kilometres, yet the attributed magnitude is only Medium. Similarly, across Mull itself, significant effects are accepted on Core Paths and within the Central, South, and West Mull Local Landscape Area, with the Loch na Keal National Scenic Area, noted for its High sensitivity between 21 and 33 kilometres, receiving no greater than a Medium magnitude rating. This comparative underestimation of effect magnitude suggests that the applicant's proposed mitigation may not adequately address the scale of impact on the communities and landscapes that are integral to the local tourism economy.

Moreover, the applicant's reliance on distance-based reasoning to minimise the perceived scale of change further undermines the robustness of the assessment. For instance, in the Wilderness and Gribun Rocks coastal area, the assessment discounts significant impact on the basis that the viewing distance exceeds 30 kilometres, judging the scale of change to be small. This approach fails to fully consider the cumulative and experiential nature of visual impact on a tourism-dependent region. Mull's west-facing tourism economy, which encompasses wildlife boat operations and the accommodation services of its western townships, fundamentally depends on the unspoiled Atlantic seascape that the proposed development would industrialise. Notably, none of these communities has received a place-based assessment that would capture the nuanced effects on their economic sustainability and community well-being. In light of these factors, the applicant's assessment inadequately addresses the significant visual, economic, and community impacts on Mull and Ross of Mull, warranting a more thorough and locally sensitive evaluation.

The applicant's assessment of the potential impacts on the wider seaboard designated landscapes and island communities appears to underestimate the significance of effects and omits critical considerations relating to vulnerable communities. While some mitigation measures are acknowledged, they do not fully address the specific sensitivities of these areas. For instance, Ulva, situated within the Loch na Keal National Scenic Area, is a community-owned island in the early stages of regeneration. Its recovery depends heavily on the preservation of its unspoilt seascape and setting, yet the applicant has failed to conduct any assessment of the effects on this small, re-establishing community.

Similarly, Staffa, also within the Loch na Keal National Scenic Area and recognised as one of the most celebrated small islands in Europe, lies approximately 35 kilometres from the development site. This distance exceeds the 30-kilometre range within which NatureScot requested that the qualities of National Scenic Areas be assessed. Despite this, the applicant concludes that the scale of change on Staffa would be small and the effect not significant, even though their own assessment acknowledges the island's panoramic maritime qualities. This inconsistency raises concerns about the adequacy of the evaluation.

Further designated landscapes such as the Jura National Scenic Area, assessed at 28 to 32 kilometres distance, are attributed only medium to low magnitude effects, primarily due to distance and retained landforms. However, Jura's designation relies on its wild and undeveloped Atlantic outlook, which may be more vulnerable to change than the assessment suggests. The Scarba, Lunga, and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres away, receive a similar treatment, which may similarly understate the potential impacts. Overall, the applicant's approach does not fully recognise the importance of these seascapes and island communities, thereby undermining the protection of their natural and cultural qualities.

The applicant's assessment significantly understates the magnitude of change and impact on Tiree's sensitive and distinctive landscape character, resulting in an unreliable evaluation of effects. Specifically, the South Tiree coastal area, which lies approximately 35 kilometres from the proposed development, is classified as having High sensitivity. Despite this, the applicant attributes only a Low magnitude of change to this receptor. This is inconsistent with the nature of Tiree's landscape, which is exceptionally low-lying and defined by the dominance of sea and sky. The island's highest point, Ben Hynish, rises merely 141 metres. In this context, turbines reaching up to 335 metres would introduce vertical structures unprecedented in Tiree's seascape, disrupting the open oceanic horizon that is fundamental to its character. Given this exposure and sensitivity, a Low magnitude conclusion is clearly a severe understatement, undermining the credibility of the overall impact assessment.

The applicant's assessment fails to consider the significant effects on a range of mainland and island communities directly overlooking the development site, thereby undermining the comprehensiveness of the environmental evaluation. Notably, Gigha, a community-owned island emblematic of island regeneration, faces the development waters from the east; yet, no examination has been conducted regarding the potential impacts on its delicately balanced community and economy. Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, commands extensive panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the receptors to which the applicant's distance-based impact moderation is inappropriately applied, leading to a material underestimation of effects. Additionally, the chain of communities along the west coast of Kintyre, whose outlook, character and visitor economies are intrinsically linked to the open Atlantic seaboard facing Islay, Jura and beyond, as well as the Treshnish Isles and adjacent mainland coasts with direct views of the proposed development, have been similarly overlooked. In light of these omissions, the assessment does not adequately account for the visual

and economic sensitivities of these receptor communities, rendering the evaluation incomplete and insufficiently robust. It is therefore imperative that these unassessed effects be properly addressed to ensure a thorough and credible appraisal of the development's impacts.

1.1.516 Summary

The proposal for the MachairWind Offshore Wind Farm has not been demonstrated by the applicant to comply with the relevant statutory and policy requirements governing its determination. The applicant's own assessments acknowledge significant impacts on nationally designated landscapes, as well as on the local communities and heritage along the coast. Furthermore, published analyses of the applicant's documents reveal that the extent of these impacts has been understated. Crucially, the necessary heritage assessment has not been undertaken. Although the effects on the island communities affected by the proposal were identified, they have never been subjected to proper evaluation. In addition, the ecological tests required by law have not been shown to be capable of being satisfied. It should also be noted that only a portion of the overall project has been submitted for consideration by the Scottish Ministers.

On these grounds, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to decline the associated marine licence application.

Should the Ministers decide not to refuse the application outright, I request that they require the submission of further environmental information and enhanced visualisations. Moreover, I contend that the applications should only be determined following a public inquiry, enabling a thorough examination of the issues raised in this objection. Regardless of the final decision, I also ask that the Ministers explicitly address and state their conclusions in their reasons, particularly concerning the impacts on cultural heritage and the affected island communities.

Yours faithfully,

[Redacted]

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

Member of the public 555
Dear Sir/Madam,

I hereby register my formal objection to the MachairWind Offshore Wind Farm proposals, submitted under application numbers 00012385 for consent pursuant to section 36 of the Electricity Act 1989, and 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. These applications, put forward by MachairWind Limited (ScottishPower Renewables), seek approval for a substantial offshore wind energy development.

The proposed project entails constructing an offshore wind farm with a generating capacity of approximately 2 gigawatts. The development would encompass between 91 and 144 turbines, each reaching heights of up to 335 metres to blade tip. The site is located within a designated Windfarm Development Area spanning roughly 448 square kilometres of sea situated north-west of Islay and west of Colonsay. This location lies approximately 21 kilometres from Iona and is in close proximity to various islands and coastal communities within the southern Hebrides.

My objection is grounded in detailed planning and environmental considerations, evaluated within the relevant statutory and policy frameworks that govern these applications. It is important to emphasise that the responsibility lies entirely with the applicant to provide sufficient evidence demonstrating that all relevant statutory and policy tests have been met. Objectors, such as myself, are not required to prove the contrary. Upon careful review, it is apparent that the applicant has failed to discharge this burden adequately. Consequently, the applications should be refused consent. I request that I be formally recorded as an objector and informed of the outcome of the decision-making process.

1.1.517 Conflict with National Planning Framework 4 and the Development Plan

The proposal under consideration fails to meet the impact criteria set out in NPF4 Policy 11, thereby undermining the policy's intended support for renewable energy development. NPF4 Policy 11 explicitly conditions such support on compliance with specific impact tests, including those addressing effects on communities under Policy 11(c), and impacts on landscape, seascape, and other receptors under Policies 11(d) and 11(e). The proposal's shortcomings in these areas are significant and quantifiable, as it would result in substantial adverse effects on nationally designated landscapes and seascapes. Furthermore, the evidence submitted does not satisfactorily demonstrate that the cultural significance of scheduled monuments and their settings would be preserved, nor does it establish that the interests of island communities would be adequately safeguarded. Additionally, the ecological assessments provided fail to confirm that the necessary environmental protections can be achieved.

These deficiencies collectively indicate a clear conflict with the impact criteria integral to NPF4 Policy 11. The policy's support for renewable energy is contingent upon meeting these criteria, which are designed to balance development with environmental and cultural conservation. Without satisfactory evidence to address these critical concerns, the proposal cannot be said to comply with the policy framework. Consequently, it is appropriate to conclude at this stage that the proposal

does not align with the requirements of NPF4 Policy 11, and therefore should not be supported in its current form.

The proposal must be considered in light of the suite of relevant policies within NPF4 designed to safeguard nationally important landscapes, heritage assets, and biodiversity. As outlined, Policy 11 operates alongside Policies 4(c) and 4(d), which specifically protect National Scenic Areas and other nationally significant landscapes from substantial adverse impacts on their defining qualities. In addition, Policy 7, including subsection (h), addresses the protection of scheduled monuments and their settings, while subsections (c) and (d) focus on the broader historic environment. Policy 3 further establishes requirements for biodiversity conservation. Together, these policies form a comprehensive framework aimed at preventing unacceptable harm to designated assets.

Upon detailed examination, the proposal fails to demonstrate compliance with these interrelated policy requirements. It would result in significant adverse effects on designated landscapes and seascapes, undermining the very qualities for which these areas are nationally recognised. Furthermore, there is an absence of sufficient evidence to confirm that the cultural significance of scheduled monuments and their settings would be adequately protected. The proposal also does not convincingly address the safeguarding of island communities, which are integral to the character and sustainability of these areas. Lastly, the ecological assessments submitted do not satisfy the necessary tests to confirm that biodiversity impacts can be appropriately mitigated or compensated.

In summary, the evidence presented establishes that the proposal conflicts with multiple NPF4 policies intended to protect designated assets of national importance. The significant adverse effects on landscapes and heritage assets, coupled with unresolved ecological and community safeguarding concerns, weigh against the proposal’s acceptability under the relevant planning framework. This conflict necessitates careful reconsideration to ensure alignment with the statutory objectives of NPF4.

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

1.1.518 Seascape, Landscape and Visual Effects

The applicant’s assessment methodology lacks clarity and consistency regarding the distance thresholds beyond which major effects are deemed to cease. Notably, the written methodology provided in Appendix 16.1 fails to specify any such threshold. However, an independent Evidence Note, which draws exclusively on the applicant’s Chapter 16 and Appendices 16.1 to 16.3, reveals a clear and consistent pattern

across all three assessment streams: no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of that receptor's inherent sensitivity or the extent of visibility. This indicates an implicit, yet unacknowledged, reliance on distance as a controlling factor in determining the scale of impact.

Further examination of the applicant's documents confirms the influence of distance in shaping these assessments. For example, an evaluation of a coastal area located over 30 kilometres from the development site concludes that the scale of change is small, explicitly citing the viewing distance as the rationale. Moreover, the Landscape Character synthesis categorises the magnitude of impact as High within roughly 20 kilometres, Medium between about 20 and 30 kilometres, and Low beyond approximately 30 kilometres for certain landscape types. This systematic moderation of magnitude at the distances where the most sensitive designated landscapes are situated suggests that the protective tests are applied to understated inputs. Consequently, the conclusions drawn do not reliably reflect the true effects that the Scottish Ministers are being asked to consider and consent to.

The proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration of the night-time seascape character for the duration of its 35-year operational life. This change would be significant, as the existing darkness of the seascape contributes to its natural character and visual amenity. The introduction of artificial lighting in this previously unlit environment would fundamentally transform the experience of the seascape during night-time hours.

Moreover, it is important to note that the 35-year operational period does not limit the extent of harm in policy terms. Granting consent for this development effectively signifies that the seascape is deemed suitable for wind farm use, with all the consequent impacts on its character and qualities. This policy implication underscores the weight of the decision, as it would set a precedent for the acceptability of such developments in this seascape.

In conclusion, the introduction of permanent lighting would cause a lasting and material change to the night-time seascape character, and consenting to the development would represent a policy judgment that this change is acceptable. This consideration should be central to the assessment of the proposal's compliance with seascape and visual impact policies.

The applicant acknowledges that the proposed development's effects engage several policies, specifically NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), GEN 7, and paragraph 4.28 of the National Marine Plan. However, the applicant has failed to demonstrate that its conclusions regarding the scale of these accepted effects align with its own assessment methodology. Moreover, there is a lack of evidence that the proposal complies with the policies designed to protect nationally important landscapes and seascapes. This deficiency undermines confidence in the applicant's assessment and indicates non-compliance with the relevant planning policies safeguarding landscape and seascape interests.

1.1.519 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment purports to follow Historic Environment Scotland's established methodology for evaluating effects on the setting of historic assets, a framework developed and refined through consultation with Historic Environment Scotland itself. This methodology mandates a thorough evaluation not simply of visual change but of whether such changes affect the contribution that the setting makes to the cultural significance of heritage assets and whether the integrity of that setting is adequately retained. Importantly, it explicitly states that visual change alone should not be equated directly with adverse impact, requiring a nuanced and evidence-based assessment beyond mere description of visibility or prominence.

However, an independent Methodological Audit, prepared to support community objections and based solely on the applicant's Appendix 14.3, reveals a critical shortfall in the operational assessment. While the applicant's report identifies relevant heritage attributes and details aspects such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it fails to demonstrate how the integrity of the setting has been assessed in accordance with the applicant's own accepted methodology. The required evaluative step—assessing the effect of changes on the contribution of setting to cultural significance and concluding whether integrity is retained—is absent in all examined worked examples. This omission fundamentally undermines the reliability of the applicant's conclusions regarding heritage impacts and calls into question the robustness and compliance of the assessment process undertaken.

While the applicant's assessment acknowledges certain baseline cultural qualities of the heritage assets, it falls short in fully capturing the broader experiential and landscape values essential to their significance. The baseline records identify key attributes such as pilgrimage, arrival by sea, movement through a living cultural landscape, and the interrelationships between monuments, spirituality, and the encompassing landscape and seascape. These qualities are inherently dynamic and are experienced through movement rather than fixed viewpoints. Historic Environment Scotland's consultation responses, as documented in the application, underscore this shortcoming by requesting additional viewpoints to ensure these wider cultural attributes are properly represented. Without adequately addressing these aspects, the assessment risks underestimating the true heritage impacts, thereby weakening the foundation for effective mitigation measures.

The heritage impact conclusions presented rely substantially on the underlying landscape assessment. As identified in the applicant's evidence, where the landscape effects have been understated, these deficiencies inherently carry through to the heritage conclusions derived from them. Consequently, the credibility of the heritage impact assessment is undermined by the initial understatement within the landscape evaluation. This interdependence indicates that any shortcomings in the landscape assessment directly affect the robustness of the heritage conclusions, warranting a cautious approach to their acceptance.

The application fails to comply with essential policy requirements designed to safeguard heritage assets, thereby undermining its overall acceptability. In particular, it does not demonstrate that the cultural significance of internationally and nationally important heritage assets and their settings will be adequately protected. Without this

assurance, the potential for irreversible harm to these irreplaceable resources remains unmitigated.

This shortfall directly engages several key policies, notably NPF4 Policy 7(h) concerning scheduled monuments, along with Policies 7(c) and 7(d) relating to their setting. It also involves GEN 6 and the specific guidance found in paragraphs 4.22 to 4.23 of the National Marine Plan. Together, these provisions establish a clear framework for heritage protection, which the application must meet to be considered acceptable.

Furthermore, the Scottish Ministers currently lack the necessary assessment to conclude that the proposal would protect these heritage assets effectively. Without such a comprehensive evaluation, it is not possible to confirm compliance with statutory heritage protection obligations. For these reasons, the application should be refused until it can properly demonstrate alignment with the relevant heritage policies.

1.1.520 Effects on Island Communities, Tourism and the Local Economy

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

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

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

The applicant's socio-economic assessment is fundamentally flawed in its failure to adequately consider the specific impacts on island communities. While the applicant's own consultants acknowledged habitability as a potentially significant pathway for effects, no detailed assessment of the habitability of the affected islands was undertaken. Instead, the assessment in Chapter 18 focuses predominantly on regional port communities and offers no equivalent place-based evaluation of the island communities directly facing the proposed development. Despite this omission, the assessment concludes that these island communities are of low sensitivity to tourism-related effects, a conclusion that lacks a sound evidential basis.

This approach overlooks the unique economic characteristics of small island communities. Such economies are not simply regional averages; they are typically heavily concentrated in sectors closely tied to the qualities that attract visitors. The reliance on increasing visitor numbers does not diminish their sensitivity to change; rather, it heightens their dependence on those very qualities that may be at risk from the development. By failing to undertake a place-based analysis, the applicant's conclusion of low sensitivity is not grounded in evidence but rests on an unsubstantiated assumption.

Given these significant methodological shortcomings, the socio-economic assessment cannot be relied upon to fully understand or mitigate the impacts on island communities. A thorough, place-specific evaluation is essential to properly assess the potential effects and to ensure that appropriate measures are in place to protect these vulnerable communities. In the absence of such analysis, the application should not be supported.

1.1.521 Ecology, Biodiversity and Habitats Regulations

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

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

In considering the applicant's approach to addressing potential adverse effects on protected sites, it is notable that they have submitted both a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan. These documents specifically target the guillemot population within the North Colonsay and Western Cliffs Special Protection Area, reflecting a recognition that the proposed development may pose risks to this designated habitat. Such submissions are conventionally prepared in circumstances where it cannot be definitively ruled out that the integrity of a protected site may be compromised, indicating a precautionary stance on the part of the applicant.

The presence of these documents within the application package serves as a significant feature, underscoring the applicant's awareness of the complexities involved in securing consent where protected species and sites are concerned. Importantly, these plans are framed as "Without Prejudice," suggesting that the applicant does not concede an adverse effect but acknowledges the possibility that the Scottish Ministers might assess the situation differently. This cautious approach allows for the consideration of derogation provisions under relevant conservation

legislation, which permit certain actions that might otherwise be prohibited, provided that appropriate compensation measures are implemented to offset any harm.

While the submission of derogation and compensation plans demonstrates a proactive attempt to mitigate potential impacts, it also raises questions about the certainty of the applicant's conclusions regarding adverse effects. The reliance on such documents reflects an understanding that the planning authority may not concur with the applicant's assessment of no significant harm. Consequently, these submissions should be carefully scrutinised to ensure that any proposed compensation is adequate, enforceable, and capable of maintaining the overall integrity of the protected area. It remains essential that the planning decision fully weighs these considerations in determining whether the application can be granted without undermining the conservation objectives of the site.

The applicant's submission falls short in demonstrating that the statutory tests designed to protect internationally important habitats and species are satisfied, as evidenced by their own derogation documents. These documents reveal a lack of sufficient certainty that the necessary legal criteria for permitting harm to protected ecological features can be met, thereby undermining the robustness of the mitigation measures proposed.

Given the high threshold set by the relevant statutory framework for safeguarding internationally significant ecological assets, the absence of demonstrable compliance with these tests weakens the justification for granting consent. Without clear and convincing evidence that all legal requirements have been fulfilled, the application cannot be considered compliant with the statutory protections afforded to these vital natural interests.

1.1.522 Cumulative and In-Combination Effects

The current assessment approach results in a fragmented evaluation of the project, with only a portion before the Scottish Ministers while critical components such as the export cable corridor and onshore transmission works are deferred to later applications. This means that the project cannot be operated as intended without these elements, yet their impacts are excluded from the initial decision-making process. Consequently, the practical effect is that the full range of environmental and operational consequences is never considered in a single, comprehensive assessment.

This piecemeal approach directly contravenes established legal principles, notably those affirmed by the courts in the Raeshaw Farms case. The courts have emphasised that a project must be assessed in its entirety rather than being divided into smaller parts, each of which may appear to have less significant effects when considered in isolation. By deferring important elements to subsequent consenting processes, the present method risks underestimating the cumulative impacts and undermines the integrity of the overall evaluation.

Therefore, it is imperative that the planning process requires a holistic assessment of all components essential to the operation of the wind farm before any determination is made. Assessing the project as a whole ensures compliance with legal precedents

and enables a robust, transparent, and informed decision. Without this comprehensive approach, the current assessment framework remains fundamentally flawed and fails to provide adequate scrutiny of the development's full implications.

There remains significant uncertainty regarding the reliability of the cumulative impact assessment, primarily because it relies on baseline evaluations that are themselves questionable. The Environmental Impact Assessment's underlying landscape, heritage, and socio-economic analyses have been shown to understate effects, as previously detailed. Consequently, any cumulative assessment that builds on these initial conclusions inevitably begins from a diminished baseline.

This foundational shortcoming means that the combined effects of the proposal, when considered alongside other existing, consented, and foreseeable developments, are similarly understated. Therefore, the cumulative impacts as presented do not provide a robust or accurate representation of the true extent of combined effects, calling into question the overall reliability of the assessment and the conclusions drawn from it.

1.1.523 Public Engagement, Site Selection and Environmental Information

The consultation period for this application, encompassing many thousands of pages of technical material, has been scheduled during the busiest months for island communities, coinciding with the continuous work demands of the visitor season. This timing has severely constrained the availability of specialist advice and the capacity of local residents to engage effectively, while the applicant has had years and substantial professional and financial resources to prepare its case. Such an imbalance has materially impaired meaningful public participation in both the plan and site-selection stages, an impact that persists into the current application phase.

The National Marine Plan's policy GEN 18 and the principles of effective public participation enshrined in the Aarhus Convention establish that those affected must have a realistic opportunity to influence decisions of this magnitude. The conditions under which the affected communities have been compelled to respond fall short of these essential standards. In light of these deficiencies, it is imperative that the Scottish Ministers carefully consider the legitimacy of the site-selection process and the representations made by local stakeholders when determining the weight to accord to public participation in this matter.

The Environmental Impact Assessment submitted with this application fails to provide sufficient information for the Scottish Ministers to make a fully informed decision. While the assessment identifies potential pathways to significant environmental effects across multiple topics, it does not investigate these impacts comprehensively. For example, the landscape assessment's conclusions rely on a distance-based pattern that is not supported by the methodology set out in its own documentation. Similarly, the heritage assessment lacks demonstrable application of its stated integrity test, and the socio-economic assessment omits any place-based analysis of the affected islands, undermining its robustness. Moreover, the applicant's dependence on future assessments, post-consent plans, ongoing monitoring, and subsequent approvals does not satisfy the requirements of the EIA Regulations, which mandate that likely significant effects must be understood prior to

determination. It is imperative that the Scottish Ministers base their decision on the evidence currently before them, rather than on assumptions that unresolved matters will be adequately addressed at a later stage. Given these deficiencies, the applicant has not demonstrated that the environmental information submitted is adequate for the purposes of this application.

1.1.524 Effects on Local Area

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

The applicant's own Coastal Character assessment acknowledges the Sound of Iona as an area of high sensitivity, with a direct orientation towards the proposed development. It identifies extensive visibility across a large geographical extent, approximately 21 kilometres, with turbines spanning about 39 degrees of the horizon. The assessment recognises moderate and significant overall effects, including impacts on the ferry crossing between Fionnphort and Iona. Similarly, the West Coast of Iona is described as highly sensitive with widespread visibility, and the applicant concedes significant effects for residents and visitors throughout much of the island, including at its highest point, Dùn Ì. These findings underscore the extensive visual intrusion that the development would impose upon Iona's landscape.

Beyond visual impacts, the applicant's baseline acknowledges the international importance of Iona's monastic heritage, including the Abbey, the Nunnery, and the high crosses, which derive significance from pilgrimage, arrival by sea, and movement through the landscape. Historic Environment Scotland requested additional viewpoints, such as from the ferry crossing itself; however, the applicant failed to provide visualisations from critical vantage points like the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn. Moreover, a household consultation revealed that 92 per cent of Iona residents object to the proposal, yet the applicant did not assess habitability, despite its identification as a potential pathway of effect

on the community. The perceived scale of the turbines can also be demonstrated by comparison with the familiar landmark of Ben Hynish on Tiree—141 metres high and visible from Iona at 33 kilometres—while the largest turbines would overtop Ben Hynish by approximately 194 metres at a closer distance of roughly two-thirds of that span. Taken together, these factors indicate that the applicant's assessment substantially underestimates the scale and significance of visual, community, and heritage impacts on Iona, thereby compromising the accuracy of the environmental and social impact evaluation.

The practical consequence of the applicant's assessment is a significant underestimation of the visual, economic, and community impacts on Mull and the Ross of Mull coastal areas. The Ross of Mull South coastal area, identified as of High sensitivity at distances of approximately 22 to 24 kilometres, is attributed only a Medium magnitude of effect. This is despite the applicant's acceptance of significant effects at Erraid, on the Core Paths of the Ross, and notably at Fionnphort—the gateway to Iona and critical embarkation point for visitors—where the community is directly tied to tourism flows. Similarly, across Mull, significant effects are acknowledged on Core Paths and within the Central, South, and West Mull Local Landscape Areas. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands and recognised as of High sensitivity at 21 to 33 kilometres, is nonetheless assessed at no more than Medium magnitude. This approach fails to fully reflect the cumulative and place-specific nature of the impacts.

Moreover, the applicant's reliance on distance as a primary determinant, exemplified by the treatment of the Wilderness and Gribun Rocks coastal area—where effects are judged small due to viewing distances exceeding 30 kilometres—demonstrates a simplistic methodology that inadequately captures the scale and character of change experienced locally. The applicant does not provide a place-based assessment for communities whose economies and identities are intimately linked to the Atlantic seascape, such as those dependent on tourism, wildlife boat operations, and accommodation in Mull's western townships. The proposed development's industrialising effect on this seascape is therefore insufficiently recognised, leaving a critical gap in understanding the broader community and economic consequences. It is essential that these factors be fully addressed to ensure a balanced and accurate evaluation of the project's impacts.

The applicant's assessment underestimates the practical consequences for several designated landscapes and island communities by excluding or downplaying significant effects. Ulva, located within the Loch na Keal National Scenic Area, is a community-owned island undergoing early-stage regeneration. This small, re-establishing community's recovery is intrinsically linked to the preservation of the unspoilt seascape and setting that the development would affect, yet no dedicated assessment of impacts on Ulva has been undertaken. Similarly, Staffa, also within the Loch na Keal National Scenic Area and renowned as one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development area—beyond the 30-kilometre limit suggested by NatureScot for assessing effects on National Scenic Area qualities. Despite acknowledging the island's panoramic maritime qualities, the applicant concludes that the scale of change would be small and the effect not significant, a position that risks overlooking the sensitivity and importance of this well-known landscape.

Further afield, the Jura National Scenic Area, situated about 28 to 32 kilometres from the development, is characterised by high sensitivity due to its wild, undeveloped Atlantic outlook, which forms the basis of its designation. The applicant attributes only a Medium to Low magnitude of impact here, citing factors such as distance, apparent scale, and retained landforms as justification for this moderation. The Scarba, Lunga, and Garvellachs National Scenic Area, lying approximately 35 to 40 kilometres away, is treated similarly, with potential effects minimised without detailed consideration of the cumulative or specific landscape qualities at stake. Taken together, these assessments suggest a pattern of insufficient recognition of the development's wider impacts on important seaboard designated landscapes and vulnerable island communities, thereby undermining the protection of their natural and cultural qualities.

The applicant's assessment recognises the South Tiree coastal area as having High sensitivity at a distance of approximately 35 kilometres, yet attributes only a Low magnitude of change to the effects of the proposed development. This evaluation appears inconsistent given the acknowledged sensitivity of the receptor and its considerable distance from the site.

Tiree's landscape is uniquely characterised by its exceptionally low-lying topography, with its highest point, Ben Hynish, reaching merely 141 metres. The island's defining features are the expansive sea and sky, presenting an open oceanic horizon. The introduction of turbines up to 335 metres in height would create vertical elements unprecedented in Tiree's seascape. Consequently, the applicant's conclusion of a Low magnitude of change in such an exposed and sensitive environment significantly understates the true extent of the impact, rendering the overall evaluation unreliable.

While the applicant's assessment applies distance-based moderation to mitigate perceived effects on seascape receptors, this approach overlooks significant impacts on mainland and island communities that have direct visual and economic connections to the development area. For instance, Gigha, a community-owned island renowned nationally for its regeneration, faces the development from the east; yet, the effects on its delicate community balance and local economy have not been examined. Similarly, Ardnamurchan Point—the westernmost tip of the British mainland—offers panoramic views along the Hebridean seaboard, attracting visitors throughout the peninsula. These seaward panoramas represent precisely the receptors that the distance-based mitigation seeks to moderate, calling into question the adequacy of such an approach. Furthermore, the chain of communities along the west coast of Kintyre, whose identity and visitor economy are closely tied to the open Atlantic seaboard facing Islay, Jura, and adjacent waters, along with the Treshnish Isles and other small islands and mainland coasts viewing the development area, have not been fully accounted for. Taken together, these omissions indicate that the applicant's assessment lacks the necessary comprehensiveness regarding the effects on these sensitive and economically reliant communities.

The applicant's reliance on a distance-based approach to assessing environmental effects results in a systematic underestimation of impacts on sensitive receptors located beyond 20 kilometres. This method moderates the magnitude of change and discounts the significance of effects simply due to their distance from the project,

leading to a practical consequence whereby substantial adverse impacts are effectively overlooked. Such an approach fails to provide a robust or accurate appraisal of the true extent of harm experienced by distant communities.

Critically, this approach means that communities beyond the 20-kilometre threshold have not been subject to any place-based assessment, despite potentially experiencing significant effects. The absence of site-specific evaluation undermines the integrity of the environmental impact assessment and disregards the lived experience of these populations. Without a thorough, locally grounded analysis, the assessment cannot be relied upon to inform decision-making adequately or to protect the interests of all affected parties.

Therefore, it is essential that the assessment methodology be revised to recognise and properly evaluate the effects on sensitive receptors regardless of distance. Only through a more comprehensive and nuanced approach can the environmental impact assessment fulfil its purpose of accurately identifying and mitigating harm, thereby ensuring a fair and transparent planning process.

1.1.525 Personal Observations

Based on my own local knowledge, I also wish to highlight that: I believe that the presence and protetion of the seabird colonies of the area of the proposed wind farm should recieve greater consideration, and is a reason not to construct the wind farm in this area.

1.1.526 Summary

The proposal for the MachairWind Offshore Wind Farm fails to demonstrate compliance with the relevant statutory and policy requirements governing its determination. The applicant’s own assessments acknowledge significant impacts on nationally designated landscapes, as well as on the cultural heritage and communities along this coastline. However, the published analyses of the applicant’s documentation reveal that these impacts have been understated. Crucially, the necessary heritage assessment has not been undertaken, and the identified effects on the island communities affected by the development have not been properly evaluated. Furthermore, the ecological considerations imposed by statutory tests have not been shown to be achievable. It is also pertinent to note that the submission before the Scottish Ministers represents only a portion of the overall project.

Given these substantial deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to decline the associated marine licence. Should the Ministers consider an alternative course, I request that they require the provision of further environmental information, including improved visualisations, and that determination of the applications be deferred until after a public inquiry. Such an inquiry would allow for a thorough examination of the issues raised within this objection. Regardless of the decision ultimately reached, I further request that the Scottish Ministers explicitly address and record their conclusions on the impacts to cultural heritage and the affected island communities within their decision-making rationale.

Yours faithfully,

[Redacted]

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

Member of the public 556
Dear Sir/Madam,

I hereby register a formal objection to the MachairWind Offshore Wind Farm proposals, submitted under application numbers 00012385 for consent pursuant to section 36 of the Electricity Act 1989, and 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. These applications, lodged by MachairWind Limited (ScottishPower Renewables), seek approval for an offshore wind energy development with an installed capacity of approximately 2 GW. The project envisages the installation of between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip, situated within a designated Windfarm Development Area that spans roughly 448 square kilometres of marine environment. This area lies to the north-west of Islay and west of Colonsay, approximately 21 kilometres from the island of Iona and in close proximity to the southern Hebrides' islands and coastal communities.

The following submission articulates the grounds for objection based on planning and environmental considerations, referencing the statutory and policy frameworks governing the determination of these applications. It is important to emphasise that the onus of proof rests firmly on the applicant to demonstrate, with robust and adequate evidence, that all relevant legal and policy tests are met. Objectors are not required to provide evidence disproving the proposals. Upon examination, it is evident that the applicant has failed to satisfy this evidential burden. Consequently, the proposals do not comply with the applicable tests and therefore consent should be withheld. I request that this letter be formally recorded as an objection, that I be registered accordingly, and that I receive notification of the decision reached on these applications.

1.1.527 Legislative and Policy Framework

The application fails to demonstrate adequate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989, which require the applicant to have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant must take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The evidence provided does not sufficiently address these requirements, leaving significant uncertainty as to whether these statutory duties have been properly considered or fulfilled.

Given that the Scottish Ministers are also required to have regard to these same statutory duties in determining the application, the failure to demonstrate compliance or to provide adequate evidence of mitigation measures constitutes a material deficiency. Where such compliance has not been demonstrated, or where evidence identifies omissions or conflicts with the applicable legal and policy framework, these matters weigh decisively against the granting of consent. Accordingly, the application should be refused on the basis that it does not meet the statutory obligations under Schedule 9 of the Electricity Act 1989.

The marine licence application is subject to determination under Part 4 of the Marine (Scotland) Act 2010 and must be assessed in accordance with Scotland's National Marine Plan unless relevant considerations indicate otherwise. The statutory framework requires that the proposal complies with a range of General Policies, notably GEN 4 on Co-existence, GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 and paragraph 4.85 addressing Cumulative Impacts. These policies collectively form an integral part of the statutory assessment process for the application.

However, the application fails to demonstrate compliance with these statutory requirements and relevant policies of the National Marine Plan. The evidence identifies deficiencies and omissions in the submission, including inadequate consideration of cumulative impacts and insufficient engagement as required by GEN 18. Furthermore, the application does not provide sound evidence to satisfy the requirements of GEN 19, nor does it adequately address potential effects on the historic environment and landscape designations as stipulated in GEN 6 and GEN 7. These shortcomings represent clear conflicts with the applicable legal and policy framework.

Given these unresolved deficiencies and the absence of demonstrated compliance, the application does not meet the statutory criteria for authorisation under the Marine (Scotland) Act 2010 and the National Marine Plan. In accordance with the established legal position, such failures weigh decisively against the granting of consent for the proposed marine licence. Therefore, the application should be refused on these grounds.

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

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

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

demonstrated compliance or effective mitigation, these matters weigh against the granting of consent for the proposal. The application, therefore, should be refused on the basis of its failure to meet the requirements of National Planning Framework 4.

The applicant has failed to provide an adequate Environmental Impact Assessment (EIA) and Habitats Regulations Assessment (HRA) as required by law. Under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, it is mandatory that the likely significant environmental effects of the proposal be identified, assessed, and reported prior to any determination. This statutory requirement has not been met in the current submission. Furthermore, the Habitats Regulations impose a legal obligation to assess the effects of the proposal on European protected sites in accordance with the applicable statutory tests. The evidence before the determining authority does not demonstrate compliance with these requirements. The absence of a satisfactory EIA and HRA constitutes a clear deficiency and omission in the application. Such failures conflict directly with the applicable legal and policy framework governing environmental protection and habitat conservation. In accordance with established legal principles, where compliance with these statutory assessments has not been demonstrated, these shortcomings must weigh against the granting of consent. Therefore, on the basis of the inadequate environmental and habitats assessments, the proposal should not be approved.

The proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018, resulting in a fundamental procedural and substantive deficiency. This statutory requirement is clear: the interests of island communities must be explicitly taken into account and given due weight throughout the decision-making process. The absence of demonstrated compliance with this obligation undermines the legitimacy of the proposal and its conformity with the legal framework governing development affecting island areas.

The evidence confirms that the application does not meet the standards set by the Islands (Scotland) Act 2018. There is a lack of adequate assessment or meaningful engagement with the specific needs, characteristics, and priorities of the island communities impacted by the development. Such omissions constitute a failure to satisfy the statutory duty, which is not a mere procedural formality but a substantive requirement designed to protect the unique social, economic, and environmental interests of island populations. This failure is a material consideration that weighs decisively against the granting of planning consent.

In accordance with established legal and policy principles, where compliance with the Islands (Scotland) Act 2018 has not been demonstrated, or where evidence reveals deficiencies or omissions in addressing island community interests, these shortcomings must be regarded as significant and determinative. The proposal’s disregard for this statutory duty conflicts with the applicable legal and policy framework and therefore should be refused consent. Granting permission in these circumstances would set a precedent that undermines the statutory protections afforded to island communities and contravenes the clear legislative intent of the Islands (Scotland) Act 2018.

The applicant has failed to meet the fundamental responsibility of demonstrating compliance with all relevant legal and policy requirements through robust, objective, and proportionate evidence. This evidential burden is essential to satisfy every applicable statutory duty, planning policy, and environmental assessment requirement. The absence of such comprehensive demonstration undermines the legitimacy of the application and precludes any assumption that the proposal aligns with the necessary frameworks.

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

1.1.528 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to comply with the impact criteria set out in National Planning Framework 4 (NPF4) Policy 11, thereby undermining the policy's intended support for renewable energy development. Although NPF4 Policy 11 endorses renewable energy projects, this support is expressly conditional upon adherence to its impact criteria, including Policy 11(c) relating to impacts on communities, as well as Policies 11(d) and 11(e) concerning effects on landscape, seascape, and other receptors. A detailed examination reveals that the proposal would result in significant adverse effects on nationally designated landscapes and seascapes. Furthermore, the applicant has not demonstrated that the cultural significance of scheduled monuments and their settings would be adequately protected, nor that the safeguarding of island communities would be ensured. In addition, the ecological assessments submitted do not provide sufficient evidence to conclude that the necessary ecological tests can be satisfied. Taken together, these shortcomings indicate a clear conflict with the impact criteria of NPF4 Policy 11, calling into question the acceptability of the development as currently proposed.

The proposal fails to demonstrate that mitigation measures would adequately address the significant adverse effects identified, thereby conflicting with several key policies within NPF4 that protect designated assets. Policy 11 operates in conjunction with Policy 4(c) and 4(d), which safeguard National Scenic Areas and nationally important landscapes from substantial harm to their defining qualities. Additionally, Policies 7 and 3 require the protection of scheduled monuments and their settings, alongside biodiversity interests. The evidence clearly indicates that the proposal would cause significant adverse effects on nationally designated landscapes and seascapes. Furthermore, it has not been shown that the cultural significance of scheduled monuments and their settings would be preserved. The safeguarding of island communities has also not been demonstrated, and the ecological criteria outlined in Policy 3 remain unmet based on the evidence submitted. In light of these considerations, the proposal does not comply with the relevant NPF4 policies aimed at conserving nationally important natural, historic, and ecological assets.

There remains significant uncertainty regarding the proposal's compatibility with the terrestrial development plan framework, particularly the Argyll and Bute Local Development Plan 2. The evidence clearly indicates that the development would have adverse effects on the landscape, heritage, and community interests that these policies are designed to protect, raising concerns about its appropriateness within the established planning context.

In light of these conflicts, the proposal is fundamentally at odds with both the relevant development plan and the National Planning Framework 4 when considered in its entirety. Crucially, the applicant has not provided sufficient demonstration to overcome these inconsistencies. Therefore, on balance, the proposal cannot be supported within the current planning policy framework.

1.1.529 Seascape, Landscape and Visual Effects

The practical consequence of the applicant's assessment methodology is a systematic understatement of the potential effects on the most sensitive designated landscapes, which are often located beyond 20 kilometres from the development area. This underrepresentation arises because the methodology does not explicitly define any distance threshold beyond which major effects cease. Nevertheless, an independent Evidence Note, drawing solely on the applicant's own Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern: no highly sensitive receptor situated beyond approximately 20 kilometres is attributed the highest magnitude of change, regardless of its sensitivity or the extent of its visibility to the development.

Further scrutiny of the applicant's documentation confirms the influence of distance on effect magnitude judgements. For instance, a coastal area more than 30 kilometres from the site is assessed as experiencing only a small scale of change due to the viewing distance. Moreover, the Landscape Character synthesis categorises magnitude of change as High within roughly 20 kilometres, Medium between approximately 20 and 30 kilometres, and Low beyond about 30 kilometres for certain landscape types. This gradation clearly demonstrates a built-in moderation of impact severity correlated with distance, which may not fully capture the true sensitivity and experiential quality of landscapes at these outer distances.

Consequently, the protective tests designed to safeguard landscape and visual amenity are being applied to inputs that systematically diminish the perceived magnitude of effects at the critical distances where the most sensitive designated landscapes are situated. As a result, the conclusions drawn by the applicant do not provide a reliable or comprehensive description of the effects on these landscapes. This undermines the decision-making process by Scottish Ministers, who are therefore being asked to consent based on an incomplete and potentially misleading assessment of impact.

The applicant's submission incorporates NatureScot's visualisation guidance, which explicitly recognises inherent constraints in the visual materials presented. This guidance notes that printed visualisations are unable to fully replicate the scale perceived by a viewer on site, acknowledging a fundamental limitation in accurately conveying the true visual experience through such media. Furthermore, the wireline

drawings included within the panoramic projections share these limitations as they are intrinsically linked to the photographic content they accompany.

It is important to understand that these wireline drawings function as technical renderings embedded within the visualisations rather than serving as independent tools to correct or enhance the photographic representation. Consequently, their value is confined by the same perceptual and technical restrictions as the photographs, limiting their ability to provide an entirely objective or comprehensive view of the proposed development's visual impact.

Given these constraints, the visual evidence must be considered with an awareness of its limitations. While it remains a valuable component of the assessment, the inherent technical and perceptual shortcomings mean that it cannot be relied upon in isolation to fully inform judgements regarding the development's visual effects. A balanced approach, incorporating this understanding, is therefore necessary when evaluating the material presented.

The introduction of aviation and navigation lighting associated with the proposed development would permanently alter the night-time character of the currently unlit sea horizon for the entire 35-year operational period. This change is not merely a temporary effect limited to the lifespan of the development; rather, consenting to this proposal effectively acknowledges that the seascape is appropriate for wind farm use, with all attendant visual and environmental implications. Such a decision sets a precedent for the acceptability of lighting impacts in this sensitive seascape, fundamentally changing its character in a manner that should be carefully weighed against relevant policy considerations.

The applicant acknowledges that the proposed development's effects engage several key policies, including NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. However, the applicant has not demonstrated that its conclusions regarding the scale of these accepted effects align with its own stated methodology. Furthermore, there is a failure to show compliance with the policies designed to protect nationally important landscapes and seascapes. This lack of clear evidence and adherence to policy requirements indicates that the proposal does not meet the necessary standards set out for safeguarding these valued environmental interests.

1.1.530 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment fails to adequately capture the broader cultural landscape and experiential qualities that contribute to the significance of the affected heritage assets, which has practical implications for the accuracy and completeness of the heritage impact evaluation. According to the applicant's own baseline, the cultural significance of these assets is intrinsically linked to dynamic qualities such as pilgrimage routes, arrival by sea, and movement through a living cultural landscape. These include the relationships between monuments, spirituality, and the surrounding landscape and seascape, with their full value experienced through movement rather than static viewpoints. Despite this, Historic Environment Scotland's consultation responses—documented within the application—expressly requested additional viewpoints to ensure these wider qualities were properly

represented, indicating that the original assessment was insufficient in scope. Therefore, without a comprehensive consideration of these experiential and relational aspects, the assessment risks underestimating the heritage impacts. It is essential that these broader cultural dimensions are fully integrated into the evaluation to provide an accurate and robust understanding of potential effects on heritage significance.

1.1.531 Effects on Island Communities, Tourism and the Local Economy

The proposal poses a significant threat to the fundamental economic and social sustainability of the island communities affected. These communities rely exceptionally heavily on visitors who are attracted specifically by the qualities identified in the applicant's own baseline assessments: landscape, seascape, cultural heritage, tranquillity and remoteness. Any changes to these defining attributes will strike directly at the economic foundation of these communities. This impact extends beyond immediate visitor numbers to undermine essential local services, reduce population stability, and jeopardise the long-term viability of the islands themselves.

The applicant's failure to assess the habitability of the affected islands has practical consequences that undermine confidence in the socio-economic conclusions presented. While their own consultants identified habitability as a significant potential impact pathway, the subsequent assessment in Chapter 18 addresses only regional port communities in detail, neglecting any comparable place-based analysis of the island communities directly facing the proposed development. This approach results in an unsupported conclusion that these island communities exhibit low sensitivity to tourism effects, which risks overlooking specific and localized vulnerabilities.

This methodological flaw is particularly concerning given the unique economic characteristics of small island communities. Their economies are concentrated in sectors highly sensitive to changes in the qualities that attract visitors, and increased dependence on visitor numbers intensifies this sensitivity rather than diminishes it. The absence of a detailed, place-based assessment renders the conclusion of low sensitivity not as evidence-based but as an unsubstantiated assumption. Therefore, the socio-economic assessment as presented is insufficient to understand or mitigate the potential impacts on island communities.

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

The applicant acknowledged that island communities require particular scrutiny; however, they failed to undertake the necessary assessment to understand the proposal's potential effects on these communities. As a result, there is no

demonstration that the development is compatible with the sustainability of island communities. This omission represents a significant shortcoming in addressing the socio-economic implications and risks posed to these populations.

In conclusion, the statutory duties owed to island communities have not been discharged, and the proposal does not demonstrate compliance with the relevant planning policies. Given these deficiencies, the proposal cannot be considered acceptable in its current form. It is therefore respectfully requested that it be refused on the grounds of non-compliance with policy and statutory obligations regarding the protection of island communities.

1.1.532 Cumulative and In-Combination Effects

There is significant uncertainty arising from the current approach to assessing the project, as only a portion is presently before the Scottish Ministers. Crucially, the export cable corridor and the onshore transmission works—integral components without which the wind farm cannot operate—are deferred to subsequent applications. Consequently, the comprehensive effects of the entire project are never evaluated together. Instead, key elements are left to be considered through later consenting processes after the principal decision has been made. This fragmented approach conflicts with established legal principles, notably affirmed by the courts in Raeshaw Farms, which require that a project be assessed in its entirety rather than being artificially divided into smaller parts whose individual impacts may appear less significant. Therefore, the current assessment methodology is legally and procedurally flawed, undermining the ability to conduct a thorough and coherent evaluation of the project’s overall effects.

The practical consequence of the flawed baseline assessments is that the cumulative impact assessment is fundamentally unreliable and significantly underestimates the true combined effects of the proposed development alongside other existing, consented, and foreseeable projects. This is because the cumulative assessments rely directly on conclusions drawn from the initial Environmental Impact Assessment. When the underlying evaluations of landscape, heritage, and socio-economic factors understate the effects, as previously demonstrated, the cumulative assessment inevitably adopts this reduced baseline. Consequently, the overall combined impacts are understated, leading to a distorted understanding of the proposal’s full implications when considered in conjunction with other developments.

The applicant has failed to demonstrate that the cumulative and in-combination effects of the proposal, including the full scope of the project, have been reliably identified and assessed, contrary to the requirements set out in GEN 21 and paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the EIA Regulations concerning project splitting. This omission undermines the integrity of the environmental impact assessment process and prevents a comprehensive understanding of the potential effects. It is therefore essential that the treatment of the deferred works be explicitly considered and addressed within the determination to ensure compliance with relevant planning policies and regulatory obligations. In conclusion, without this explicit consideration, the proposal does not meet the necessary standards for informed decision-making and should not be approved in its current form.

1.1.533 Public Engagement, Site Selection and Environmental Information

The applicant places significant weight on the site-selection process, which renders the quality of public participation within that process directly material to the decision. However, deficiencies in public participation identified during the plan and site-selection stages have persisted into the application stage. The application itself comprises many thousands of pages of technical material, submitted during the busiest months of the year for island communities. This period coincides with the visitor season, when local residents are engaged continuously in work and specialist advice is least accessible. In contrast, the applicant has had years to prepare its case, supported by substantial professional and financial resources.

The requirements set out in GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, mandate that those affected must be afforded a realistic opportunity to participate in decisions of such magnitude. The circumstances under which the affected communities have been expected to respond fall short of this standard. This shortfall undermines the legitimacy of the consultation process and should be given careful consideration by the Scottish Ministers when evaluating the representations submitted.

1.1.534 Effects on Local Area

The applicant's assessment acknowledges that the Sound of Iona holds high sensitivity, with direct orientation towards the proposed development area and extensive visibility. The Coastal Character assessment identifies a large geographical extent of change, noting effects on the ferry crossing between Fionnphort and Iona, with an overall effect described as moderate and significant. The turbines would be visible across approximately 39 degrees of the horizon, at a distance of about 21 kilometres. Similarly, the West Coast of Iona is recognised as highly sensitive, with widespread visibility, and the applicant accepts significant effects on residents and visitors across much of the island, including at Dùn Ì, its highest point.

However, this acknowledgement understates the scale and significance of the impacts. Iona's monastic landscape, which includes the Abbey, the Nunnery, and the high crosses, is of heritage importance at an international level. The applicant's own baseline recognises the significance of this heritage in terms of pilgrimage, arrival by sea, and movement through the landscape. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet the applicant has failed to provide visualisations from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, a crucial vantage point for assessing heritage impact.

Community concerns further highlight the inadequacy of the applicant's evaluation. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal. Despite this, habitability—identified by the applicant's consultants as a potential pathway of effect on the community—was never formally assessed. This omission undermines the accuracy and completeness of the social impact evaluation.

The perceived scale of the turbines is also underestimated. For comparison, Ben Hynish on Tiree, standing 141 metres high and visible from Iona at approximately 33 kilometres, would be overtopped by the largest turbines by around 194 metres, despite the turbines being located roughly two-thirds of that distance from Iona. This illustrates that the visual dominance of the turbines would be substantially greater than implied.

In conclusion, the applicant's assessment significantly underrepresents the visual, community, and heritage impacts on Iona, compromising the reliability of the environmental and social impact evaluation and warranting a more thorough and robust analysis.

1.1.535 Personal Observations

In addition to the planning matters above, I am personally concerned because: As someone planning on moving and establishing a business on the islands I am horrified to hear of these plans which will greatly impact all local communities and future visitors to this treasured place!

1.1.536 Summary

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

In light of these deficiencies, I respectfully urge the Scottish Ministers to decline consent for the MachairWind Offshore Wind Farm and to refuse the accompanying marine licence. Should the Ministers be inclined to grant consent, I request that they require the provision of further environmental information and enhanced visual representations. Furthermore, I recommend that determination of the applications be deferred until after a public inquiry, thereby ensuring a thorough examination of the concerns outlined in this objection. Regardless of the outcome, I also seek a clear and explicit statement within the Ministers' decision explaining their conclusions regarding the impacts on cultural heritage and the affected island communities.

Yours faithfully,

[Redacted]

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

Member of the public 557
Dear Sir/Madam,

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

This objection is grounded in both planning and environmental considerations, evaluated against the relevant statutory provisions and policy guidance that govern the determination of such applications. It is important to emphasise that the onus lies with the applicant to provide compelling and adequate evidence demonstrating compliance with all applicable legal and policy tests. Objectors, conversely, bear no obligation to prove contrary positions. Upon careful review, it is apparent that the applicant has failed to meet this evidential burden. Consequently, it is my clear position that the applications should not be granted consent.

I request that this correspondence be formally recorded as an objection, that my status as an objector be duly noted, and that I receive notification of the final decision regarding these applications.

1.1.537 Seascape, Landscape and Visual Effects

There is a fundamental uncertainty regarding the applicant’s assessment methodology, particularly in relation to how distance thresholds are treated. Notably, the written methodology in Appendix 16.1 does not specify any distance beyond which major effects are considered to cease. However, an independently prepared Evidence Note, drawing solely from the applicant’s Chapter 16 and its appendices, reveals a consistent pattern: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of its sensitivity or visibility.

Further examination of the applicant’s own documents underscores the influence distance has on their judgements. For instance, an assessment of a coastal area over 30 kilometres away explicitly states that, given the viewing distance, the scale of change is judged to be small. Additionally, the Landscape Character synthesis categorises magnitude of effect as High within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. This demonstrates a clear, though implicit, distance-related grading of impact severity.

The implication of this approach is that the protective tests required by Scottish Ministers are being applied to inputs that are systematically understated. When

magnitude is moderated precisely at distances where the most sensitive designated landscapes are located, the resulting conclusions cannot be regarded as a reliable description of the effects for which consent is sought. This raises significant concerns about the robustness and accuracy of the assessment on which the decision-making process depends.

The applicant relies on NatureScot's visualisation guidance, which explicitly recognises that printed visualisations cannot fully capture the scale perceived by a viewer in the field. Furthermore, the wireline drawings included within the panoramic projections inherit the same limitations as the accompanying photography; they constitute technical renderings within the visualisation rather than independent corrections to it. This inherent constraint means that any visual evidence must be understood as a representation with acknowledged perceptual and technical boundaries, underscoring the need for cautious interpretation in the planning assessment.

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

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

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

The applicant's evidence acknowledges that the proposal's effects engage several key policies designed to safeguard landscape and seascape interests. Specifically, these effects relate to National Planning Framework 4 (NPF4) Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. This recognition indicates that the proposal falls within the scope of established policy measures intended to protect nationally important landscapes and seascapes from adverse impacts arising from development activities.

However, despite this acknowledgement, the applicant has not demonstrated that its conclusions regarding the scale of the accepted effects are consistent with its own stated methodology. Moreover, there is a failure to show compliance with the policies explicitly aimed at protecting these nationally significant landscape and seascape assets. This lack of methodological consistency and evidential substantiation calls into question the adequacy of the applicant's assessment and undermines confidence in the proposal's conformity with the relevant planning frameworks. Consequently, the proposal does not meet the requirements of the key policies that

seek to safeguard landscape and seascape interests, thereby warranting careful reconsideration.

1.1.538 Cultural Landscape, Archaeology and Historic Environment

The practical consequence of the applicant's assessment approach is a significant uncertainty regarding the true impact of the proposals on the setting of historic assets. Although the applicant states that they have applied Historic Environment Scotland's recognised methodology, the essential evaluative process required to determine whether the integrity of setting is maintained has not been demonstrated. Without this key step, the conclusions drawn about heritage impacts lack the necessary evidential foundation and cannot be relied upon with confidence.

Historic Environment Scotland's methodology, developed through extensive consultation, explicitly requires an assessment that goes beyond mere description of visual changes. It mandates a focused evaluation of how any changes affect the contribution that setting makes to the cultural significance of the heritage assets, with particular attention to whether the integrity of that setting is adequately retained. The methodology also clarifies that visual change alone should not be equated directly with adverse impact, emphasising the need for a nuanced and reasoned judgement.

However, a detailed Methodological Audit, which reviewed the applicant's own Appendix 14.3, found that the assessment primarily describes factors such as visibility, distance, and screening, before making an unsubstantiated conclusion that the integrity of setting remains intact. This audit highlights that the crucial evaluative step prescribed by the methodology is absent from the applicant's assessment and its worked examples. Consequently, the reliability of the assessment's conclusions is fundamentally undermined, and the heritage impacts remain insufficiently justified.

The applicant's assessment risks underrepresenting the true impact on heritage assets by not fully capturing the broader cultural landscape and experiential qualities that contribute to their significance. This practical shortcoming could lead to an incomplete understanding of how the proposal might affect the heritage environment, particularly in terms of the lived experience and cultural narrative that these assets embody.

According to the applicant's own baseline, the cultural significance of the affected heritage assets arises from an array of interrelated qualities, including pilgrimage, arrival by sea, and movement through a living cultural landscape. This significance is not derived solely from isolated monuments or static viewpoints but from the dynamic relationships between monuments, spirituality, and the encompassing landscape and seascape. The heritage value is experienced through movement across the site rather than from fixed vantage points, emphasizing the importance of an assessment approach that embraces this fluid and interconnected character.

Furthermore, Historic Environment Scotland's consultation responses, as recorded within the application documentation, have explicitly requested the inclusion of additional viewpoints to ensure that these wider experiential and cultural qualities are properly represented in the assessment. The absence of these viewpoints and the wider landscape context in the applicant's evaluation could therefore result in a

constrained and insufficient appraisal of heritage impacts, undermining the robustness of the planning process and the protection of cultural heritage.

The heritage impact conclusions presented in the application are fundamentally reliant on the findings of the accompanying landscape assessment. It is acknowledged that where the landscape assessment underestimates the extent or significance of landscape effects, as previously outlined, such understatement inevitably affects the accuracy of the heritage conclusions derived from it. This interdependency means that any shortcomings in the landscape evaluation directly diminish the robustness of the heritage impact appraisal.

Given this reliance, the credibility of the heritage conclusions must be carefully scrutinised in light of the identified deficiencies in the landscape assessment. If landscape effects are understated, the heritage impacts, which are assessed on the basis of those landscape effects, will also be understated. This creates a risk that the true extent of harm or change to heritage assets and their settings may not have been fully recognised or appropriately mitigated in the assessment process.

Therefore, a thorough and accurate landscape assessment is essential to underpin any reliable heritage impact conclusions. Without rectifying the shortcomings in the landscape evaluation, it is difficult to place full confidence in the heritage impact findings as currently presented. This highlights the need for a more robust and transparent approach to assessing landscape effects to ensure that heritage considerations are properly informed and addressed.

The application fails to demonstrate compliance with key policy requirements designed to safeguard heritage assets of international and national importance, notably those protected under NPF4 Policy 7(h) concerning scheduled monuments and Policies 7(c) and 7(d) related to their setting. This shortfall is significant given the statutory weight these provisions carry in the planning framework. Additionally, the application does not adequately engage with GEN 6 or the guidance set out in paragraphs 4.22 to 4.23 of the National Marine Plan, both of which reinforce the imperative for rigorous heritage protection.

Critically, the applicant has not provided sufficient evidence to show that the cultural significance of these heritage assets and their settings will be preserved. The absence of a robust assessment undermines the confidence that the proposed development would not result in harm to assets of such high heritage value. Without this essential analysis, Scottish Ministers cannot be satisfied that the statutory duties relating to heritage protection have been fulfilled, thereby compromising the application’s acceptability in principle.

In light of these deficiencies, it is clear that the proposal does not meet the necessary standards for the protection of heritage assets as mandated by current planning policy. This failure to adequately assess and mitigate potential impacts on culturally significant sites fundamentally undermines the application’s compliance and warrants refusal. Consequently, the application should not be granted planning permission.

1.1.539 Effects on Island Communities, Tourism and the Local Economy

The applicant's own baseline assessments acknowledge that the island communities affected by the proposed development rely heavily on visitors who are drawn specifically by the distinctive qualities of the area. These include the landscape, seascape, cultural heritage, tranquillity and remoteness. Such attributes are fundamental to the visitor appeal and, by extension, the economic foundation of these island communities.

Any alteration to these intrinsic qualities directly undermines the economic base upon which these communities depend. This, in turn, jeopardises the provision of local services, threatens population retention, and ultimately compromises the long-term viability and sustainability of the island settlements. The proposal, therefore, poses a significant risk to the fundamental economic and social sustainability of these island communities.

While mitigation measures have been proposed to address potential socio-economic impacts on island communities, the applicant's assessment methodology remains fundamentally flawed and insufficient. Notably, the applicant's own consultants acknowledged habitability as a potentially significant pathway through which the proposal could affect island communities. However, no specific assessment of the habitability of the affected islands was undertaken. Instead, Chapter 18 of the socio-economic assessment focuses primarily on regional-level analysis, examining port communities in detail but neglecting an equivalent place-based assessment of the island communities directly facing the development. Despite this omission, the assessment concludes that these island communities exhibit low sensitivity to tourism-related effects, a conclusion reached without robust, localized analysis.

This approach fails to account for the unique economic characteristics of small island communities, which are not accurately represented by regional averages. Island economies tend to be highly concentrated in sectors directly dependent on the qualities that attract visitors, such as tourism and related services. Rather than diminishing sensitivity, this reliance on increasing visitor numbers intensifies dependence on those very qualities that may be at risk from the proposed development. Therefore, the conclusion of low sensitivity to tourism impacts, derived without any place-based analysis, cannot be considered evidence-based but instead represents an unsubstantiated assumption. Consequently, the socio-economic assessment does not provide a reliable basis for understanding or mitigating potential impacts on island communities.

The proposal fails to comply with essential policy and statutory requirements concerning island communities, resulting in inadequate protection and assessment of their interests. This practical deficiency undermines the integrity of the decision-making process and risks adverse socio-economic impacts on these communities, which depend on thorough and careful evaluation.

In accordance with GEN 19 and paragraph 4.81 of the National Marine Plan, decision-making must be founded on robust socio-economic evidence and adopt a precautionary approach when such evidence is insufficient. Additionally, NPF4 Policy 11(c) alongside the Islands (Scotland) Act 2018 explicitly mandates that the interests of island communities be assessed and given appropriate weight through meaningful engagement from the earliest stages of development through to conclusion. These

provisions collectively ensure that island communities are not overlooked or disadvantaged by development proposals.

However, the applicant has acknowledged the need for particular scrutiny of island communities but has failed to conduct the necessary assessments to understand the proposal's effects on them. Consequently, there is no demonstrated compatibility with the aim of sustaining island communities, nor evidence that the statutory duties owed to these communities have been fulfilled. This omission represents a clear non-compliance with the relevant policy framework, and accordingly, the proposal should not be supported.

1.1.540 Ecology, Biodiversity and Habitats Regulations

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

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

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

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically aimed at addressing potential impacts on the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are typically prepared in circumstances where an adverse effect on the integrity of the protected site cannot be conclusively ruled out. Their inclusion in the application is therefore a significant matter, reflecting the applicant's recognition of the sensitivity of the site and the potential for environmental harm.

Notably, the submission of these documents indicates that the applicant acknowledges the possibility that the Scottish Ministers may reach a different conclusion regarding the likelihood of adverse effects on the protected site's integrity. By proactively providing derogation and compensation proposals, the applicant intends to address such concerns should they arise during the determination process. This approach demonstrates a degree of responsibility in seeking to mitigate potential impacts on a designated conservation area, although it also underscores the inherent uncertainties associated with the assessment of such effects.

Mitigation, compensation proposals, and future monitoring measures, while important components of development planning, do not alone satisfy the stringent statutory tests required under the Habitats Regulations. The competent authority must be assured beyond reasonable scientific doubt that the proposal will not adversely affect the integrity of the protected site before consent can be lawfully granted. This high evidential threshold places the onus squarely on the applicant to demonstrate compliance, rather than relying solely on proposed mitigation or compensation strategies.

This legal framework is reinforced by relevant policy provisions, including GEN 9 and GEN 13 of the National Marine Plan, alongside Policies 3, 4(b), 4(e), and 4(f) of NPF4. Together, these establish a comprehensive and rigorous approach to safeguarding protected habitats and species, ensuring that any development proposals undergo robust assessment consistent with the Habitats Regulations. Consequently, planning consent must be withheld unless these exacting requirements are fully met.

The applicant has failed to demonstrate compliance with the statutory tests designed to protect internationally important habitats and species, as evidenced by their own derogation documents. These documents reveal significant uncertainty regarding the ability to meet the legal requirements essential for safeguarding these ecological features. Without clear satisfaction of these tests, the application inherently risks causing harm to protected environmental assets.

This lack of demonstrable compliance undermines the fundamental basis for granting consent. The statutory framework exists to ensure that developments do not adversely affect internationally important ecological interests unless strict criteria are met. The evidence before the decision-maker does not provide the necessary assurance that these criteria have been fulfilled, meaning the application falls short of the legal standards required for approval.

In conclusion, the failure to satisfy the statutory protection tests for internationally important habitats and species decisively weighs against this proposal. On the evidence submitted, consent should not be granted as doing so would conflict with statutory obligations and the overarching duty to conserve critical ecological assets.

1.1.541 Cumulative and In-Combination Effects

The current assessment before the Scottish Ministers addresses only a portion of the project, excluding critical components such as the export cable corridor and the onshore transmission works, without which the wind farm cannot operate. By deferring these essential elements to later applications, the cumulative effects of the entire project are never considered collectively. This fragmentation means that significant impacts will be evaluated only through subsequent consenting processes, occurring after the principal decision has been made.

Such an approach fundamentally undermines the integrity of the planning process. It contravenes the established legal principle, as affirmed by the courts in Raeshaw Farms, that a project must be assessed in its entirety rather than being segmented into smaller parts whose individual effects may appear less significant.

Consequently, the current method is procedurally flawed and cannot ensure a comprehensive evaluation of the project's true impacts.

The mitigation measures proposed in the Environmental Impact Assessment rely heavily on baseline assessments that have been demonstrated to understate the extent of landscape, heritage, and socio-economic effects. This foundational understatement consequently limits the scope and effectiveness of any mitigation strategy, as the true magnitude of impacts is not fully recognised from the outset. Without an accurate baseline, proposed measures may fail to address the full range of adverse effects, thereby diminishing their overall efficacy and potentially allowing cumulative impacts to remain unchecked.

Furthermore, the cumulative impact assessment itself is rendered unreliable due to this flawed baseline. As the cumulative assessment depends on the findings of the earlier, understated evaluations, the combined effects of the current proposal alongside existing, consented, and foreseeable developments are similarly underestimated. This results in a cumulative impact appraisal that does not reflect the genuine scale of combined effects on the environment and local communities, undermining the robustness of the planning process and the protection of valued assets.

The applicant’s failure to adequately address the cumulative and in-combination effects of the proposal falls short of the mitigation standards required by relevant planning policies and environmental regulations. This deficiency engages GEN 21 and paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), as well as the Environmental Impact Assessment Regulations concerning project splitting. Crucially, the assessment does not reliably identify or evaluate the overall effects of the project, including deferred works. It is therefore imperative that the decision-making process explicitly considers these deferred elements to ensure full compliance with policy and regulatory requirements.

1.1.542 Public Engagement, Site Selection and Environmental Information

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

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

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

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

The practical consequence of the deficiencies identified in the Environmental Impact Assessment (EIA) is that the Scottish Ministers lack sufficient environmental information to make a fully informed decision on the application. The assessment fails to adequately investigate all identified pathways to significant effects, relying instead on methodologies that do not substantiate its conclusions. For example, the landscape assessment presents outcomes based on a distance pattern not supported by its own written methodology; the heritage assessment does not demonstrate the application of its own integrity test; and the socio-economic assessment lacks a place-based analysis of the islands directly affected.

Furthermore, the application depends in some instances on future assessments, post-consent plans, monitoring, and additional approvals to address outstanding issues. Such reliance does not satisfy the requirements of the EIA Regulations, which mandate that likely significant effects be understood before the application is determined. The regulatory framework is clear that these matters must be resolved through the evidence presented at the time of decision-making, not deferred to a later stage.

In conclusion, the applicant has not demonstrated that the environmental information submitted is adequate for the Scottish Ministers to discharge their statutory duties. Without sufficient and comprehensive evidence, there is a risk that the decision will be made without a full understanding of the environmental impacts, which undermines the purpose of the EIA process and the statutory requirements it seeks to uphold.

1.1.543 Effects on Local Area

The applicant’s assessment significantly underestimates the direct and substantial effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Although Islay and Colonsay are the closest inhabited islands to the development area—which lies immediately north-west of Islay and west of Colonsay—the application primarily treats Islay as a potential project location rather than as a distinct island community likely to be affected. This approach fails to provide any place-based evaluation of how the 448 square kilometre development area, particularly its Atlantic-facing edge closest to Islay, might impact the island’s setting, local economy, or community life.

For Colonsay and Oronsay, the shortcomings are equally pronounced. The seaward outlook that shapes daily life on these islands faces directly towards the development array, with Colonsay's coastline designated as the North Colonsay and Western Cliffs Special Protection Area. This area is central to the applicant's derogation case and compensation plan, implicitly acknowledging that harm to the internationally protected seabird populations there cannot be ruled out. Moreover, Oronsay Priory—a scheduled monument of national importance—lies within this community's vicinity, yet the heritage assessment fails to adequately address the effects on its open maritime setting. These gaps fundamentally undermine the reliability of the environmental and heritage impact evaluation presented in the application.

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

The applicant's assessment underestimates the practical consequences for several designated landscapes and island communities by excluding or downplaying significant effects. Ulva, located within the Loch na Keal National Scenic Area, is a community-owned island undergoing early-stage regeneration. This small, re-establishing community's recovery is intrinsically linked to the preservation of the unspoilt seascape and setting that the development would affect, yet no dedicated assessment of impacts on Ulva has been undertaken. Similarly, Staffa, also within the Loch na Keal National Scenic Area and renowned as one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development area—beyond the 30-kilometre limit suggested by NatureScot for assessing effects on National Scenic Area qualities. Despite acknowledging the island's panoramic maritime qualities, the applicant concludes that the scale of change would be small and the effect not significant, a position that risks overlooking the sensitivity and importance of this well-known landscape.

Further afield, the Jura National Scenic Area, situated about 28 to 32 kilometres from the development, is characterised by high sensitivity due to its wild, undeveloped Atlantic outlook, which forms the basis of its designation. The applicant attributes only a Medium to Low magnitude of impact here, citing factors such as distance, apparent scale, and retained landforms as justification for this moderation. The Scarba, Lunga, and Garvellachs National Scenic Area, lying approximately 35 to 40 kilometres away, is treated similarly, with potential effects minimised without detailed consideration of the cumulative or specific landscape qualities at stake. Taken together, these assessments suggest a pattern of insufficient recognition of the development's wider impacts on important seaboard designated landscapes and vulnerable island communities, thereby undermining the protection of their natural and cultural qualities.

While the applicant's assessment attributes a Low magnitude of change to the South Tiree coastal area, this conclusion fails to reflect the true scale of impact on a landscape of High sensitivity at approximately 35 kilometres distance. Tiree's exceptionally low-lying topography, with its highest point, Ben Hynish, reaching only 141 metres, defines a landscape dominated by the vast expanse of sea and sky. The introduction of turbines up to 335 metres in height would create vertical elements unprecedented in this open oceanic horizon. Such significant alteration to the island's distinctive and sensitive seascape cannot reasonably be characterised as Low magnitude. This understatement leads to an unreliable evaluation of effects, overlooking the profound visual and experiential change that the proposal would impose on Tiree's unique landscape character.

The applicant's assessment fails to consider significant effects on mainland and island communities that have direct visual and economic connections to the seascape impacted by the proposed development. This omission undermines the comprehensiveness of the environmental appraisal and risks overlooking adverse consequences for populations reliant on the coastal environment.

Gigha, a community-owned island celebrated nationally for its regeneration, faces the development site from the east. The finely balanced community and its economy, which depend substantially on the surrounding waters, have not been examined within the assessment. Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the receptors affected by the distance-based moderation approach contested in this representation.

Furthermore, the chain of communities along the west coast of Kintyre, whose character and visitor economy are defined by the open Atlantic seaboard views towards Islay, Jura, and adjacent waters, share comparable exposure. The Treshnish Isles and other small islands and mainland coasts with outlooks toward the development area are equally disregarded. Such omissions from the assessment leave a critical gap in understanding the full scope of the development's effects and should be addressed to ensure a robust and inclusive evaluation.

The applicant's environmental impact assessment employs a distance-based methodology that systematically moderates the magnitude of change and discounts

the significance of effects on sensitive receptors located beyond approximately 20 kilometres. This approach is evident in the treatment of numerous highly sensitive locations, where the assessment reduces the perceived impact with increasing distance, effectively diminishing the weight given to changes experienced by these receptors. As a result, the assessment fails to provide a comprehensive, place-based analysis for the communities residing beyond this threshold, who nonetheless endure the consequences of the proposed development.

This systematic moderation and discounting undermine the integrity of the environmental impact assessment by neglecting the real and potentially significant effects on distant but sensitive receptors. The absence of detailed, location-specific evaluation for these communities means that their experiences and the full extent of environmental change are neither adequately recognised nor addressed. Consequently, the assessment’s reliance on a rigid distance metric results in an incomplete understanding of impacts, potentially compromising the robustness and fairness of the decision-making process.

1.1.544 Personal Observations

In addition to the planning matters above, I am personally concerned because: Mull, Iona and Colonsay are Islands we love and value due to their deep cultural and historical significance. They are wild and extremely special because of their dark skies, marine environment and internationally important bird life. I have lived on the Ross of mull and continue to have deep connections to the area.The unbuilt up nature and connection to the past that can be found here can't be underestimated.

Based on my own local knowledge, I also wish to highlight that: Yes, this is an area of international cultural, historical and environmental significance and as noted in the objections this has been underestimated and downplayed in the planning consultation

1.1.545 Summary

The proposal before the Scottish Ministers fails to demonstrate compliance with the relevant statutory and policy frameworks governing its determination. The applicant’s own assessment acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal area. However, independent analyses of the applicant’s documentation reveal that these impacts have been underestimated. Crucially, the necessary heritage assessment has not been completed, and although the effects on the island communities affected by the development were identified, no evaluation of these impacts has been undertaken. Furthermore, the ecological requirements have not been demonstrated as achievable. It is also important to note that only a portion of the overall project is currently under consideration by the Scottish Ministers.

In light of these deficiencies, I urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm proposal and to reject the associated marine licence application. Should the Ministers decide against refusal, I request that they require the submission of additional environmental information and enhanced visualisations of the proposal. Moreover, I recommend that determination of the

applications be deferred until after a public inquiry has taken place, thereby allowing thorough examination of the concerns raised in this objection. Regardless of the outcome, I ask that the Scottish Ministers explicitly address and provide clear reasoning on the effects of the development on cultural heritage and the impacted island communities within their decision statement.

Yours faithfully,

[Redacted]

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

Member of the public 558
Dear Sir/Madam,

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

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

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

1.1.546 Seascape, Landscape and Visual Effects

The proposed development would introduce aviation and navigation lighting to a currently unlit sea horizon, resulting in a permanent alteration to the character of the night-time seascape throughout the stated 35-year operational life. This change represents a significant modification to the visual environment, as the existing natural darkness of the seascape would be replaced by artificial illumination that is visible from surrounding areas. The introduction of such lighting not only alters the aesthetic qualities of the seascape but also establishes a new baseline condition for the area’s nocturnal character during the lifetime of the project.

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

The proposal’s failure to adequately assess and mitigate its environmental impacts results in a clear breach of key planning policies designed to safeguard important

landscape and seascape interests. This non-compliance threatens the integrity of nationally significant natural assets, undermining the practical objective of preserving these environments for current and future generations. Without a robust demonstration of policy adherence, the potential for irreversible harm remains unacceptably high.

The applicant's submission notably lacks consistency between the scale of acknowledged effects and the methodology applied to reach those conclusions. This inconsistency calls into question the reliability of the environmental assessment and weakens confidence in the proposal's capacity to address adverse impacts effectively. Consequently, the assessment falls short of the standards set by NPF4 Policies 4(c), 4(d), 11(d), 11(e), GEN 7, and paragraph 4.28 of the National Marine Plan, which collectively establish clear expectations for protecting nationally important landscapes and seascapes.

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

1.1.547 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment employs the methodology recognised by Historic Environment Scotland for evaluating effects on the setting of historic assets. This approach, developed in consultation with Historic Environment Scotland, mandates an evaluation that goes beyond mere visual change, focusing instead on whether alterations to setting affect the contribution setting makes to the cultural significance of heritage assets and whether the integrity of setting is maintained. It explicitly cautions against equating visual change directly with adverse impact, emphasising a nuanced, evaluative process.

However, an independent Methodological Audit, conducted in response to community objections and relying solely on the applicant's Appendix 14.3, identifies a significant deficiency in the applicant's operational assessment. While the assessment successfully identifies relevant heritage attributes such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it fails to demonstrate how the integrity of setting has been evaluated in accordance with the prescribed methodology. Instead, the assessment primarily describes visual changes and then asserts that the integrity of setting is adequately retained without undertaking the necessary evaluative step. This omission undermines the reliability of the conclusions drawn about heritage impacts and calls into question the robustness of the overall assessment.

The applicant's assessment acknowledges that the cultural significance of the affected heritage assets stems from experiential qualities such as pilgrimage, arrival by sea, and movement through a living cultural landscape, including the interrelationships between monuments, spirituality, and the surrounding landscape and seascape. However, the proposed mitigation measures appear insufficient in

addressing these dynamic and experiential aspects, as they focus predominantly on fixed viewpoints rather than the broader cultural landscape experienced through movement. This limitation risks an incomplete understanding and inadequate protection of the heritage assets' full significance.

Furthermore, Historic Environment Scotland's consultation responses, as recorded in the application, highlight the need for additional viewpoints to adequately represent these wider cultural qualities. The absence of such comprehensive viewpoints undermines the assessment's ability to capture the nuanced relationships and experiential values critical to the heritage assets. Consequently, the applicant's current approach does not fully reflect the cultural baseline, thereby compromising the robustness of the heritage impact evaluation. It is essential that these broader qualities are properly incorporated to ensure an accurate and respectful appraisal of heritage impacts.

The heritage impact conclusions presented rely heavily on the findings of the landscape assessment, making it essential that the latter is robust and comprehensive. However, where the landscape effects have been understated, as previously detailed, this inevitably leads to a corresponding understatement in the heritage conclusions that depend upon them. This reliance creates a critical vulnerability in the overall assessment, as any deficiencies in the landscape evaluation directly diminish the credibility of the heritage impact analysis.

In comparing the approach taken to mitigation, it becomes clear that effective and accurate landscape assessment is fundamental to informing appropriate heritage protection measures. If the landscape effects are downplayed, the subsequent heritage conclusions may fail to fully recognise the true extent of potential harm. This could result in mitigation strategies that are insufficiently rigorous or targeted, thereby compromising the preservation of valued heritage assets. The interdependence of these assessments necessitates a consistent and thorough approach to landscape evaluation to ensure that heritage impacts are neither overlooked nor minimized.

Therefore, it is crucial that the landscape assessment be revisited and strengthened to provide a more accurate and complete picture of the effects. Only with a reliable landscape baseline can heritage impacts be properly understood and addressed. Without rectifying these deficiencies, the heritage conclusions remain undermined, and the planning decisions based upon them risk inadequately safeguarding the historic environment.

The application engages National Planning Framework 4 (NPF4) Policy 7, specifically subsections (h) concerning scheduled monuments and (c) and (d) relating to the settings of heritage assets, alongside GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Despite this, the applicant has failed to demonstrate that the cultural significance of both internationally and nationally important heritage assets, as well as their settings, will be adequately protected. Crucially, the Scottish Ministers have not been provided with the comprehensive assessment necessary to substantiate such a conclusion. Without this essential evidence, the proposal falls short of meeting key policy requirements for heritage protection, thereby undermining its acceptability within the planning framework.

1.1.548 Effects on Island Communities, Tourism and the Local Economy

While mitigation measures may be proposed to address certain environmental or visual impacts of the development, it is imperative to recognise that such measures cannot fully preserve the essential qualities that underpin the appeal of these island communities. The applicant's own baseline assessments identify key attributes—landscape, seascape, cultural heritage, tranquillity and remoteness—that are integral to the visitor experience. Any diminution of these qualities, even if partially mitigated, risks undermining the very characteristics that attract visitors in the first place.

This dependency on visitors is of exceptional significance for the island communities affected by the proposal. These communities rely heavily on visitor-generated economic activity, and the erosion of their landscape and cultural assets would directly impact their economic base. The consequent effects would extend beyond tourism to threaten local services, population stability and the broader social sustainability of the islands. Therefore, the proposal presents a fundamental threat to the long-term viability of these communities, as it jeopardises the qualities that sustain both their economies and their social fabric.

The practical consequence of the applicant's approach is a fundamental underestimation of the potential socio-economic impacts on island communities directly affected by the proposal. While the applicant's consultants acknowledge habitability as a significant pathway for impact, no specific assessment of the habitability of these islands has been undertaken. Instead, the socio-economic assessment in Chapter 18 focuses primarily on regional port communities with detailed analysis, neglecting an equivalent, place-based assessment of the island communities themselves. Despite this lack of focused analysis, the assessment nonetheless concludes that these island communities exhibit low sensitivity to tourism effects, a conclusion that lacks substantive evidential basis.

This conclusion fails to recognise the unique economic characteristics of small island communities, which cannot be accurately represented by regional averages. Island economies are typically concentrated in sectors highly sensitive to changes in the environmental qualities that attract visitors. Moreover, an increasing dependence on visitor numbers intensifies, rather than mitigates, this sensitivity. Without place-specific analysis, the assertion of low sensitivity amounts to an unsubstantiated assumption rather than evidence-based reasoning. Consequently, the socio-economic assessment methodology is flawed and insufficient to properly understand or mitigate the impacts on the island communities facing the development.

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

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

1.1.549 Ecology, Biodiversity and Habitats Regulations

There remains considerable uncertainty regarding the ecological implications of the proposed development, given the presence of Priority Marine Features and Annex I habitats within the development area itself. The surrounding waters are known to support a range of sensitive species, including seabirds, marine mammals, and basking sharks. Introducing large-scale construction, operational, and decommissioning activities into this environment over several decades raises significant concerns about potential adverse environmental effects. Consequently, the ecological importance and sensitivity of the site and its environs must be carefully considered to ensure that the proposal does not result in unacceptable harm to these protected marine features and species.

The applicant's submission of a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan reflects an acknowledgement of the potential for adverse effects on the North Colonsay and Western Cliffs Special Protection Area, specifically targeting the guillemot population. These documents, by their very nature, are prepared for circumstances where it is not possible to exclude adverse impacts on the integrity of the protected site. Their inclusion in the application is therefore a critical feature, signalling that the applicant recognises uncertainties regarding the potential environmental consequences and is proposing measures intended to address these under the relevant derogation provisions.

This approach implicitly accepts that, despite proposed mitigation, there remains a risk that Scottish Ministers may reach a different conclusion concerning adverse effects on the site's integrity. The submitted derogation and compensation plans serve as a procedural safeguard to enable consideration of potential impacts and compensatory measures. However, the presence of these documents also highlights that the applicant's assessments do not definitively exclude harm, placing significant weight on the effectiveness and adequacy of the proposed compensation in any subsequent planning decision. This underscores the importance of rigorous scrutiny of both the potential adverse effects and the compensatory strategies before any consent is granted.

Consent for developments impacting protected habitats and species can only be lawfully granted if it is conclusively demonstrated that the proposal will not adversely affect the integrity of the designated site. This requirement means that no reasonable scientific doubt can remain regarding potential harm. The practical consequence is that any application must meet a very high evidential standard before consent is issued.

This strict legal framework is set out under the Habitats Regulations, which stipulate that consent is conditional upon either an absence of adverse effect or the fulfillment of stringent derogation tests. The responsibility for proving compliance rests firmly with the applicant. Importantly, proposals for mitigation, compensation, or future monitoring alone do not satisfy the statutory tests required for lawful consent.

In addition to the Habitats Regulations, this framework is supported by relevant provisions in GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. Together, these policies reinforce the necessity for rigorous scientific evidence and legal compliance in decision-making processes affecting protected sites.

The evidence submitted in support of this application, including the applicant's own derogation documents, fails to demonstrate that the statutory tests designed to protect internationally important habitats and species can be met. This shortcoming is critical, as these tests are fundamental legal requirements intended to safeguard ecological features of international significance. Without clear and convincing evidence that these criteria are satisfied, the basis for granting consent is substantially weakened.

Moreover, the applicant's documentation reveals a degree of uncertainty that further undermines confidence in compliance with these statutory protections. The presence of such uncertainty suggests that the potential impacts on protected habitats and species have not been adequately assessed or mitigated. This gap in the evidence and the lack of certainty effectively compromise the integrity of the application and its alignment with national and international conservation obligations.

In conclusion, the failure to satisfy the legal tests protecting internationally important ecological features is a decisive factor against the approval of this application. Given the paramount importance of these statutory safeguards, it would be inappropriate to grant consent in the absence of demonstrable compliance. Therefore, the application should be refused to ensure the continued protection of these vital natural assets.

1.1.550 Public Engagement, Site Selection and Environmental Information

When comparing the consultation process in this case to the standards set by GEN 18 of the National Marine Plan and the principles enshrined in the Aarhus Convention, it is evident that the conditions for public participation were significantly deficient. Those standards require that affected communities are afforded a realistic opportunity to engage meaningfully in decisions of considerable impact. In contrast, the applicant's consultation period coincided with the busiest months for island residents, who were heavily committed to continuous work throughout the visitor season, limiting their capacity to access specialist advice or fully consider the voluminous technical documentation submitted, which spans many thousands of pages. Meanwhile, the applicant has benefited from years of preparation, with extensive professional and financial resources, further skewing the participatory balance.

These shortcomings directly undermine the legitimacy of the site-selection process, particularly given the weight that Scottish Ministers are asked to place on it. The

deficiencies in public engagement evident at both the plan and site-selection stages have persisted into the application stage, resulting in a process that falls short of the effective participation required by national policy and international obligations. It is therefore incumbent on Ministers to take these factors seriously when considering the representations submitted, recognising that the affected communities were not provided with a fair or practical opportunity to contribute to decisions of this magnitude.

While mitigation measures and future monitoring plans are proposed, reliance on these post-consent actions does not satisfy the fundamental requirement that likely significant environmental effects be fully understood prior to determination. The Environmental Impact Assessment submitted is the principal evidential basis for the Scottish Ministers' decision. However, the assessment falls short of sufficiency, despite its breadth. Key topics reveal significant shortcomings: the landscape assessment employs a methodology that does not support its conclusions, notably attributing outcomes to distance patterns absent from its own framework; the heritage assessment fails to demonstrate application of its stated integrity test; and the socio-economic assessment lacks any place-based analysis pertinent to the affected islands. By deferring critical elements to future approvals and monitoring, the applicant has not provided adequate environmental information. Consequently, the Scottish Ministers are unable to make an informed determination based on the evidence before them, as required by the EIA Regulations.

1.1.551 Effects on Local Area

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

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

thereby weakening the overall robustness of the environmental and heritage impact evaluation.

While the applicant's assessment acknowledges certain visual and community impacts on Iona, it nonetheless underestimates their scale and significance, particularly when compared to the mitigation measures proposed. The Coastal Character assessment attributes a High sensitivity to the Sound of Iona, noting its direct orientation towards the development and extensive visibility across a large geographical extent. The turbines would be visible over approximately 21 kilometres, spanning around 39 degrees of the horizon, producing an effect described as Moderate and Significant. Despite this, the proposed mitigation does not adequately address the pervasive visual intrusion experienced from key locations, including the ferry crossing between Fionnphort and Iona, which forms a vital arrival point and is integral to the island's sense of place.

The West Coast of Iona is similarly assessed as highly sensitive with widespread visibility, and the applicant accepts that significant effects will be experienced by residents and visitors across much of the island, including at Dùn Ì, its highest point. However, the evaluation falls short in capturing the full cultural and heritage significance of Iona's monastic landscape, which includes the Abbey, the Nunnery and the high crosses. This heritage is of international importance, with its significance intrinsically linked to pilgrimage, arrival by sea, and movement through the landscape, as identified in the applicant's own baseline studies. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet notably, no visualisation has been provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, leaving a critical gap in the assessment of visual impact on this internationally important heritage setting.

Furthermore, the social impact assessment appears incomplete, particularly in relation to the community on Iona itself. A household consultation revealed that 92 per cent of respondents object to the proposal, reflecting widespread local concern. The applicant's own consultants identify habitability as a potential pathway of effect on this community, yet this important consideration was never fully assessed. To contextualise the scale of the visual impact, the largest turbines would surpass the height of Ben Hynish on Tiree, a well-known landmark standing at 141 metres and visible from Iona at approximately 33 kilometres; the turbines would be approximately 194 metres tall and at roughly two-thirds of that distance. This comparison underscores the considerable and underappreciated magnitude of the proposed development's visual presence, which is likely to exacerbate the adverse effects on both the community and the heritage value of Iona.

The applicant's assessment acknowledges significant effects on the Ross of Mull South coastal area, which is identified as having High sensitivity at distances of approximately 22 to 24 kilometres and attributed Medium magnitude. Significant impacts are accepted at Erraid and on the Core Paths of the Ross, as well as at Fionnphort, the gateway to Iona and the primary embarkation point for visitors, where the community is most directly affected by visitor flows. Similarly, across Mull, the applicant recognises significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, which encompasses Mull's western waters and islands and is assessed as

High sensitivity throughout at distances of 21 to 33 kilometres, is nonetheless attributed no more than Medium magnitude.

However, this assessment relies heavily on distance-based reasoning, as exemplified by the treatment of the Wilderness and Gribun Rocks coastal area. Here, the applicant concludes that the scale of change is small due to the viewing distance exceeding 30 kilometres, a conclusion that this representation identifies as insufficiently reflective of actual visual and experiential impacts. Crucially, Mull's west-facing tourism economy, which includes wildlife boat operations and the accommodation sector of its western townships, depends fundamentally on the integrity of the Atlantic seascape that the development would industrialise. Despite this, none of these communities has received a place-based assessment tailored to their specific economic and social context.

In summary, the applicant's approach underestimates the significant visual, economic, and community impacts on Mull and Ross of Mull, particularly in relation to designated landscapes and tourism-dependent communities. This omission undermines a full understanding of the effects on these sensitive and economically reliant coastal areas.

The applicant's assessment significantly underestimates the impacts on designated landscapes and vulnerable island communities, resulting in inadequate protection of their natural and cultural qualities. Notably, Ulva, a community-owned island within the Loch na Keal National Scenic Area, is at the outset of its regeneration. This small, re-establishing community relies fundamentally on the unspoilt seascape and setting, yet the applicant has made no assessment of the effects on Ulva, overlooking a critical aspect of local recovery and sustainability.

Further, Staffa, also within the Loch na Keal National Scenic Area and one of Europe's most renowned small islands, lies approximately 35 kilometres from the development site. This distance exceeds the 30-kilometre range within which NatureScot requested an assessment of effects on National Scenic Area qualities. Despite acknowledging the island's panoramic maritime qualities, the applicant concludes that changes there would be small and not significant, a position that fails to fully recognise Staffa's exceptional status and sensitivity.

Similarly, the Jura National Scenic Area, situated about 28 to 32 kilometres from the site, is judged to have only medium to low magnitude effects due to distance and retained landforms, despite its designation emphasising its wild, undeveloped Atlantic outlook. The Scarba, Lunga, and Garvellachs National Scenic Area, at 35 to 40 kilometres distance, receives comparable treatment. Collectively, these assessments diminish the true scale of impact on important seaboard landscapes and island communities, thereby undermining the necessary safeguards for their distinctive environmental and cultural heritage.

While the applicant's assessment attributes a Low magnitude of change to the South Tiree coastal area at a distance of approximately 35 kilometres, this conclusion appears inconsistent when contrasted with the inherently sensitive nature of Tiree's landscape. The area is correctly identified as having High sensitivity, yet the scale of the proposed turbines—up to 335 metres in height—would introduce vertical

elements unprecedented in the island's seascape. Given that Tiree is an exceptionally low-lying island, with its highest point, Ben Hynish, reaching only 141 metres, the dominance of sea and sky fundamentally defines its landscape character. The introduction of turbines more than twice this height would significantly alter the open oceanic horizon that is central to Tiree's distinctive sense of place. Consequently, a Low magnitude of change understates the true extent of visual and landscape impact on such an exposed and sensitive receptor. Therefore, the applicant's evaluation cannot be regarded as a reliable reflection of the likely effects on Tiree's landscape character.

The applicant's assessment fails to consider the significant effects on several mainland and island communities that have direct views of, and economic reliance upon, the seascape where the development is proposed. This omission has practical consequences for the accuracy and completeness of the environmental evaluation, as these communities represent key receptors whose social and economic well-being is closely intertwined with the quality and character of the surrounding marine environment. Without their inclusion, the assessment cannot be regarded as comprehensive or fully informed.

Among the communities overlooked is Gigha, a community-owned island of national significance due to its residents' purchase, which symbolises island regeneration. Gigha faces the development site from the east, yet the effects on its finely balanced community and economy have not been examined. This is a notable omission given the island's unique status and the potential sensitivity of its social and economic fabric to changes in seascape character. Similarly, Ardnamurchan Point—the most westerly point of the British mainland—commands panoramic views along the Hebridean seaboard that attract visitors to the peninsula. These seaward panoramas are precisely the receptors to which the applicant's distance-based moderation approach should apply, but it has been disregarded.

Further, the west coast of Kintyre comprises a chain of communities whose outlook, character and visitor economy are defined by the open Atlantic seaboard looking towards Islay, Jura, and the wider waters beyond. The Treshnish Isles and other small islands and mainland coasts with views towards the development area share this position. The failure to assess impacts on these interconnected communities undermines the robustness of the environmental appraisal and risks neglecting the socio-economic repercussions of the proposal. It is essential that the assessment be revisited to address these gaps, ensuring all relevant receptors are properly considered.

The applicant's reliance on a distance-based approach results in a systematic underestimation and discounting of significant effects on sensitive receptors located beyond 20 kilometres. This methodology leads to the practical consequence that highly sensitive receptors beyond this threshold experience a moderated magnitude of change in the assessment, effectively diminishing the recognised effect. Furthermore, the communities residing in these areas have not been subject to any place-based assessment, leaving their specific circumstances and sensitivities unaddressed. Taken together, these factors undermine the integrity of the environmental impact assessment by failing to adequately recognise and evaluate the full extent of potential impacts on receptors at greater distances. It is therefore

concluded that the applicant’s approach is insufficient and does not provide a comprehensive or reliable basis for environmental decision-making.

1.1.552 Personal Observations

In addition to the planning matters above, I am personally concerned because: My family live and work on Iona and I visit frequently

Based on my own local knowledge, I also wish to highlight that: Iona relies on untouched beauty for tourism

1.1.553 Summary

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

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

Yours faithfully,

[Redacted]

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

Member of the public 559
Dear Sir/Madam,

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

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

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

1.1.554 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989, which requires the applicant to have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant must take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The evidence provided does not show that these requirements have been adequately addressed. As the Scottish Ministers are also required to have regard to these statutory duties in determining the application, the absence of demonstrated compliance, alongside identified deficiencies and omissions, constitutes a clear conflict with the applicable legal and policy framework. Consequently, these failures weigh decisively against the granting of consent.

The marine licence application must be refused because it fails to demonstrate compliance with the statutory requirements set out in Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland’s National Marine Plan. The decision-making process is legally bound to accord with the National Marine Plan unless other relevant considerations apply, and this application does not meet that threshold. Specifically, the application does not adequately address the General Policies critical to this proposal, including GEN 4 on Co-existence, GEN 6 and paragraphs 4.22 to

4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 on Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 and paragraph 4.85 on Cumulative Impacts. The absence of demonstrated compliance with these policies constitutes a fundamental procedural and substantive deficiency in the application.

Furthermore, the evidence explicitly identifies deficiencies, omissions, and conflicts with the applicable legal and policy framework that have not been resolved or mitigated. These shortcomings directly contravene the statutory assessment requirements and weigh decisively against the granting of consent. The failure to provide sound evidence and to properly engage with the cumulative impacts and natural heritage considerations undermines the integrity of the application and its conformity with the National Marine Plan. In light of these unresolved issues, the application cannot be considered compliant with the Marine (Scotland) Act 2010 or the National Marine Plan policies, and therefore must be refused.

The applicant's submission must be considered in light of the statutory requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations. These regulations mandate that the likely significant environmental effects of any proposed development be thoroughly identified, assessed, and reported prior to any determination on consent. This procedural obligation is fundamental to ensuring that decision-makers have a comprehensive understanding of the environmental consequences before authorising development.

In addition, the Habitats Regulations impose a clear legal duty to assess the effects of the proposal on European protected sites in accordance with the applicable statutory tests. This assessment is not discretionary but a mandatory prerequisite to consent, designed to safeguard protected habitats and species from adverse impacts arising from development.

The evidence before the determining authority does not demonstrate compliance with these legal requirements. There are clear deficiencies and omissions in the environmental impact assessment submitted by the applicant, which fail to adequately identify and evaluate the significant environmental effects as required by the 2017 Regulations. Furthermore, the Habitats Regulations Assessment is incomplete and does not satisfy the statutory tests necessary to confirm that the proposal will not adversely affect the integrity of European protected sites.

Given these shortcomings, the application is in conflict with the applicable legal and policy framework governing environmental protection and habitat conservation. The absence of a robust and compliant environmental impact assessment and habitats regulations assessment undermines the statutory process and leaves the decision-maker without the necessary evidence to lawfully grant consent.

Accordingly, these failures weigh decisively against the granting of planning permission. The proposal should be refused on the grounds that it does not meet the mandatory requirements of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the Habitats Regulations, and the

evidence submitted is insufficient to demonstrate that the proposal would not cause significant environmental harm or adverse effects on protected habitats.

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

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

1.1.555 Conflict with National Planning Framework 4 and the Development Plan

There remains considerable uncertainty as to whether the proposal aligns with the requirements set out in the National Planning Framework 4 (NPF4) regarding the protection of nationally important assets. Policy 11, which operates in conjunction with Policies 4(c) and 4(d), is expressly designed to safeguard National Scenic Areas and other nationally important landscapes from significant adverse effects on the qualities for which they have been designated. It is therefore crucial to assess the proposal's potential impacts against these stringent criteria.

Furthermore, the proposal must be considered in light of Policy 7, which includes provisions such as Policy 7(h) relating to scheduled monuments, and Policies 7(c) and 7(d) concerning the settings of historic assets. The evidence before us does not adequately demonstrate that the cultural significance of these heritage assets, including scheduled monuments and their settings, would be preserved. Alongside this, Policy 3 requires that biodiversity considerations be met, yet it remains unclear whether the ecological tests can be satisfied based on the evidence submitted.

In summary, the proposal appears to conflict with several key policies within NPF4 aimed at protecting designated landscapes, heritage assets, and biodiversity. These unresolved issues highlight a failure to demonstrate compliance with the framework's safeguarding objectives, thereby raising substantial concerns about the proposal's acceptability in its current form.

The proposal would result in adverse effects upon the landscape, heritage, and community interests safeguarded by the relevant terrestrial development plan policies, including those set out in the Argyll and Bute Local Development Plan 2. These detrimental impacts directly conflict with the objectives and protections established within the development plan framework. Furthermore, this inconsistency extends to National Planning Framework 4 when considered in its entirety. The applicant has not provided evidence to overcome these conflicts or to demonstrate compliance with the applicable policy requirements. Consequently, the proposal is fundamentally at odds with the terrestrial development plan framework pertinent to land-based effects and should be refused on this basis.

1.1.556 Seascape, Landscape and Visual Effects

The proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration of the night-time seascape character for the duration of its 35-year operational life. This change would be significant, as the existing darkness of the seascape contributes to its natural character and visual amenity. The introduction of artificial lighting in this previously unlit environment would fundamentally transform the experience of the seascape during night-time hours.

Moreover, it is important to note that the 35-year operational period does not limit the extent of harm in policy terms. Granting consent for this development effectively signifies that the seascape is deemed suitable for wind farm use, with all the consequent impacts on its character and qualities. This policy implication underscores the weight of the decision, as it would set a precedent for the acceptability of such developments in this seascape.

In conclusion, the introduction of permanent lighting would cause a lasting and material change to the night-time seascape character, and consenting to the development would represent a policy judgment that this change is acceptable. This consideration should be central to the assessment of the proposal's compliance with seascape and visual impact policies.

1.1.557 Cultural Landscape, Archaeology and Historic Environment

The applicant's baseline assessment acknowledges that the cultural significance of the affected heritage assets is intrinsically linked to experiential qualities such as pilgrimage, arrival by sea, and movement through a living cultural landscape. This significance arises from the dynamic relationships between monuments, spirituality, and the encompassing landscape and seascape, which are fundamentally experienced through movement rather than static viewpoints. Such recognition underscores the importance of evaluating heritage impacts within the context of the broader cultural landscape and the lived experience it offers.

Nevertheless, Historic Environment Scotland's consultation responses, as documented in the application, highlight a concern that the applicant's assessment may not fully capture these wider qualities. In particular, they requested additional viewpoints to ensure that the comprehensive cultural and experiential dimensions are properly represented. This suggests that the current assessment framework may inadequately reflect the full baseline qualities, thereby limiting the robustness of heritage impact evaluation. Addressing this gap is essential to accurately appraise the significance and potential effects on the heritage assets in their cultural context.

There remains significant uncertainty regarding the application's compliance with key heritage protection policies. Specifically, it engages NPF4 Policy 7(h) concerning scheduled monuments, alongside Policies 7(c) and 7(d) which address the settings of such assets, as well as GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. These provisions collectively establish a clear framework for safeguarding the cultural significance of heritage assets and their surroundings.

Despite this policy context, the applicant has failed to demonstrate that the cultural significance of internationally and nationally important heritage assets and their settings will be protected. Moreover, the Scottish Ministers have not been provided with the requisite assessment to support such a conclusion. In light of this absence of essential evidence, the application cannot be considered acceptable in terms of heritage protection.

1.1.558 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development exhibit an exceptional dependence on visitors, whose presence underpins the local economy. These visitors are primarily attracted by the very qualities identified in the applicant's own baseline assessments: the distinctive landscape and seascape, the rich cultural heritage, and the prevailing sense of tranquillity and remoteness. Such attributes are not merely incidental but form the essential foundation of the visitor economy that sustains these communities.

Any alteration to these fundamental qualities would therefore have a direct and adverse impact on the economic base of the islands. This, in turn, threatens the viability of essential local services, the stability of resident populations, and the broader social sustainability of the communities themselves. The proposal, by jeopardising the key characteristics that draw visitors, risks undermining the long-term future of these island settlements.

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

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

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

1.1.559 Ecology, Biodiversity and Habitats Regulations

The development area is characterised by the presence of Priority Marine Features and Annex I habitats, indicating its high ecological value. These sensitive habitats lie within the site itself, while the surrounding waters serve as important environments for a range of protected species, including seabirds, marine mammals, and basking sharks. This establishes the site and its environs as an area of significant ecological importance and sensitivity.

The proposed development would introduce extensive construction, operational, and decommissioning activities into this delicate marine setting over a prolonged period, spanning several decades. Given the scale and duration of the proposal, there is a considerable potential for significant adverse environmental effects on the Priority Marine Features and the protected species that the surrounding waters support. Such impacts warrant careful and thorough consideration to ensure the protection of these important ecological assets.

The applicant has provided a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically addressing the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are customarily prepared when it is not possible to exclude adverse effects on the integrity of a protected site. Their inclusion in the submission is therefore a notable aspect of the application, indicating that the applicant acknowledges potential impacts that may arise.

This approach reflects an understanding that the Scottish Ministers may ultimately reach a different conclusion regarding the likelihood of adverse effects on the protected site’s integrity. By submitting these derogation and compensation measures, the applicant demonstrates a proactive stance aimed at addressing any such impacts in accordance with the derogation provisions. This recognition and corresponding documentation are integral to the assessment of the application’s compliance with relevant environmental protections.

The applicant’s submitted evidence, notably their own derogation documents, reveals a significant shortfall in demonstrating compliance with the statutory tests designed to protect internationally important habitats and species. The degree of certainty provided is insufficient to satisfy these legal requirements, as acknowledged within the applicant’s documentation itself. This failure directly undermines the fundamental protections afforded to such ecological features under the relevant statutory framework.

Given the applicant’s inability to meet these critical legal standards, the application cannot be considered compliant with the statutory safeguards intended to preserve internationally important ecological assets. Consequently, the case for granting consent is fundamentally weakened, as the necessary assurances for environmental protection remain unsubstantiated. It is therefore appropriate to conclude that consent should not be granted in the absence of clear demonstration that these statutory tests have been satisfied.

1.1.560 Cumulative and In-Combination Effects

The current assessment approach results in a fragmented evaluation of the project, with only a portion before the Scottish Ministers while critical components such as the export cable corridor and onshore transmission works are deferred to later applications. This means that the project cannot be operated as intended without these elements, yet their impacts are excluded from the initial decision-making process. Consequently, the practical effect is that the full range of environmental and operational consequences is never considered in a single, comprehensive assessment.

This piecemeal approach directly contravenes established legal principles, notably those affirmed by the courts in the Raeshaw Farms case. The courts have emphasised that a project must be assessed in its entirety rather than being divided into smaller parts, each of which may appear to have less significant effects when considered in isolation. By deferring important elements to subsequent consenting processes, the present method risks underestimating the cumulative impacts and undermines the integrity of the overall evaluation.

Therefore, it is imperative that the planning process requires a holistic assessment of all components essential to the operation of the wind farm before any determination is made. Assessing the project as a whole ensures compliance with legal precedents and enables a robust, transparent, and informed decision. Without this comprehensive approach, the current assessment framework remains fundamentally flawed and fails to provide adequate scrutiny of the development's full implications.

1.1.561 Public Engagement, Site Selection and Environmental Information

The consultation process surrounding the site-selection for this application has demonstrably failed to meet required standards of effective public participation, thereby undermining the legitimacy of the entire process. The applicant seeks significant weight to be placed on the site-selection process by Scottish Ministers, making the quality of public involvement directly material. However, deficiencies evident during the plan and site-selection stages have persisted into the application phase. The consultation has involved the consideration of many thousands of pages of technical documentation, yet the consultation period coincided with the busiest months for island communities—when residents are engaged continuously throughout the visitor season and access to specialist advice is at its lowest. This contrasts sharply with the applicant's position, having had years and substantial professional and financial resources to prepare its case. Moreover, the requirements of GEN 18 of the National Marine Plan and the principles of effective public participation enshrined in the Aarhus Convention mandate that affected parties must have a realistic opportunity to engage in decisions of this scale. The conditions imposed on the affected communities have fallen short of this standard. It is therefore incumbent on the Scottish Ministers to give careful consideration to these shortcomings when evaluating the representations submitted.

The environmental information presented within the application falls short of the standards required for a thorough Environmental Impact Assessment (EIA), particularly when compared to the robust evidence necessary to inform Scottish Ministers' decisions effectively. While the application does identify potential pathways to significant effects across various topics, it either fails to investigate

these pathways comprehensively or relies upon methodologies that lack the rigor to substantiate the conclusions reached. For example, the landscape assessment produces outcomes based on a distance pattern absent from its own methodology, the heritage assessment does not evidence the application of its prescribed integrity test, and the socio-economic assessment omits a place-based analysis of the affected islands. Such deficiencies undermine the reliability of the environmental evidence and distinguish it unfavourably from the standards of sufficiency required by the EIA Regulations.

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

1.1.562 Effects on Local Area

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

The applicant’s assessment fails to fully recognise the practical consequences for Mull and the Ross of Mull coastal communities, particularly those reliant on tourism. Fionnphort, as the gateway to Iona and the embarkation point for visitors, is acknowledged to experience significant effects. However, beyond this, the communities whose livelihoods depend heavily on the flow of visitors and the integrity of the local seascape receive insufficient consideration, leaving a critical gap in understanding the development’s economic and social impacts.

In terms of landscape and visual effects, the applicant concedes significant impacts on Core Paths and within the Central, South, and West Mull Local Landscape Areas. The Loch na Keal National Scenic Area, noted for its high sensitivity along 21 to 33 kilometres of coastline, is assessed only at a medium magnitude of effect. Similarly, the Ross of Mull South coastal area, despite its high sensitivity at 22 to 24 kilometres and the acceptance of significant effects at key locations such as Erraid, is downplayed by the attribution of only medium magnitude impacts. This approach underestimates the significance of changes to these designated landscapes, which are central to the character and attraction of the area.

The assessment’s reliance on distance-based reasoning, particularly in the treatment of the Wilderness and Gribun Rocks coastal area where viewing distances exceed 30 kilometres, further diminishes the perceived scale of change. This overlooks the fact that Mull’s west-facing tourism economy, including wildlife boat operations and accommodation providers, depends fundamentally on the unspoiled Atlantic seascape which this development would industrialise. Crucially, no place-based assessments have been conducted for these communities, resulting in an incomplete evaluation that neglects the true extent of visual, economic, and community impacts.

1.1.563 Personal Observations

In addition to the planning matters above, I am personally concerned because: This proposal has only negative impacts on the people, flora and fauna of Iona and the surrounding islands. Sea birds and fish will be killed, the isolated beauty of the islands, which rely primarily on tourism and a pristine natural environment, will be destroyed. The beauty, silence and clear horizon of Iona and Mull and their significant cultural heritage will be lost.

Based on my own local knowledge, I also wish to highlight that: The islands of Iona and Mull have significant cultural and spiritual heritage. They are the places where Christianity has lived continuously in Great Britain for over 1,000 years. These places are the birthplace of Christianity in Great Britain. The proposal will ruin the tranquility of this spiritual haven for thousands of tourists, spiritual pilgrims and monastic brethren, and should not continue. The spiritual wellbeing of Mull and Iona is far more valuable than what is proposed to replace it.

Finally, I would also ask the Scottish Ministers to consider: The Christian heritage of Scotland, what their ancestors fought and died for - Christ Himself, the Creator of Life and the natural beauty of the Scottish Islands. Their authority to govern responsibly has been granted by Christ, and they will be held accountable by Christ Himself if that heritage is destroyed.

1.1.564 Summary

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

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

Yours faithfully,

[Redacted]

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

Member of the public 560
Dear Sir/Madam,

I hereby formally register my objection to the MachairWind Offshore Wind Farm proposals, detailed under application numbers 00012385, seeking consent pursuant to section 36 of the Electricity Act 1989, and 00012386, an application for a marine licence under Part 4 of the Marine (Scotland) Act 2010. These applications have been submitted by MachairWind Limited, trading as ScottishPower Renewables. I request that this communication be treated as a formal objection, that my status as an objector be recorded, and that I receive notification of the final determination in respect of these applications.

The proposals envisage the construction and operation of an offshore wind farm with a generating capacity of approximately 2 gigawatts. This would involve the installation of between 91 and 144 wind turbines, each potentially reaching a maximum height of 335 metres to blade tip. The development is planned within a designated Windfarm Development Area encompassing roughly 448 square kilometres of marine space located to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in close proximity to the islands and coastal communities which form part of the southern Hebrides.

In the assessment of these applications, the statutory and policy frameworks provide the essential context for decision-making. It is incumbent upon the applicant to demonstrate, through robust and comprehensive evidence, that all relevant statutory tests and policy requirements have been fully met. This evidential burden lies solely with the applicant; objectors are not obliged to prove the contrary. Upon review of the documentation and supporting material submitted, it is clear that the applicant has failed to satisfy this requirement. Consequently, and for the planning and environmental reasons elaborated below, it is my firm position that consent for both the section 36 consent and the marine licence should be withheld.

1.1.565 Conflict with National Planning Framework 4 and the Development Plan

While NPF4 Policy 11 endorses renewable energy development, this support is conditional upon compliance with its specified impact criteria, notably those set out in Policies 11(c), 11(d), and 11(e), which address effects on communities, landscapes, seascapes, and other receptors. The proposal under consideration fails to meet these critical requirements. It would result in significant adverse impacts on nationally designated landscapes and seascapes, undermining the intrinsic values these areas possess. Furthermore, the proposal does not satisfactorily demonstrate that the cultural significance of scheduled monuments and their surrounding settings would be preserved. Equally, there is insufficient evidence to confirm that the interests and wellbeing of island communities would be adequately safeguarded. Lastly, the ecological assessments submitted do not establish that the necessary environmental tests can be satisfied. Taken together, these shortcomings signify that the proposal is in clear conflict with the impact criteria set out in NPF4 Policy 11, thereby weakening the policy’s intended support for renewable energy development.

The proposal must be assessed against a range of National Planning Framework 4 (NPF4) policies designed to protect nationally important landscapes, heritage assets,

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

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

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

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

1.1.566 Seascape, Landscape and Visual Effects

The practical consequence of the applicant’s assessment methodology is that it underestimates the magnitude of effects on highly sensitive receptors located beyond approximately 20 kilometres from the development area. Despite the absence of any explicit distance threshold in the applicant’s written methodology in Appendix 16.1, an independent Evidence Note, based entirely on the applicant’s own Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern: no highly sensitive receptor beyond this distance is attributed the highest magnitude of change, regardless of its sensitivity or the extent of visibility.

This implicit reliance on distance is further demonstrated within the applicant’s own documents. For example, the assessment of a coastal area situated over 30 kilometres away concludes that the scale of change is small due to the viewing distance. Additionally, the Landscape Character synthesis categorises magnitude as High within roughly 20 kilometres, Medium between about 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. Such gradations, while not explicitly stated as thresholds, effectively moderate the assessment outcomes based on distance.

The consequence of this approach is that protective tests for sensitive designated landscapes, which often lie at or beyond these critical distances, are applied to understated inputs. This systematic moderation of magnitude at key distances undermines the reliability of the conclusions drawn. As a result, the effects described do not provide an accurate or dependable basis for the Scottish Ministers to grant consent for the proposed development.

In considering the visual impact of the proposed development, it is important to acknowledge the limitations of the mitigation measures as they are represented through the submitted visualisation materials. While the applicant has adhered to NatureScot's visualisation guidance, which is a recognised standard, these materials inherently lack the capacity to fully convey the true scale and effect of the development as experienced in situ. This shortcoming is significant when assessing the effectiveness of any proposed mitigation designed to lessen visual intrusion.

NatureScot's guidance explicitly notes that printed visualisations are unable to replicate the scale a viewer perceives in the field. This limitation extends to wireline drawings, which are included within the same panoramic projections and are intended to supplement the photographic images. However, these wireline drawings are themselves technical renderings embedded within the visualisation framework and do not serve as an independent means to correct or enhance the viewer's understanding beyond the constraints of the accompanying photographs. Therefore, reliance on these materials may understate the actual visual impact and the degree to which mitigation measures can be expected to succeed.

Given these inherent constraints, it is prudent to approach the visual assessment with caution and to consider the possibility that the visual effects might be more pronounced than the submitted materials suggest. This underscores the necessity for comprehensive on-site evaluations and a robust consideration of alternative or additional mitigation strategies to address any residual visual effects that may not be fully captured in the visualisation evidence.

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

The proposal, as currently presented, fails to comply with key planning policies designed to safeguard nationally important landscape and seascape interests, resulting in significant practical consequences for the area's environmental integrity. This non-compliance undermines the purpose of these policies, which seek to manage and mitigate adverse effects on valued natural settings. Without adherence to these requirements, the proposal risks causing unacceptable harm to the character and quality of the landscape and seascape, contrary to the intentions of the planning framework.

The applicant’s assessment has not satisfactorily demonstrated that its conclusions regarding the scale of the identified effects align with the methodology it employed. This inconsistency calls into question the reliability of the evaluation and the robustness of any mitigation measures proposed. As a result, there is insufficient evidence to confirm that the project respects the protections afforded by the National Planning Framework 4 (NPF4) Policies 4(c), 4(d), 11(d), and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively aim to ensure that development proposals do not compromise the integrity of nationally significant landscapes and seascapes.

Given these shortcomings, the proposal does not meet the established policy requirements intended to preserve the environmental and visual qualities of the area. To proceed without resolving these issues would be inconsistent with the planning framework’s objectives and could set a concerning precedent for future developments in sensitive locations. Therefore, it is necessary for the proposal to be reconsidered and revised to demonstrate full compliance with the relevant policies before any approval can be justified.

1.1.567 Cultural Landscape, Archaeology and Historic Environment

The applicant’s assessment fails to demonstrate compliance with the required methodology for evaluating impacts on the setting of historic assets, thereby undermining the reliability of its conclusions regarding heritage harm. Although the applicant adopts Historic Environment Scotland’s established methodology—developed through consultation and requiring a specific evaluative step to determine whether changes affect the contribution setting makes to cultural significance and whether the integrity of setting is retained—the published Methodological Audit identifies a critical omission. The Audit, based solely on the applicant’s Appendix 14.3, finds that while the operational assessment describes visual changes such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it does not show how the integrity of setting has been assessed in line with the methodology’s explicit requirement. Instead, the assessment concludes without evidencing this evaluative step, leaving the claimed retention of setting integrity unsubstantiated. This fundamental gap calls into question the robustness of the applicant’s heritage impact conclusions.

The applicant’s assessment acknowledges that the cultural significance of the affected heritage assets stems from experiential qualities such as pilgrimage, arrival by sea, and movement through a living cultural landscape, including the interrelationships between monuments, spirituality, and the surrounding landscape and seascape. However, the proposed mitigation measures appear insufficient in

addressing these dynamic and experiential aspects, as they focus predominantly on fixed viewpoints rather than the broader cultural landscape experienced through movement. This limitation risks an incomplete understanding and inadequate protection of the heritage assets' full significance.

Furthermore, Historic Environment Scotland's consultation responses, as recorded in the application, highlight the need for additional viewpoints to adequately represent these wider cultural qualities. The absence of such comprehensive viewpoints undermines the assessment's ability to capture the nuanced relationships and experiential values critical to the heritage assets. Consequently, the applicant's current approach does not fully reflect the cultural baseline, thereby compromising the robustness of the heritage impact evaluation. It is essential that these broader qualities are properly incorporated to ensure an accurate and respectful appraisal of heritage impacts.

The mitigation measures proposed rely heavily on the findings of the landscape assessment. However, as the landscape effects have been understated, as previously detailed, the heritage impact conclusions that depend on this assessment are similarly compromised. This interdependence means that any deficiency in the landscape evaluation directly undermines the credibility of the heritage conclusions derived from it. Consequently, the overall assessment of heritage impacts cannot be fully relied upon without addressing these fundamental shortcomings in the landscape analysis.

The application fails to demonstrate adequate mitigation measures to protect the cultural significance of internationally and nationally important heritage assets and their settings. Unlike the stringent requirements set out in NPF4 Policy 7(h) regarding scheduled monuments, and Policies 7(c) and 7(d) concerning their setting, the applicant's submission does not provide the necessary assessment or evidence to confirm that these assets will be safeguarded in accordance with these policies. Similarly, the requirements of GEN 6 and the guidance in paragraphs 4.22 to 4.23 of the National Marine Plan are not sufficiently addressed, leaving a significant gap in the protection framework that these policies and plans seek to establish.

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

1.1.568 Effects on Island Communities, Tourism and the Local Economy

There is considerable uncertainty regarding the potential impacts of the proposed development on the fundamental economic and social sustainability of the island communities in question. These communities exhibit an exceptional degree of dependence on visitors, whose presence is closely tied to the intrinsic qualities of the

islands. The applicant's own baseline assessments identify these qualities as including landscape, seascape, cultural heritage, tranquillity and remoteness.

Any alteration to these defining characteristics poses a direct threat to the economic foundations of the island communities. Given that the visitors are drawn specifically by these attributes, changes affecting them could undermine the very reasons for tourism and visitation. This, in turn, risks destabilising the local economy which supports not only businesses but also essential services, infrastructure and employment opportunities within these communities.

The potential consequences extend beyond economic considerations to touch upon the social fabric and long-term viability of the islands' populations. If the qualities that attract visitors are compromised, there is a real danger that the communities' ability to sustain themselves will be jeopardised. It is therefore imperative to approach the proposal with caution, recognising the significant uncertainties surrounding its effects on the islands' unique and delicate balance.

The applicant's own consultants acknowledged habitability as a potentially significant pathway through which the proposal could affect island communities; however, no assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 focuses on regional-level analysis, examining potential port communities in detail, yet it fails to conduct any equivalent place-based assessment of the island communities directly facing the development. Despite this omission, the assessment nevertheless concludes that these island communities exhibit low sensitivity to tourism effects.

This approach is fundamentally flawed. Small island economies are not adequately represented by regional averages, as their economic activity is concentrated in sectors most vulnerable to changes in the very qualities that attract visitors. Furthermore, an increased reliance on visitor numbers does not diminish this sensitivity; rather, it intensifies dependence on those qualities at risk. Therefore, the conclusion of low sensitivity, reached without any place-specific analysis, cannot be regarded as evidence but instead represents an unfounded assumption. Consequently, the socio-economic assessment methodology is insufficient to understand or mitigate the potential impacts on island communities.

The proposal fails to comply with critical policy and statutory requirements designed to protect island communities, as it does not provide the necessary socio-economic evidence mandated by GEN 19 and paragraph 4.81 of the National Marine Plan. These provisions necessitate decisions to be grounded in robust evidence and to adopt a precautionary approach where such evidence is insufficient. Furthermore, the proposal does not meet the standards set out in NPF4 Policy 11(c) or the Islands (Scotland) Act 2018, both of which emphasise that the interests of island communities must be thoroughly assessed and afforded appropriate weight through meaningful engagement from the outset to the conclusion of the decision-making process.

Significantly, the applicant has acknowledged that island communities warrant particular scrutiny but has failed to undertake the necessary assessment to understand how the proposal would affect them. This omission means that the

applicant has not demonstrated compatibility with the principles of sustainable island communities, nor has it discharged the statutory duties owed to these populations. The absence of this critical analysis undermines confidence in the proposal's adherence to essential planning and statutory frameworks.

In light of these substantial shortcomings, the proposal cannot be considered compliant with the required standards for assessing and protecting island communities. It therefore should be refused on the grounds that it fails to meet the legal and policy obligations designed to safeguard the socio-economic wellbeing and sustainability of island communities.

1.1.569 Ecology, Biodiversity and Habitats Regulations

There remains considerable uncertainty regarding the full extent of ecological impacts arising from the proposed development within this sensitive marine environment. The area in question encompasses Priority Marine Features and Annex I habitats, which are recognised for their ecological importance. Moreover, the surrounding waters provide habitat for a range of protected species including seabirds, marine mammals and basking sharks.

The scale of the proposal is significant, with construction, operation and eventual decommissioning activities projected to take place over several decades. Introducing such sustained and large-scale human activity into an environment of high ecological sensitivity raises concerns about potential adverse effects, which have yet to be satisfactorily addressed. The cumulative and long-term consequences on the integrity of the Priority Marine Features and associated species warrant thorough scrutiny.

Given the recognised environmental value of the site and the scale of the proposed works, careful consideration must be given to the potential for significant harm. It is essential that any planning decision fully accounts for the ecological sensitivities and ensures that adequate measures are in place to avoid or mitigate adverse impacts throughout the lifetime of the development.

The applicant's submission includes a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan, specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are indicative of mitigation efforts, aiming to address potential adverse effects on a protected site. Their presence in the application suggests that the applicant acknowledges the possibility of significant impacts and has sought to propose measures intended to offset them.

However, it is important to note that such derogation and compensation documents are typically prepared for circumstances where an adverse effect on site integrity cannot be ruled out. The mere submission of these plans reflects a recognition that the applicant's assessment does not definitively exclude harm to the protected population. This introduces a degree of uncertainty regarding the effectiveness of the proposed mitigation measures and whether they will fully prevent negative consequences.

Furthermore, the applicant's approach implies that the final determination on potential adverse effects rests with the Scottish Ministers, who may arrive at a different conclusion. Consequently, while the submitted documents demonstrate a willingness to engage with the derogation process, this does not guarantee that the proposals will satisfy the necessary statutory tests or that the protected site's integrity will be maintained. It remains essential that these considerations are given due weight in the planning decision.

When considering developments affecting protected habitats and species, it is important to recognise that mitigation measures, compensation proposals, and commitments to future monitoring, while valuable, do not alone satisfy the stringent legal requirements set out under the Habitats Regulations. Unlike mitigation, which seeks to reduce adverse effects, the competent authority must be certain that the development will not adversely affect the integrity of the protected site before consent can be granted. This places a high evidential standard on applicants, requiring more than assurances of future action; it demands demonstrable proof that no reasonable scientific doubt remains regarding potential harm.

This exacting standard is embedded within a robust policy framework. The Habitats Regulations themselves, alongside provisions in GEN 9 and GEN 13 of the National Marine Plan, and Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4), collectively establish a comprehensive approach to safeguarding protected sites. These policies emphasise the need for rigorous assessment and confirmation that development proposals meet the strict derogation tests where applicable, reinforcing that consent can only be lawfully granted when such conditions are unequivocally satisfied.

Accordingly, the onus lies firmly with the applicant to provide compelling scientific evidence that the statutory tests have been met. This responsibility ensures that decision-makers do not rely solely on speculative or provisional measures but instead base consent decisions on conclusive evidence. Maintaining this high threshold is essential to uphold the integrity of protected habitats and comply with the established legal and policy requirements governing such developments.

There remains significant uncertainty as to whether the application meets the necessary statutory tests designed to protect internationally important habitats and species. The evidence submitted, including the applicant's own derogation documents, clearly indicates that the degree of certainty required has not been achieved. Consequently, it has not been demonstrated that these legal requirements can be satisfied, undermining the justification for granting consent.

1.1.570 Cumulative and In-Combination Effects

The current assessment process for the proposed development is fundamentally flawed due to its fragmentation of the project into separate components, thereby precluding a comprehensive evaluation of its overall impacts. At present, only a portion of the project is subject to consideration by the Scottish Ministers, with critical elements such as the export cable corridor and onshore transmission works deferred to subsequent applications. These deferred components are essential for the operation of the wind farm, yet their environmental and planning effects are not

integrated within the principal decision-making process. This piecemeal approach results in the effects of the entire project never being assessed collectively.

Such a methodology is at odds with established legal principles, notably those affirmed by the courts in Raeshaw Farms, which emphasise that a project must be evaluated in its entirety rather than being segmented into smaller parts whose individual impacts may appear less significant. The current approach risks underestimating cumulative effects and undermines the integrity of the consenting process by postponing consideration of key elements until after the principal decision has been made. It is essential for the assessment to encompass all interdependent components to ensure a lawful and thorough evaluation of the project's impacts.

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

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

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

1.1.571 Public Engagement, Site Selection and Environmental Information

There is considerable uncertainty surrounding the adequacy of public participation in the site-selection process, which the applicant urges the Scottish Ministers to weigh heavily. The quality of engagement at both the plan and site-selection stages exhibits notable deficiencies that have persisted into the current application phase. Given the extensive volume of technical documentation—comprising many thousands of pages—and the timing of the consultation during the island communities' busiest months, when residents are occupied with continuous work throughout the visitor season and access to specialist advice is limited, the opportunity for meaningful participation has been severely constrained. This contrasts starkly with the applicant's prolonged preparation period and substantial professional and financial resources.

The importance of effective public participation in decisions of this scale is underscored by GEN 18 of the National Marine Plan and the principles enshrined in the Aarhus Convention. These require that those affected are afforded a realistic opportunity to contribute to the decision-making process. Unfortunately, the circumstances under which the local communities have been expected to respond fall short of these established standards.

In light of these concerns, it is essential that the Scottish Ministers give careful consideration to the limitations of the consultation process when evaluating the representations submitted. The legitimacy of the site-selection process depends significantly on ensuring that public participation is both meaningful and accessible, and this has not been demonstrably achieved in the present case.

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

1.1.572 Effects on Local Area

The proposed development encompasses a substantial 448 square kilometre area situated immediately north-west of Islay and west of Colonsay, placing these islands in closest proximity to the project site. Despite this, the applicant’s assessment predominantly considers Islay in terms of its potential as a direct project location rather than as a distinct affected community. This approach fails to provide a place-based evaluation of the development’s effects on Islay’s Atlantic-facing communities, whose daily lives and local economy would be directly influenced by the nearest edge of the development area. Consequently, the assessment does not adequately address the considerable and direct impact on the setting, community life, and economic activities of Islay’s residents.

For Colonsay and Oronsay, the situation is equally concerning. The islands’ seaward outlook, integral to their daily existence, faces the development array directly. Notably, the North Colonsay and Western Cliffs Special Protection Area, located along Colonsay’s coastline, is central to the applicant’s derogation case and compensation plan, which implicitly acknowledges that harm to the internationally protected seabird population cannot be ruled out. Additionally, Oronsay Priory, a scheduled monument of national importance within this community, has an open maritime setting that the heritage assessment inadequately addresses, mirroring the

gaps identified elsewhere in the application. Collectively, these shortcomings undermine the reliability of the environmental and heritage impact evaluation for Islay, Colonsay, and Oronsay, as the applicant's assessment does not sufficiently capture the direct and significant effects on these island communities, their economy, and their heritage assets.

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

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

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

The applicant's assessment fails to adequately recognise the practical consequences of the proposed development on the coastal communities and landscapes of Mull and the Ross of Mull. Notably, Fionnphort—serving as the gateway to Iona and the embarkation point for visitors—is acknowledged by the applicant as being significantly affected. This community relies heavily on the flow of tourists, and any adverse visual or experiential impact here would have immediate economic repercussions. Similarly, significant effects are accepted at Erraid and along the Core Paths of the Ross, areas integral to both local identity and visitor experience, yet these impacts are not fully explored in terms of their wider community implications.

Across the island of Mull, the applicant concedes significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is categorised as having high sensitivity at distances of approximately 21 to 33 kilometres. Despite this, the applicant attributes only a medium magnitude of effect, which understates the true visual and environmental impact on this nationally designated landscape. This approach neglects the cumulative significance that such visual intrusions would have in a context recognised for its natural beauty and recreational importance.

Moreover, the assessment's treatment of the Wilderness and Gribun Rocks coastal area exemplifies an overreliance on distance-based reasoning. The applicant dismisses potential effects on this area—where viewing distances exceed 30 kilometres—by classifying the scale of change as small. This simplification ignores the fact that Mull's west-facing tourism economy, including wildlife boat operations and accommodation providers in its western townships, depends fundamentally on the integrity of the Atlantic seascape. The industrialisation of this seascape by the proposed development would harm these communities, none of which have received a place-based assessment to address their specific vulnerabilities. Taken together, these shortcomings indicate that the applicant's evaluation does not sufficiently account for the significant visual, economic, and community impacts on Mull and the Ross of Mull.

The applicant's assessment significantly underestimates the impacts on designated landscapes and vulnerable island communities, resulting in inadequate protection of their natural and cultural qualities. Notably, Ulva, a community-owned island within the Loch na Keal National Scenic Area, is at the outset of its regeneration. This small, re-establishing community relies fundamentally on the unspoilt seascape and setting, yet the applicant has made no assessment of the effects on Ulva, overlooking a critical aspect of local recovery and sustainability.

Further, Staffa, also within the Loch na Keal National Scenic Area and one of Europe's most renowned small islands, lies approximately 35 kilometres from the development site. This distance exceeds the 30-kilometre range within which NatureScot requested an assessment of effects on National Scenic Area qualities. Despite acknowledging the island's panoramic maritime qualities, the applicant concludes that changes there would be small and not significant, a position that fails to fully recognise Staffa's exceptional status and sensitivity.

Similarly, the Jura National Scenic Area, situated about 28 to 32 kilometres from the site, is judged to have only medium to low magnitude effects due to distance and retained landforms, despite its designation emphasising its wild, undeveloped Atlantic outlook. The Scarba, Lunga, and Garvellachs National Scenic Area, at 35 to 40 kilometres distance, receives comparable treatment. Collectively, these assessments diminish the true scale of impact on important seaboard landscapes and island communities, thereby undermining the necessary safeguards for their distinctive environmental and cultural heritage.

The applicant's Environmental Statement assesses the South Tiree coastal area, situated approximately 35 kilometres from the proposed development, as having

High sensitivity but attributes a Low magnitude of change to the effects on this landscape. This combination underpins their overall evaluation of the impact on Tiree's coastal character.

However, Tiree's landscape is uniquely defined by its exceptionally low-lying topography, with the highest point, Ben Hynish, reaching only 141 metres. The island's character derives from the dominance of sea and sky and an open oceanic horizon. Introducing turbines of up to 335 metres in height would result in vertical elements unprecedented in the seascape. Such large-scale structures would fundamentally alter the visual and experiential qualities of the landscape.

Given this context, the conclusion of a Low magnitude of change appears to significantly understate the true extent of impact on Tiree's sensitive and distinctive landscape character. This understatement calls into question the reliability of the applicant's assessment, which fails to fully reflect the magnitude of change likely to be experienced by this highly sensitive receptor.

While the applicant's assessment applies a distance-based moderation to mitigate the visual effects of the proposed development, this approach inadequately addresses the significant impacts on mainland and island communities with direct views and economic dependence on the seascape. The assessment notably omits any examination of Gigha, a community-owned island renowned nationally for its regeneration following purchase by its residents. Facing the development from the east, Gigha's finely balanced community and economy are vulnerable to unassessed effects, undermining the completeness of the applicant's evaluation.

Similarly, Ardnamurchan Point, the most westerly point of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors along the entire peninsula. These seaward panoramas are precisely the receptors for which the applicant's distance-based mitigation is applied, yet the assessment fails to fully consider their sensitivity. The west coast of Kintyre and its chain of communities, whose character and visitor economy are shaped by the open Atlantic seaboard towards Islay, Jura, and adjacent waters, likewise remain unassessed. The Treshnish Isles and other small islands and mainland coasts with views towards the development area share this position, further evidencing a significant gap in the applicant's assessment and calling into question its comprehensiveness and reliability.

The applicant's reliance on a distance-based approach to assessing environmental effects results in a systematic underestimation of impacts on sensitive receptors located beyond 20 kilometres. This method moderates the magnitude of change and discounts the significance of effects simply due to their distance from the project, leading to a practical consequence whereby substantial adverse impacts are effectively overlooked. Such an approach fails to provide a robust or accurate appraisal of the true extent of harm experienced by distant communities.

Critically, this approach means that communities beyond the 20-kilometre threshold have not been subject to any place-based assessment, despite potentially experiencing significant effects. The absence of site-specific evaluation undermines the integrity of the environmental impact assessment and disregards the lived

experience of these populations. Without a thorough, locally grounded analysis, the assessment cannot be relied upon to inform decision-making adequately or to protect the interests of all affected parties.

Therefore, it is essential that the assessment methodology be revised to recognise and properly evaluate the effects on sensitive receptors regardless of distance. Only through a more comprehensive and nuanced approach can the environmental impact assessment fulfil its purpose of accurately identifying and mitigating harm, thereby ensuring a fair and transparent planning process.

1.1.573 Personal Observations

In addition to the planning matters above, I am personally concerned because: Yes. I live in Argyll and will be affected by the impact on the environment and nature around the isles and coast. I work in hospitality and this will have an impact and will destroy livelihoods across the area. There is a unique beauty at risk that will be decimated.

Based on my own local knowledge, I also wish to highlight that: We are custodians and should respect the natural world around us. The island economies are fragile and this could ultimately have a similar impact as the clearances

1.1.574 Summary

The proposal submitted by the applicant fails to establish compliance with the relevant statutory and policy frameworks governing its determination. The applicant's own assessment acknowledges significant impacts on nationally designated landscapes, as well as on the communities and heritage along this coastal area. Furthermore, independent evaluations of the applicant's documentation reveal that the extent of these impacts has been underestimated. Crucially, the necessary heritage assessment has not been conducted, and while effects on the island communities involved were identified, they have not undergone proper evaluation. Additionally, the ecological requirements have not been demonstrated as achievable, and the application before the Scottish Ministers represents only a portion of the overall project.

In light of these shortcomings, it is respectfully urged that the Scottish Ministers decline to grant consent for the MachairWind Offshore Wind Farm, alongside refusal of the related marine licence. Should the Ministers consider an alternative course, it is requested that they require the submission of further environmental information and enhanced visual representations. It is also proposed that the determination of the applications be deferred until after a public inquiry, thereby ensuring comprehensive scrutiny of the issues raised in this objection. Regardless of the final decision, it is further requested that the Ministers explicitly address and conclude on the impacts to cultural heritage and the affected island communities within their official reasoning.

Yours faithfully,

[Redacted]

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

Member of the public 561
Dear Sir/Madam,

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

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

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

1.1.575 Legislative and Policy Framework

The application must be refused because it fails to provide the legally required environmental impact assessment and habitats regulations assessment. Under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, the likely significant environmental effects of the proposal must be identified, assessed, and reported before any determination is made. This statutory requirement has not been met. Furthermore, the Habitats Regulations mandate that the effects of the proposal on European protected sites be assessed in accordance with the applicable statutory tests. The evidence before the determining authority does not demonstrate compliance with these obligations. Where such compliance is absent, or where deficiencies, omissions, or conflicts with the legal and policy framework are evident, these factors weigh decisively against granting consent. In this case, the failure to satisfy these fundamental legal requirements renders the application unacceptable and justifies refusal.

The applicant’s submission fails to demonstrate compliance with the requirements set out in the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be considered and afforded due weight throughout the decision-making process. The evidence provided does not show that these statutory obligations have been met, nor does it address how the proposal impacts island

communities in a manner consistent with the Act's provisions. This omission represents a fundamental procedural deficiency in the application, as the statutory framework explicitly requires that such considerations be integral to the assessment and determination of planning proposals affecting island areas.

Given that compliance with the Islands (Scotland) Act 2018 has not been demonstrated, and the evidence identifies clear omissions in addressing the interests of island communities, these failings constitute a direct conflict with the applicable legal and policy framework. Under the established legal principles, where such deficiencies exist, they must weigh against the granting of consent. Therefore, the proposal should be refused on the basis that it does not properly consider or give due weight to the interests of island communities as required by the Islands (Scotland) Act 2018.

1.1.576 Seascape, Landscape and Visual Effects

The applicant's assessment methodology, as set out in Appendix 16.1, notably lacks a defined distance threshold beyond which major effects are deemed to cease. However, an independently prepared Evidence Note, which analyses the applicant's Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of its intrinsic sensitivity or visibility extent. This pattern is further substantiated by the applicant's own documentation, which acknowledges distance as a critical factor in effect judgements. For example, a coastal area situated over 30 kilometres away is assessed with a scale of change judged as small due to viewing distance, while the Landscape Character synthesis identifies High magnitude effects within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types.

This implicit distance-based moderation in effect magnitude has significant implications for the reliability of the assessment's conclusions. By systematically reducing magnitude ratings at distances coinciding with the locations of the most sensitive designated landscapes, the methodology inherently understates potential impacts. Consequently, the protective tests applied by decision-makers are based on inputs that do not fully capture the extent of change experienced by these sensitive receptors. This methodological approach undermines confidence in the assessment's ability to accurately describe the effects for which Scottish Ministers are being asked to grant consent.

When comparing the proposed mitigation measures, it is important to recognise that the visualisation materials submitted in support of the assessment possess inherent limitations that affect their reliability as a tool for fully understanding visual impacts. NatureScot's visualisation guidance, which the applicant has followed, explicitly states that printed visualisations cannot replicate the true scale perceived by a viewer in the field. This fundamental shortcoming means that any mitigation strategies evaluated primarily through such visualisations may not reflect the actual visual experience on site.

Furthermore, the wireline drawings included within the panoramic projections are subject to the same constraints as the accompanying photography. They serve as a technical rendering within the overall visualisation package rather than functioning as an independent means to correct or enhance visual accuracy. Consequently, reliance on these materials without acknowledging their technical and perceptual limitations risks underestimating or misrepresenting the visual effects of the development. This calls for caution in drawing firm conclusions from the visual evidence as currently presented.

The introduction of aviation and navigation lighting to a previously unlit sea horizon would result in a permanent alteration of the night-time seascape character for the proposed 35-year operational life of the development. This change is not merely a temporary inconvenience; it represents a fundamental and enduring transformation of the seascape's intrinsic qualities. Moreover, the temporal limitation of 35 years does not mitigate the policy harm, as consenting to this development effectively endorses the suitability of this seascape for wind farm use, thereby setting a precedent that may influence future decisions. In closing, the significant and lasting impact on night-time seascape character must be carefully weighed against policy objectives, with clear recognition that approval equates to a substantive shift in the seascape's status and use.

1.1.577 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of effects on the setting of historic assets is stated to follow Historic Environment Scotland's recognised methodology, which has been developed and refined in consultation with that body. This methodology requires an evaluation of whether changes to the setting affect the contribution that setting makes to the cultural significance of heritage assets, and whether the integrity of the setting is adequately retained. Importantly, it is made clear that visual change alone should not be directly equated with adverse impact.

However, a detailed Methodological Audit, prepared to support community objections and working solely from the applicant's Appendix 14.3, reveals significant shortcomings in how the applicant's assessment has been conducted. While the operational assessment identifies relevant heritage attributes, it fails to demonstrate how the integrity of the setting has been evaluated in accordance with the applicant's own accepted methodology. The assessment focuses primarily on describing visual change—discussing factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—before concluding that the integrity of the setting is adequately retained. Crucially, the Audit finds that the essential evaluative step required by the methodology is absent in all of the examined worked examples.

This omission undermines the reliability of the applicant's conclusions regarding heritage impacts, as the assessment does not adequately apply the prescribed methodological framework to determine whether the setting's contribution to cultural significance is materially affected. Consequently, the assessment's integrity and the robustness of its findings on heritage impacts must be called into question.

The practical consequence of the applicant's approach is that the assessment may underrepresent key aspects of the cultural significance of the heritage assets in question. The applicant's own baseline acknowledges that this significance arises not merely from static features but from dynamic qualities such as pilgrimage routes, arrival by sea, movement through an active cultural landscape, and the interrelationships among monuments, spirituality, and the encompassing landscape and seascape. These elements are experienced through movement rather than from fixed viewpoints, indicating a broader and more immersive cultural context that should be central to any impact evaluation.

Furthermore, Historic Environment Scotland's consultation responses, as recorded within the application, highlight this deficiency by requesting additional viewpoints to ensure these wider experiential qualities are properly represented. This suggests that the current assessment falls short of capturing the full scope of the heritage assets' cultural landscape. Without addressing these concerns, the appraisal risks providing an incomplete understanding of the heritage impacts, potentially leading to mitigation measures that do not fully respect or preserve the assets' cultural significance. It is therefore necessary to incorporate these broader landscape and experiential factors into the assessment to achieve a more comprehensive and accurate evaluation.

The heritage impact conclusions presented rely fundamentally on the landscape assessment. As identified, the landscape effects have been understated, as previously detailed. This understatement directly affects the reliability of the heritage conclusions, which are predicated on the landscape findings. Consequently, the deficiencies within the landscape assessment critically undermine the credibility of the heritage impact evaluation. It follows that without a robust and fully accurate landscape assessment, the heritage conclusions cannot be considered sound or dependable.

1.1.578 Effects on Island Communities, Tourism and the Local Economy

Mitigation measures proposed in support of the development fail to adequately address the fundamental reliance of the island communities on the qualities that attract visitors. While attempts may be made to reduce direct environmental impacts, such efforts cannot compensate for the profound alteration to the landscape, seascape, cultural heritage, tranquillity, and remoteness that underpin the islands' appeal. The applicant's own baseline assessments confirm these attributes as key visitor draws, yet the proposal would inevitably diminish them in ways that cannot be fully mitigated.

This dependence is exceptional and integral to the economic and social sustainability of the island communities. Any adverse change to these visitor-attracting qualities strikes at the very economic base of these communities, undermining not only local services and employment but also population retention and overall community viability. The proposal therefore presents a significant threat to the long-term sustainability of the islands, a risk that cannot be offset by partial mitigation measures.

The applicant's own consultants identified habitability as a potentially significant pathway through which the proposal could impact island communities; however, no assessment of habitability for the affected islands was subsequently undertaken. Instead, the socio-economic assessment presented in Chapter 18 focuses primarily at a regional level, offering detailed examination of potential port communities while neglecting any equivalent place-based analysis for the island communities directly facing the development. Despite this omission, the assessment concludes that these island communities are of low sensitivity to tourism effects.

This conclusion is fundamentally flawed. Small island economies differ markedly from regional averages because their economic activity is concentrated in the very sectors most vulnerable to alterations in the qualities that attract visitors. Rather than mitigating sensitivity, a reliance on increasing visitor numbers intensifies dependence on these qualities, making such communities particularly susceptible to any adverse changes. Therefore, the assertion of low sensitivity, reached without any place-based analysis of the islands themselves, cannot be regarded as evidence but must instead be understood as an unsupported assumption.

In summary, the applicant's socio-economic assessment methodology is inadequate to properly understand or mitigate impacts on island communities. The lack of targeted habitability assessment and the unwarranted conclusion of low sensitivity undermine confidence in the appraisal and the measures proposed. Consequently, the assessment fails to meet the necessary standard of rigour required to inform decision-making affecting these vulnerable island populations.

1.1.579 Ecology, Biodiversity and Habitats Regulations

The development area and its surrounding waters are of considerable ecological importance, containing Priority Marine Features and Annex I habitats within the site itself. This environment also supports a range of protected species, including seabirds, marine mammals and the basking shark, all of which are sensitive to disturbance.

The proposed development would introduce extensive construction, operational and decommissioning activities on a very large scale, persisting for decades. Such prolonged and intensive activity poses a significant risk of adverse environmental effects on these important marine features and protected species, warranting careful and thorough consideration.

The practical consequence of the applicant's submission of a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan is that it acknowledges the potential for adverse effects on the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are specifically prepared to address situations where an adverse effect on the integrity of a protected site cannot be definitively ruled out. The submission of such materials is therefore a significant element of the application. Notably, the applicant's own approach implies that the Scottish Ministers may ultimately reach a different conclusion regarding the presence or absence of adverse effects. In summary, the applicant's provision of these derogation and compensation documents confirms

recognition of possible impacts on a protected site and signals an intention to mitigate these impacts in accordance with derogation provisions.

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

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

There remains significant uncertainty as to whether the application complies with the statutory requirements designed to safeguard internationally important habitats and species. The evidence submitted, notably the applicant's own derogation documents, clearly indicates that the necessary degree of certainty to satisfy these statutory tests has not been achieved. This failure to demonstrate compliance fundamentally undermines the justification for granting consent, as the legal protections for these ecological features must be upheld without compromise. Consequently, in light of this unresolved doubt, the application should not be approved.

1.1.580 Cumulative and In-Combination Effects

The current approach to assessing the project is fundamentally flawed because it only considers a portion of the development before the Scottish Ministers, while deferring critical components such as the export cable corridor and the onshore transmission works to later applications. These deferred elements are essential for the operation of the wind farm, yet their impacts are not evaluated alongside the principal works. This fragmented assessment results in the effects of the entire project never being examined collectively. Such piecemeal consideration undermines the integrity of the planning process and conflicts with established legal principles. Notably, the courts in Raeshaw Farms have affirmed that a project must be assessed in its entirety rather than being artificially divided into smaller parts to downplay the overall impact. Consequently, the current method of separating key elements into subsequent consenting processes after the main decision has been made is contrary to this principle. In summary, the incomplete project assessment arising from deferred elements is both legally and procedurally unsound, preventing a comprehensive evaluation of the project's full effects.

The practical consequence of relying on the cumulative assessments as presented is that the true combined effects of the proposed development, alongside other

existing, consented, and foreseeable projects, are significantly underestimated. This underestimation arises directly from the baseline conditions established in the Environmental Impact Assessment, which have been shown to understate the effects on landscape, heritage, and socio-economic factors. As the cumulative assessment depends on these initial conclusions, any reduction in baseline impact assessments inevitably leads to a diminished understanding of overall cumulative effects.

Analytically, this means that the cumulative assessment does not provide a reliable or comprehensive evaluation of the development's total impact. By adopting a reduced baseline, the combined consequences fail to capture the full extent of change that would occur in the environment and community. This flaw undermines the robustness of the cumulative impact conclusions and suggests that decision-makers may not be fully informed about the scale and severity of the combined developments. Consequently, the assessment should be revisited with more accurate baseline data to ensure that cumulative effects are properly understood and addressed.

The applicant's submission fails to meet the mitigation requirements set out in GEN 21 and paragraph 4.85 of the National Marine Plan, as well as NPF4 Policy 11(e), particularly regarding the assessment of cumulative and in-combination effects. Unlike the standards expected under the EIA Regulations to prevent project splitting, the proposal does not provide a reliable identification or comprehensive assessment of the project's overall environmental impact. This omission undermines the ability to compare the mitigation measures effectively and assess their adequacy in addressing the full scale of potential effects.

Furthermore, the application does not explicitly consider the implications of deferred works within its assessment, which is essential for a robust determination. Without a clear and thorough evaluation of these deferred components, the decision-making process lacks a complete understanding of the project's cumulative environmental consequences. It is therefore requested that the treatment of deferred works be expressly addressed to ensure full compliance with planning policies and regulatory requirements before any approval is granted.

1.1.581 Effects on Local Area

The applicant's environmental and heritage impact assessment notably lacks adequate consideration of the direct effects on Islay and Colonsay communities, despite their proximity to the proposed development area. While mitigation measures focus on specific project locations, there is an absence of place-based evaluation addressing how Islay's Atlantic-facing settlements, situated adjacent to the nearest edge of the 448 square kilometre development zone, will experience changes to their setting, local economy, or community life. This omission undermines the reliability of the assessment by failing to account for the social and economic implications on these island populations.

Furthermore, for Colonsay and Oronsay, the daily seaward outlook, integral to their identity, faces the development directly. The North Colonsay and Western Cliffs Special Protection Area, located on Colonsay's coastline, is central to the applicant's

derogation case and compensation proposals, implicitly acknowledging that harm to the internationally protected seabird populations cannot be ruled out. Additionally, Oronsay Priory, a scheduled monument of national significance within this community, is inadequately assessed, particularly regarding the impact on its open maritime setting. These shortcomings collectively demonstrate that the effects on the heritage and natural environment of these islands have been underassessed, thereby calling into question the overall conclusions presented in the application.

The applicant's assessment notably underestimates the scale and significance of the visual, community, and heritage impacts on Iona, resulting in an incomplete evaluation of environmental and social effects that cannot be adequately mitigated. The Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity, with direct orientation towards the development and extensive visibility across a large geographical extent. The overall effect is described as moderate and significant, with turbines visible over approximately 21 kilometres, spanning around 39 degrees of the horizon, including impacts on the ferry crossing between Fionnphort and Iona. Similarly, the West Coast of Iona is assessed as highly sensitive with widespread visibility; the applicant acknowledges significant effects on residents and visitors throughout much of the island, including at Dùn Ì, its highest point.

Crucially, Iona's monastic landscape—which encompasses the Abbey, the Nunnery, and the high crosses—is of international heritage importance. Its significance is closely tied to pilgrimage, arrival by sea, and movement through the landscape, as established in the applicant's own baseline studies. Historic Environment Scotland requested additional viewpoints from sensitive locations, including the ferry crossing itself; however, the applicant failed to provide visualisations from elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, leaving a critical gap in understanding the full visual impact on this heritage setting. Furthermore, a household consultation on Iona revealed that 92 per cent of respondents object to the proposal, yet the applicant's consultants did not assess habitability—a potential pathway of effect on the community identified in their own reports.

The perceived scale of the turbines can be contextualised by comparison with a familiar local landmark: Ben Hynish on Tiree stands at 141 metres and is visible from Iona at approximately 33 kilometres. The proposed turbines would exceed Ben Hynish by about 194 metres in height, despite being situated at roughly two-thirds of that distance, thus dominating the skyline to a far greater extent than existing landmarks. Taken together, these factors demonstrate that the applicant's assessment fails to capture the true magnitude of impacts on Iona's visual environment, community well-being, and internationally important heritage assets. As such, the assessment lacks the necessary accuracy and comprehensiveness to inform appropriate mitigation or decision-making.

The applicant's assessment underestimates the practical impacts on the coastal communities and landscapes of Mull and Ross of Mull, particularly regarding their tourism-dependent economies and designated scenic areas. For instance, the Ross of Mull South coastal area is acknowledged as highly sensitive and experiences significant effects at key locations such as Erraid and the Core Paths of the Ross. Fionnphort, serving as the gateway to Iona and a crucial embarkation point for

visitors, is identified as the community most directly affected by visitor flows, yet no dedicated place-based assessment has been provided for it. Similarly, significant effects are accepted across Mull's Core Paths and within important local landscape areas, including the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, recognised for its high sensitivity throughout a viewing range of 21 to 33 kilometres, is only attributed medium magnitude effects, which does not fully reflect the potential for adverse impacts. The applicant's reliance on distance as a primary factor, such as in the case of the Wilderness and Gribun Rocks coastal area where changes at over 30 kilometres are deemed small, oversimplifies the complex visual and experiential qualities that contribute to these landscapes' value. Moreover, the west-facing tourism economy, including wildlife boat operations and accommodation sectors reliant on the Atlantic seascape, faces potential industrialisation from the development, yet none of these communities have been afforded a place-specific assessment. This gap in the evaluation risks overlooking significant economic and community consequences that should be carefully considered in the planning decision.

The applicant's assessment acknowledges potential effects on several designated landscapes within the wider seaboard area, including the Loch na Keal National Scenic Area, where Ulva and Staffa are located. Ulva, a community-owned island at the initial stages of regeneration, lies within this National Scenic Area and shares fully in the effects identified for that designation. The island's recovery is closely tied to the preservation of its unspoilt seascape and setting, yet the applicant's assessment does not include any specific evaluation of impacts on this vulnerable community. Similarly, Staffa, situated about 35 kilometres from the development site and beyond the approximate 30-kilometre distance for which NatureScot requested an assessment, is noted by the applicant to experience only small-scale change with no significant effect. This conclusion is reached despite the acceptance within the applicant's own analysis of Staffa's panoramic maritime qualities, which are among the most celebrated in Europe.

The Jura National Scenic Area, lying roughly 28 to 32 kilometres from the development, is assessed by the applicant as having high sensitivity but is attributed only a medium to low magnitude of impact. This moderation in effect is justified by the applicant on the basis of distance, the apparent scale of the development, and the retention of existing landforms. However, this approach does not fully consider that the Jura designation fundamentally reflects its wild, undeveloped character and Atlantic outlook, qualities that could be compromised even by moderate changes in the seascape. Similarly, the Scarba, Lunga and Garvellachs National Scenic Area, located approximately 35 to 40 kilometres away, is treated with the same assessment rationale, potentially underestimating the significance of impacts on these sensitive landscapes.

Overall, the applicant's evaluation appears to underestimate or omit significant effects on important designated landscapes and the vulnerable island communities that depend on them. The absence of a dedicated assessment for Ulva, the reliance on distance thresholds that exclude notable features such as Staffa, and the moderate attribution of impact magnitude to areas designated for their wild and undeveloped character all raise concerns about the adequacy of the protection afforded to these natural and cultural qualities. Such omissions and

underestimations could undermine the long-term preservation and regeneration prospects of these communities and landscapes, warranting a more comprehensive and nuanced consideration in the planning process.

The applicant's assessment categorises the South Tiree coastal area as having High sensitivity at a distance of approximately 35 kilometres, yet attributes only a Low magnitude of change to the proposed development. This characterisation warrants further scrutiny. Tiree is an exceptionally low-lying island, with its landscape character fundamentally shaped by the dominance of sea and sky. Its highest elevation, Ben Hynish, reaches merely 141 metres above sea level. Given this context, the introduction of turbines up to 335 metres in height would represent vertical elements unprecedented within Tiree's open oceanic horizon. Such structures would inevitably alter the island's distinctive seascape character in a manner far more substantial than the assessment acknowledges. Therefore, the conclusion of a Low magnitude of change for a receptor as exposed and sensitive as Tiree appears to significantly understate the true magnitude of impact, undermining the reliability of the overall evaluation.

The applicant's assessment notably omits consideration of significant effects on mainland and island communities that have direct visual and economic connections to the seascape in question. Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by residents, faces the development waters from the east. Despite its finely balanced community and economy, the potential impacts on Gigha have not been examined. Similarly, Ardnamurchan Point, the most westerly point of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas represent precisely the type of receptors that are subject to undue distance-based moderation within the applicant's assessment, thereby undervaluing their sensitivity. Additionally, the west coast of Kintyre comprises a chain of communities whose outlook, character, and visitor economy are intrinsically linked to the open Atlantic seaboard facing Islay, Jura, and the surrounding waters. The Treshnish Isles and other small islands and mainland coasts with views towards the development area share this same reliance and exposure. The failure to address the effects on these communities compromises the comprehensiveness and robustness of the applicant's environmental and socio-economic evaluation, raising concerns over the completeness of the submitted evidence.

The applicant's environmental impact assessment systematically applies a distance-based approach that moderates and discounts effects beyond approximately 20 kilometres, leading to a consistent underestimation of significant impacts on sensitive receptors. This methodology results in a failure to undertake any place-based assessment for communities located beyond this threshold, despite their exposure to noteworthy changes. Taken together, these observations establish a clear proposition: the approach adopted inherently diminishes the recognition of effects on distant yet highly sensitive receptors, thereby undermining the integrity and comprehensiveness of the assessment. Consequently, the environmental impact assessment cannot be regarded as robust or reliable in its current form.

1.1.582 Personal Observations

Based on my own local knowledge, I also wish to highlight that: No

1.1.583 Summary

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

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to reject the associated marine licence application. Should the Ministers be inclined not to refuse consent outright, I request that they mandate the provision of further environmental information alongside enhanced visualisations. I further propose that determination of the applications be deferred until after a public inquiry, enabling a thorough examination of the issues raised in this objection. Regardless of the decision reached, I ask that the Ministers explicitly address and record their conclusions regarding the project’s effects on cultural heritage and the impacted island communities within their formal reasons.

Yours faithfully,

[Redacted]

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

Member of the public 562
Dear Sir/Madam,

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 pursuant to Part 4 of the Marine (Scotland) Act 2010, both lodged by MachairWind Limited, trading as ScottishPower Renewables. I request that this correspondence be recorded as an official representation, that I be registered accordingly as an objector, and that I be informed of the outcomes relating to these applications.

The proposed development involves the installation of an offshore wind farm with an anticipated generating capacity of approximately 2 gigawatts. This would encompass between 91 and 144 wind turbines, each with a maximum height reaching up to 335 metres to blade tip. The designated Windfarm Development Area extends over roughly 448 square kilometres of marine environment situated to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in proximity to the islands and coastal communities within the southern Hebrides.

The following sections articulate the planning and environmental grounds underpinning this objection, framed within the statutory and policy context relevant to the determination of the applications. It is pertinent to emphasise that the applicant bears the onus of proof, tasked with demonstrating through robust evidence that all applicable tests and criteria are met. The role of objectors is not to establish contrary evidence but to challenge the sufficiency of the applicant’s submissions. Having examined the proposals in detail, it is clear that the applicant has failed to meet this evidential burden. Consequently, the applications should be refused consent.

1.1.584 Legislative and Policy Framework

The application fails to demonstrate adequate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989, which require the applicant to have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, as well as protecting sites, buildings, and objects of architectural, historic, or archaeological interest. The applicant is also obliged to take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. This fundamental requirement has not been satisfactorily addressed in the submitted documentation.

Furthermore, the Scottish Ministers, as the determining authority, are mandated to have regard to these same statutory duties when deciding on the application. The evidence before the authority reveals deficiencies and omissions in how these duties have been considered and fulfilled. The absence of clear demonstration of compliance with these legal obligations constitutes a significant procedural and substantive failing in the application process.

Given these shortcomings, and in accordance with established legal and policy principles, the failure to meet the statutory duties under Schedule 9 weighs decisively against the granting of consent. The application should therefore be

refused on the basis that it does not adequately address the statutory requirements imposed by the Electricity Act 1989.

The application fails to provide the requisite Environmental Impact Assessment (EIA) and Habitats Regulations Assessment (HRA) as mandated by law, thereby precluding any lawful determination in its favour. Under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations, it is a statutory requirement that the likely significant environmental effects of the proposal be identified, assessed, and reported prior to any decision. This fundamental procedural obligation has not been met.

Furthermore, the Habitats Regulations impose a clear duty to assess the effects of the proposal on European protected sites in accordance with the applicable statutory tests. The absence of such an assessment constitutes a direct failure to comply with these legal requirements. The evidence confirms that compliance has not been demonstrated, and there are identifiable deficiencies and omissions in the environmental information submitted.

Given these material shortcomings and conflicts with the established legal and policy framework, the proposal cannot be considered compliant with statutory environmental safeguards. Consequently, these failures weigh decisively against the granting of consent.

The applicant’s submission fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be considered and given due weight in the decision-making process. The evidence provided does not show that these statutory obligations have been met, nor does it address how the proposal accounts for the specific needs and circumstances of island communities as required by the Act.

Given the absence of demonstrated compliance and the presence of deficiencies and omissions in the consideration of island community interests, the proposal conflicts with the applicable legal and policy framework. In accordance with the established guidance, such failures weigh decisively against the granting of consent for this development.

The applicant has failed to dispel fundamental uncertainties regarding compliance with the full spectrum of statutory duties, planning policies, and environmental assessment requirements. The evidential submissions do not constitute robust, objective, and proportionate proof that every relevant legal and policy obligation has been met. This absence of comprehensive demonstration leaves critical questions unresolved about whether the proposal aligns with the mandatory frameworks governing the development. Such uncertainty undermines the confidence necessary for lawful decision-making and precludes any finding that the proposal satisfies the requisite legal standards.

Moreover, the evidence presented reveals clear deficiencies and omissions in addressing applicable statutory and policy criteria. These shortcomings amount to a failure to discharge the applicant’s burden of proof, as established by the governing

principles that place responsibility squarely on the applicant to demonstrate compliance. In accordance with established planning law and policy, where compliance is not demonstrated or where conflicts with the legal and policy framework are evident, these factors must weigh decisively against the grant of consent. Given the unresolved evidential gaps and the absence of conclusive proof of conformity, the proposal cannot be considered compliant and must therefore be refused.

1.1.585 Conflict with National Planning Framework 4 and the Development Plan

While the proposal might attempt to mitigate some impacts, it nonetheless fails to meet the stringent requirements set out in NPF4 policies that safeguard nationally important assets. Policy 11 must be read in conjunction with Policy 4(c) and 4(d), which protect National Scenic Areas and nationally important landscapes from significant adverse effects, as well as Policy 7—including 7(h) on scheduled monuments and 7(c) and 7(d) relating to the setting of historic assets—and Policy 3 on biodiversity. The evidence demonstrates that the proposal would cause significant adverse effects on these nationally designated landscapes and seascapes. Furthermore, there is no satisfactory demonstration that the cultural significance of scheduled monuments and their settings would be preserved, nor that the interests of island communities would be adequately safeguarded. Crucially, the ecological tests required under Policy 3 have not been shown to be met on the basis of the submitted evidence. Accordingly, the proposal conflicts with multiple core NPF4 policies designed to protect designated assets and should be refused.

1.1.586 Seascape, Landscape and Visual Effects

The applicant’s assessment methodology fails to define a distance threshold beyond which major effects cease, yet their own analysis reveals a consistent pattern: no highly sensitive receptor beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of sensitivity or visibility. This is evident in the applicant’s documentation, which notes that for a coastal area over 30 kilometres away, the scale of change is judged small due to viewing distance, and the Landscape Character synthesis categorises magnitude as High within about 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. Consequently, the protective tests rely on inputs that systematically moderate magnitude at precisely the distances where the most sensitive designated landscapes are situated. This undermines the reliability of the conclusions presented to the Scottish Ministers, as the true effects on these landscapes are likely understated.

While the applicant has made efforts to mitigate visual impact through the use of visualisations consistent with NatureScot’s guidance, it is important to recognise inherent limitations within these materials. NatureScot’s own guidance, which the applicant follows, states that printed visualisations cannot fully replicate the scale experienced by a viewer in the field. Additionally, wireline drawings included within the same panoramic views share the same constraints as the accompanying photographs; they represent technical renderings within the visualisation rather than serving as independent corrections or enhancements. Consequently, reliance on these visual materials alone may lead to an underappreciation of the true extent of

visual effects when experienced on site. It follows that while the visualisations contribute valuable information, their technical and perceptual limitations should be carefully considered in the overall assessment.

The proposed development would introduce aviation and navigation lighting to a sea horizon that is currently devoid of any artificial illumination, thereby permanently altering the character of the night-time seascape throughout its stated 35-year operational lifespan. This change represents a significant departure from the existing conditions, where the absence of lighting contributes to the natural and unspoiled visual quality of the marine environment after dark.

Furthermore, this operational timeframe does not mitigate the policy implications of the harm caused. Granting consent for this development effectively constitutes an acknowledgment that the seascape in question is appropriate for wind farm use, with all the attendant visual impacts that such use entails. Therefore, the decision carries substantial weight in shaping the future character and management of the night-time seascape, beyond the immediate term of the development's operation.

The proposal's failure to adequately address the scale of its impacts on landscape and seascape interests results in non-compliance with key planning policies, thereby undermining the protection afforded to nationally important areas. This practical shortcoming means that the development risks causing unacceptable harm to these valued environments, contrary to the guiding principles set out in national policy frameworks.

Specifically, the effects of the proposal engage multiple provisions, including NPF4 Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively seek to safeguard the integrity and character of significant landscapes and seascapes from adverse development impacts. The applicant has not demonstrated that its assessment of the scale of these effects aligns with the methodology it employed, creating uncertainty and undermining confidence in the conclusions presented.

Given this lack of demonstrated compliance, the proposal cannot be considered to meet the statutory requirements for protecting nationally important landscapes and seascapes. It follows that the application should be refused on the grounds of failing to satisfy relevant planning policies designed to preserve these environmental assets for the benefit of current and future generations.

1.1.587 Cultural Landscape, Archaeology and Historic Environment

The assessment finds that the cultural significance of the affected heritage assets encompasses a range of qualities that extend beyond fixed physical features. According to the applicant's baseline, this significance arises from aspects such as pilgrimage, arrival by sea, movement through a living cultural landscape, the interrelationships between monuments, spirituality, and the surrounding landscape and seascape. These attributes are experienced dynamically, primarily through movement rather than from static viewpoints, highlighting the importance of the broader cultural landscape and experiential qualities in understanding heritage impacts.

However, Historic Environment Scotland's consultation responses, as recorded within the application, indicate that the applicant's assessment may inadequately capture these wider qualities. They requested the inclusion of additional viewpoints to ensure a more comprehensive representation of the cultural landscape and its experiential dimensions. This suggests that the current assessment framework may require augmentation to fully address the heritage impacts within the living cultural context identified.

The heritage impact conclusions presented rely fundamentally on the findings of the landscape assessment. However, when the landscape effects are understated, as previously demonstrated, this understatement directly transfers to and compromises the accuracy of the heritage conclusions that are constructed upon them. In this regard, the mitigation measures proposed cannot be fully trusted to address the true extent of harm, since their basis—the landscape assessment—is itself deficient.

This reliance on an incomplete landscape evaluation weakens the overall credibility of the heritage impact appraisal. If the landscape effects are not accurately assessed and articulated, the subsequent heritage conclusions inevitably fail to reflect the genuine magnitude of impact on heritage assets. Consequently, the robustness of the planning decision-making process is undermined, and the potential for effective mitigation is diminished. This fundamental flaw calls for a reassessment of the landscape evidence before any definitive heritage impact conclusions are accepted.

1.1.588 Effects on Island Communities, Tourism and the Local Economy

The applicant's own baseline assessments acknowledge that the island communities affected by this proposal rely exceptionally heavily on visitors who are drawn specifically by the qualities identified: landscape, seascape, cultural heritage, tranquillity and remoteness. These attributes are not incidental but form the core attraction sustaining the local visitor economy. The proposed development threatens to alter these very qualities, thereby undermining the fundamental reasons why visitors choose to come.

Any diminution of these key characteristics would have a direct and adverse impact on the economic foundations of these communities. This, in turn, would jeopardise the provision of local services, reduce population stability, and ultimately threaten the long-term social and economic viability of the islands. The proposal therefore poses a significant risk to the continued sustainability of these communities by damaging the essential qualities upon which they depend.

The applicant's own consultants acknowledge that habitability represents a potentially significant pathway through which the proposed development could impact island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 is conducted at a regional scale, focusing in detail on port communities but omitting a comparable place-based analysis for the island communities directly facing the development. This assessment nonetheless concludes that these island communities exhibit low sensitivity to tourism effects.

This approach is problematic because small island economies are not accurately represented by regional averages. Such economies are typically concentrated in sectors that are highly vulnerable to changes in the attributes attracting visitors. Furthermore, reliance on increasing visitor numbers does not diminish this sensitivity; rather, it intensifies the dependence on the very qualities that may be compromised by the development. Consequently, the conclusion of low sensitivity, derived without specific place-based analysis, lacks evidential support and amounts to an unsubstantiated assumption. Therefore, the socio-economic assessment methodology employed is insufficient to fully understand or mitigate the impacts on island communities.

The proposal fails to comply with the relevant planning policies and statutory duties concerning island communities. Specifically, it does not satisfy the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions must be grounded in robust socio-economic evidence and adopt a precautionary approach where such evidence is insufficient. Furthermore, the proposal does not meet the standards established by NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, both of which require that the interests of island communities be thoroughly assessed and given appropriate weight through meaningful engagement throughout the decision-making process, from inception to conclusion.

The applicant has acknowledged that island communities warrant particular scrutiny; however, the necessary assessments to understand the potential impacts on these communities have not been undertaken. As a result, there is no demonstrated compatibility between the proposal and the sustainability of island communities. Crucially, the statutory duties owed to these communities have not been fulfilled. In light of this, the proposal does not meet the required planning and statutory standards for assessing and protecting island communities, and permission should therefore be refused.

1.1.589 Ecology, Biodiversity and Habitats Regulations

There is uncertainty regarding the full extent of ecological impacts arising from the proposed development, given its location within an area containing Priority Marine Features and Annex I habitats. These sensitive environmental assets lie directly within the development zone, while the adjacent waters provide habitat for various protected species, including seabirds, marine mammals and basking sharks. The scale of construction, operational activities and eventual decommissioning envisaged would occur over several decades, raising concerns about potentially significant adverse effects on this ecologically important marine environment. Consequently, it is imperative that these considerations are thoroughly addressed before the proposal proceeds.

The applicant’s submission of a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan signals recognition of potential adverse impacts on the North Colonsay and Western Cliffs Special Protection Area, specifically concerning the guillemot population. Such documents are customarily prepared in circumstances where the integrity of a protected site cannot be confidently assured, indicating that the applicant does not rule out the possibility of

an adverse effect. Moreover, the inclusion of these plans acknowledges that Scottish Ministers may reach a different conclusion regarding impacts on site integrity than the applicant. This submission is therefore a critical element of the application, intended to address potential adverse effects through derogation provisions and compensation measures, albeit without definitive assurance that such impacts can be fully avoided.

The legal framework governing developments affecting protected habitats demands that consent may only be granted when it is conclusively demonstrated that the proposal will not adversely affect the integrity of the protected site, except where the strict derogation tests set out in the Habitats Regulations are satisfied. This requirement involves a high evidential standard whereby no reasonable scientific doubt can remain regarding the absence of harm. The responsibility to provide such evidence lies squarely with the applicant. Importantly, proposals for mitigation, compensation, or future monitoring alone cannot establish compliance with these statutory tests. This stringent approach is reflected not only in the Habitats Regulations themselves but is also embedded within GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. In conclusion, any planning decision must rigorously uphold these legal and policy requirements to ensure the protection of designated habitats, and where the necessary evidential threshold is not unequivocally met, consent should be refused.

1.1.590 Cumulative and In-Combination Effects

The current assessment approach is fundamentally flawed because it fragments the project by deferring critical elements, thereby preventing a comprehensive evaluation of its overall impacts. Only part of the project—the wind farm itself—is before the Scottish Ministers, while essential components such as the export cable corridor and onshore transmission works, without which the wind farm cannot operate, are reserved for later applications. This segmentation means that the effects of the entire project are never assessed collectively. Consequently, important elements are left to be considered through subsequent consenting processes after the principal decision has been made. Such an approach contravenes the legal principle established in Raeshaw Farms, which requires that a project be assessed as a whole rather than being "salami-sliced" into parts whose individual effects may appear smaller. This fragmented assessment undermines the integrity of the planning process and the ability to fully understand and mitigate the project's cumulative impacts.

The cumulative impact assessment relies fundamentally on the findings established in the broader Environmental Impact Assessment, as detailed in the applicant’s evidence. This means that the baseline conditions for landscape, heritage, and socio-economic factors form the foundation upon which cumulative effects are evaluated. However, if these initial assessments understate the true extent of impacts, the cumulative assessment inherently inherits this deficiency.

Because the baseline is reduced, the assessment of combined effects from the proposed development alongside other existing, consented, and foreseeable projects is consequently understated. This approach risks overlooking the full magnitude of the cumulative impacts that may arise, thereby compromising the

reliability of the overall environmental appraisal. It is essential that the baseline accurately reflects current conditions to ensure that the cumulative effects are neither underestimated nor misrepresented.

In light of this, the cumulative impact assessment as presented cannot be regarded as a fully robust or dependable evaluation of the combined effects. Without addressing the foundational understatements in the baseline assessments, there remains significant uncertainty regarding the true scale of cumulative impacts, which warrants further scrutiny before the proposal can be confidently supported.

The applicant has failed to demonstrate that the cumulative and in-combination effects of the proposal, including the full scope of the project, have been reliably identified and assessed. This shortcoming is particularly significant given the potential for deferred works to contribute additional environmental impacts that remain unquantified and unconsidered. Such omission undermines the integrity of the environmental impact assessment and obscures the true scale of potential harm.

This failure constitutes non-compliance with established planning policies and regulatory frameworks, specifically engaging GEN 21 and paragraph 4.85 of the National Marine Plan, as well as NPF4 Policy 11(e). Furthermore, it contravenes the requirements of the Environmental Impact Assessment Regulations concerning project splitting, which mandate a comprehensive and integrated assessment of all components of a development to prevent piecemeal consideration that might understate cumulative effects.

In light of these concerns, it is imperative that the decision-making process explicitly addresses the treatment of deferred works to ensure a complete and transparent evaluation. Without this, there remains a material risk that significant environmental effects will be overlooked, justifying refusal of consent until such deficiencies are rectified.

1.1.591 Public Engagement, Site Selection and Environmental Information

While the applicant requests that Scottish Ministers place significant weight on the site-selection process, it is essential to consider the shortcomings in public participation that undermine its legitimacy. The consultation period coincided with the busiest months for island communities, when residents are occupied with continuous work throughout the visitor season and access to specialist advice is limited. This timing contrasts sharply with the applicant’s extended preparation period, which has benefited from substantial professional and financial resources. Consequently, the affected communities have not been afforded a comparable opportunity to engage meaningfully with the extensive technical material submitted, which runs to many thousands of pages.

The principles enshrined in GEN 18 of the National Marine Plan, alongside those of the Aarhus Convention, explicitly require that affected parties have a realistic chance to participate in decisions of this significance. The conditions under which communities have been expected to respond clearly fall short of this standard. It is therefore imperative that Ministers take these deficiencies in public participation seriously when considering the representations made, recognising that the

consultation process as conducted does not meet the required standards of effective engagement.

The Environmental Impact Assessment submitted in support of this application falls short in providing a sufficiently robust evidential foundation for the Scottish Ministers to make an informed decision. While the assessment identifies numerous pathways to potentially significant environmental effects, it fails to investigate these comprehensively. Specifically, the landscape assessment relies on conclusions that follow a distance-based pattern not supported by its own stated methodology. Similarly, the heritage assessment does not adequately apply its integrity test, and the socio-economic assessment lacks any place-based analysis of the affected island communities. These deficiencies collectively undermine the reliability of the environmental information presented.

Moreover, the application frequently defers crucial analysis to future stages, including post-consent plans, monitoring programmes, and additional approvals. Such reliance conflicts with the requirements of the EIA Regulations, which mandate that likely significant effects must be fully understood prior to determination. Deferring key assessments to later stages cannot substitute for the thorough, upfront evaluation necessary to ensure that environmental impacts are properly considered before consent is granted. This approach leaves critical uncertainties unresolved at the point of decision-making.

It is therefore essential that the Scottish Ministers base their determination solely on the evidence currently before them, without assuming that outstanding matters will be satisfactorily addressed later. The applicant has not demonstrated that the environmental information submitted is adequate for this purpose. Consequently, the application should not be approved in its present form, as the insufficiency of the Environmental Impact Assessment precludes a fully informed and lawful decision.

1.1.592 Effects on Local Area

The proposed development encompasses a 448 square kilometre area immediately north-west of Islay and west of Colonsay, positioning these islands as the closest communities directly affected. However, the application’s assessment inadequately recognises Islay’s role as an impacted island community, instead predominantly considering it as a potential project location. This approach fails to provide any place-based evaluation of the effects on Islay’s Atlantic-facing communities, whose proximity to the development area inevitably influences their setting, local economy, and community life.

Similarly, Colonsay and Oronsay face the array directly, with their daily life intimately connected to the seaward outlook. Notably, the North Colonsay and Western Cliffs Special Protection Area, located on Colonsay’s coastline, is central to the applicant’s derogation case and compensation plan, implicitly acknowledging that harm to the internationally protected seabird population cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance within this community, suffers from the same deficiencies in the heritage assessment, particularly regarding the treatment of its open maritime setting. Consequently, the

application’s evaluation of environmental and heritage impacts on these islands is insufficiently robust and reliable.

The applicant’s Coastal Character assessment recognises the Sound of Iona as an area of high sensitivity, noting its direct orientation towards the development site and extensive visibility. The assessment identifies a large geographical extent of change, approximately 21 kilometres, with turbines spanning around 39 degrees of the horizon, resulting in a moderate and significant overall effect. Similarly, the West Coast of Iona is acknowledged as highly sensitive with widespread visibility, and significant effects are accepted for residents and visitors across much of the island, including at Dùn Ì, Iona’s highest point.

However, the evaluation of heritage impacts appears to underestimate the significance of Iona’s monastic landscape, which includes internationally important sites such as the Abbey, the Nunnery, and the high crosses. The applicant’s baseline recognises the importance of pilgrimage, arrival by sea, and movement through the landscape in understanding this heritage. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet the applicant did not provide visualisations from critical vantage points such as the raised ground above St Columba’s Bay at Càrn Cùl ri Èirinn, potentially overlooking key experiential impacts.

Community concerns further underline the scale of the effects, with a household consultation revealing that 92 per cent of respondents on Iona object to the proposal. Notably, habitability—a pathway of potential effect identified by the applicant’s own consultants—has not been assessed. The perceived scale of the turbines can be contextualised by comparison with Ben Hynish on Tiree, a landmark 141 metres high visible from Iona at approximately 33 kilometres; the largest turbines would exceed this height by approximately 194 metres at a closer distance of roughly two-thirds of that range. Taken together, these points suggest that the visual, community, and heritage impacts on Iona may be both more extensive and more significant than the applicant’s assessment indicates.

The applicant’s assessment recognises significant effects on several key areas of Mull and the Ross of Mull, notably the Ross of Mull South coastal area, which is identified as having High sensitivity at distances of approximately 22 to 24 kilometres, with a Medium magnitude of impact attributed. The assessment acknowledges significant effects at Erraid and on the Core Paths of the Ross, as well as at Fionnphort, the community serving as the gateway to Iona and the primary point of embarkation for visitors. This community is explicitly noted as being most directly linked to the flow of visitors, whose experience the applicant concedes would be significantly affected. Similarly, across Mull, significant effects are accepted on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, encompassing Mull’s western waters and islands, is assessed as having High sensitivity throughout, at viewing distances between approximately 21 and 33 kilometres, yet only a Medium magnitude of impact is attributed. This suggests an underestimation of potential visual and experiential effects in sensitive, designated landscapes.

A further concern arises from the applicant's treatment of the Wilderness and Gribun Rocks coastal area, where the assessment relies heavily on distance-based reasoning, concluding that due to viewing distances exceeding 30 kilometres, the scale of change is small. Such reasoning fails to fully account for the qualitative importance of these landscapes and their coastal character to the local communities and tourism economy. Mull's west-facing tourism sector, including wildlife boat operators and accommodation providers in its western townships, depends fundamentally on the integrity of the Atlantic seascape, which the proposed development would industrialise. Notably, no place-based assessment has been undertaken for these communities, leaving a significant gap in understanding the cumulative visual, economic, and community impacts. This omission undermines the robustness of the applicant's conclusions and suggests the need for a more comprehensive and locally attuned evaluation of effects on Mull and the Ross of Mull coastal communities and landscapes.

The applicant's assessment underestimates the practical consequences for important designated landscapes and vulnerable island communities, notably by omitting any consideration of Ulva. This island, situated within the Loch na Keal National Scenic Area, is a small, community-owned settlement at the outset of regeneration. Its recovery is closely tied to the preservation of its natural setting and unspoilt seascape, yet the applicant has made no assessment of effects on Ulva's unique qualities, thereby overlooking critical factors that support the community's viability and cultural identity.

Similarly, the treatment of other designated landscapes appears insufficiently rigorous. Staffa, another island within the Loch na Keal National Scenic Area and renowned across Europe, lies approximately 35 kilometres from the development area—beyond the 30 kilometre limit suggested by NatureScot for assessing effects on National Scenic Area qualities. Despite the applicant's recognition of the panoramic maritime qualities of Staffa, it concludes that the scale of change would be small and the effect not significant. The Jura National Scenic Area, assessed at about 28 to 32 kilometres distance and of high sensitivity, is attributed only a medium to low magnitude of effect, justified by distance and retained landforms, even though its designation fundamentally depends on its wild, undeveloped Atlantic character. The Scarba, Lunga and the Garvellachs National Scenic Area, located some 35 to 40 kilometres away, receives comparable treatment. Collectively, these assessments appear to downplay the potential impacts on the natural and cultural qualities that underpin these designated landscapes and island communities.

The applicant's assessment designates the South Tiree coastal area as having High sensitivity at a distance of approximately 35 kilometres, yet concludes a Low magnitude of change from the proposed development. This evaluation appears inconsistent when considering Tiree's distinctive physical and visual characteristics. The island is exceptionally low-lying, with its highest elevation, Ben Hynish, reaching only 141 metres. Its landscape character is fundamentally defined by the dominance of sea and sky, presenting an open oceanic horizon that is integral to its sense of place. Introducing turbines up to 335 metres high would create vertical elements entirely unprecedented in the existing seascape. Given the prominence and scale of such structures against Tiree's flat and exposed environment, the Low magnitude classification significantly understates the potential visual and experiential impacts.

This underestimation calls into question the reliability of the applicant's overall evaluation of effects on this sensitive and distinctive landscape.

While the applicant's assessment includes certain distance-based mitigation measures intended to moderate visual and economic effects, these have not been adequately applied to all relevant receptors. For example, communities such as Gigha, a community-owned island emblematic of island regeneration, face the development waters directly from the east. Despite the island's finely balanced community and economy, the potential impacts have not been examined, leaving a significant gap in the assessment's comprehensiveness.

Similarly, Ardnamurchan Point, the westernmost point of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas represent sensitive receptors to which the distance-based moderation referenced in the objection should logically apply. However, the applicant's assessment does not appear to have fully considered the implications for this key visitor destination and its associated economic value.

Furthermore, the west coast of Kintyre encompasses a series of communities whose outlook, character, and visitor economies are intrinsically linked to the open Atlantic seaboard, including views toward Islay, Jura, and the surrounding waters. The Treshnish Isles, alongside other small islands and mainland coasts with direct views of the development area, share this position of potential sensitivity. The omission of these communities from a thorough effects evaluation undermines the assessment's ability to capture all significant impacts on mainland and island communities reliant on the seascape, thus compromising the overall robustness of the environmental appraisal.

There remains significant uncertainty regarding the applicant's approach to assessing impacts beyond 20 kilometres, which systematically moderates the magnitude of change and discounts effects on highly sensitive receptors at these distances. Taken together, the evidence demonstrates that where sensitive communities exist beyond this threshold, their experiences and the true extent of environmental effects have not been adequately evaluated through any place-based assessment. This methodological limitation fundamentally undermines the integrity and completeness of the environmental impact assessment, leaving a critical gap in understanding the full implications of the proposal.

1.1.593 Further Comments

My family and I live in Texas but our ancestors are from Jura and we deeply enjoy visiting the Hebrides. The proposed action would make a significant visual and environmental impact on locations that are pristine or nearly pristine. We have often enjoyed the dark skies and open seas of the Hebridean area, especially during pilgrimages to Iona.
Coming from Texas, we know what it's like to look out a window and see hundreds of windmills across the landscape. The visual impact of these windmills in the Hebrides, much like the visual impact of the windmills in Texas, will pale in comparison to the significant and long term involvement of heavy machinery, the environmental impact to both airborne and marine life, and the permanent disruption of a wild and stunning

landscape. Like the windmills in the Texas Panhandle, the only entity that actually benefits from the construction and use of windmills like these is the entity that operates them, everyone else simply has to endure them and ultimately live with the long term and often unknown effects when those windmills fall into disrepair.

1.1.594 Summary

The proposal for the MachairWind Offshore Wind Farm fails to meet the requisite statutory and policy standards governing its determination. The applicant's own evaluation acknowledges substantial impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal region. Independent analysis of the submitted documents reveals that these impacts have been consistently underestimated. Notably, a comprehensive heritage assessment, mandated by policy, has not been conducted. Additionally, while the potential effects on the island communities have been identified, no formal assessment of these impacts has been undertaken. The applicant has also not demonstrated compliance with the necessary ecological criteria. Furthermore, the application before the Scottish Ministers is incomplete, as it only addresses a portion of the overall project.

Given these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to deny the associated marine licence. Should the Ministers be inclined not to refuse the application outright, I request that they require the submission of further environmental information alongside enhanced visualisations. I also propose that the applications be adjudicated only following a public inquiry, enabling a thorough examination of the issues raised in this objection. Regardless of the final determination, I ask that the Ministers explicitly articulate their conclusions on the impacts to cultural heritage and the island communities in their decision statement.

Yours faithfully,

[Redacted]

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

Member of the public 563
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, associated with application 00012385 for consent under section 36 of the Electricity Act 1989 and application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications have been lodged by MachairWind Limited, trading as ScottishPower Renewables. I request that my objection be officially recorded and that I am informed of the outcome of the determination process.

The proposal concerns the establishment of an offshore wind farm with an anticipated capacity of approximately 2 gigawatts. The development envisages between 91 and 144 wind turbines, each with a maximum height of 335 metres to blade tip, situated within a designated Windfarm Development Area spanning roughly 448 square kilometres. This site lies to the north-west of Islay and to the west of Colonsay, at an estimated distance of 21 kilometres from Iona, and is in close proximity to the islands and coastal settlements of the southern Hebrides.

The following sections articulate the planning and environmental grounds underpinning this objection, structured around the statutory and policy frameworks governing the assessment of these applications. It is incumbent upon the applicant to furnish robust evidence demonstrating compliance with all relevant statutory tests. The onus does not rest upon objectors to disprove these claims. Having considered the submissions, it is clear that the applicant has failed to meet this evidential burden. Accordingly, the applications should be refused consent.

1.1.595 Seascape, Landscape and Visual Effects

The applicant’s evidence acknowledges that the proposed development will introduce aviation and navigation lighting to a sea horizon that is currently unlit, thereby permanently altering the character of the night-time seascape throughout its operational life of 35 years. This change represents a significant visual impact, as the existing natural darkness will be replaced by artificial illumination, fundamentally transforming the nocturnal environment of the seascape.

Furthermore, the temporal limitation of 35 years does not diminish the policy implications of such harm. Consent for this development effectively constitutes a determination that the seascape is appropriate for wind farm use, thereby establishing a precedent for the acceptability of such character alterations within this marine setting. This has enduring consequences for the protection of seascape character and must be carefully weighed in the decision-making process.

1.1.596 Effects on Island Communities, Tourism and the Local Economy

The practical consequence of the proposed development is a direct threat to the fundamental economic and social sustainability of the island communities affected. These communities rely exceptionally heavily on visitors, whose presence underpins local businesses, services, and population stability. Any alteration to the qualities

that draw visitors risks undermining the economic base upon which these islands depend.

The applicant's own baseline assessments identify the key attractions for visitors as the landscape, seascape, cultural heritage, tranquillity, and remoteness of the area. These elements are not peripheral; they constitute the very essence of what makes the islands appealing and viable as destinations. Diminishing or damaging these characteristics would inevitably lead to a decline in visitor numbers, with cascading effects on employment, local services, and community cohesion.

In summary, the proposal poses a significant risk to the viability of these island communities by threatening the qualities that sustain their visitor economy. Given the exceptional dependence of these islands on tourism drawn by these unique attributes, the development should be reconsidered to avoid jeopardising the long-term social and economic health of these communities.

1.1.597 Ecology, Biodiversity and Habitats Regulations

The development site encompasses Priority Marine Features and Annex I habitats, indicating its high ecological value. Additionally, the surrounding waters are known to support significant populations of seabirds, marine mammals, and basking sharks. This rich biodiversity underscores the environmental sensitivity of the area and the need for careful consideration of any activities proposed within it.

The proposed development entails large-scale construction, operation, and eventual decommissioning over a period spanning several decades. Such prolonged and extensive intervention presents a substantial risk of adverse environmental effects on the designated marine features and protected species. Given the ecological importance of the site and its surroundings, the potential for significant negative impacts must be thoroughly assessed and addressed to ensure adequate protection of these vulnerable marine ecosystems.

1.1.598 Public Engagement, Site Selection and Environmental Information

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

Consequently, the Scottish Ministers are compelled to base their decision solely on the evidence presented at the time of determination, without reliance on assumptions that outstanding matters will be satisfactorily addressed later. The applicant has not

demonstrated that the environmental information submitted meets the adequacy standard necessary for informed decision-making. This insufficiency undermines the integrity of the assessment and precludes the Ministers from confidently concluding that the environmental implications of the proposal have been properly identified and addressed.

1.1.599 Effects on Local Area

The applicant's environmental and heritage impact assessment notably lacks adequate consideration of the direct effects on Islay and Colonsay communities, despite their proximity to the proposed development area. While mitigation measures focus on specific project locations, there is an absence of place-based evaluation addressing how Islay's Atlantic-facing settlements, situated adjacent to the nearest edge of the 448 square kilometre development zone, will experience changes to their setting, local economy, or community life. This omission undermines the reliability of the assessment by failing to account for the social and economic implications on these island populations.

Furthermore, for Colonsay and Oronsay, the daily seaward outlook, integral to their identity, faces the development directly. The North Colonsay and Western Cliffs Special Protection Area, located on Colonsay's coastline, is central to the applicant's derogation case and compensation proposals, implicitly acknowledging that harm to the internationally protected seabird populations cannot be ruled out. Additionally, Oronsay Priory, a scheduled monument of national significance within this community, is inadequately assessed, particularly regarding the impact on its open maritime setting. These shortcomings collectively demonstrate that the effects on the heritage and natural environment of these islands have been underassessed, thereby calling into question the overall conclusions presented in the application.

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

Moreover, the applicant's evaluation neglects critical cultural and social dimensions that exacerbate the impact on Iona's community and heritage. Iona's monastic landscape, encompassing internationally significant sites such as the Abbey, the Nunnery, and the high crosses, derives its value from pilgrimage, arrival by sea, and movement through the landscape—elements central to its heritage significance as

identified in the baseline study. Despite Historic Environment Scotland's request for additional viewpoints, including from the ferry crossing, the applicant did not provide visualisations from key vantage points such as the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn. Community consultation further reveals profound opposition, with 92 per cent of households objecting to the proposal, yet the applicant's own consultants admit that habitability, a critical pathway of potential effect, was never assessed. Taken together, these omissions and underestimations compromise the accuracy and robustness of the environmental and social impact evaluation, warranting a more thorough and sensitive appraisal before any determination is made.

The applicant's assessment leads to practical consequences that risk undervaluing the true extent of impacts on the Ross of Mull South coastal area and its communities. Although significant effects are acknowledged at Erraid and along the Core Paths of the Ross, as well as at Fionnphort—the critical gateway to Iona and primary embarkation point for visitors—the assessment assigns only a Medium magnitude to these changes despite recognising the high sensitivity of the area at distances of 22 to 24 kilometres. This approach fails to adequately reflect the importance of Fionnphort, whose community is intimately linked to the flow of visitors, and which would therefore experience material socio-economic and experiential effects.

Across Mull more broadly, the applicant concedes significant effects on Core Paths and within the Central, South and West Mull Local Landscape Area, as well as on the Loch na Keal National Scenic Area, which is of High sensitivity throughout a zone extending 21 to 33 kilometres. Yet, no higher than a Medium magnitude is attributed to these impacts. Moreover, the applicant's reliance on distance-based criteria, exemplified by the dismissal of effects around the Wilderness and Gribun Rocks coastal area due to viewing distances exceeding 30 kilometres, inadequately captures the scale of change. This is particularly concerning given that Mull's west-facing tourism economy—including wildlife boat operations and accommodation services—depends heavily on the integrity of the Atlantic seascape, which the proposed development would industrialise. Notably, no place-based assessments have been conducted for these western communities, leaving a significant gap in understanding the full extent of potential economic and landscape consequences.

The applicant's assessment acknowledges potential effects on designated landscapes within the Loch na Keal National Scenic Area, including Ulva, Staffa, Jura, and the Scarba, Lunga and the Garvellachs National Scenic Area, yet its conclusions understate the significance of these impacts. Ulva, a community-owned island at the outset of regeneration, shares fully in the effects on the National Scenic Area; its small, re-establishing community depends fundamentally on the unspoilt seascape and setting that the development threatens, yet no specific assessment has been undertaken for Ulva's unique circumstances. Staffa, situated approximately 35 kilometres from the development, lies beyond the 30-kilometre threshold recommended by NatureScot for assessing National Scenic Area qualities; notwithstanding the applicant's acceptance of the island's panoramic maritime qualities, it concludes that effects there would be small and not significant. Similarly, the Jura National Scenic Area, assessed at a distance of about 28 to 32 kilometres and of high sensitivity, is attributed only medium to low magnitude effects due to

perceived mitigation by distance and retained landforms, despite its designation being founded on the wild and undeveloped character of its Atlantic outlook. The Scarba, Lunga and the Garvellachs National Scenic Area, located 35 to 40 kilometres away, is treated in the same manner. This approach collectively underestimates or omits significant effects on these important designated landscapes and fails to recognise the vulnerability of island communities such as Ulva, thereby undermining the protection of their natural and cultural qualities.

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

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

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

The applicant's assessment notably omits consideration of significant effects on several mainland and island communities that have direct visual and economic connections to the seascape in question. For example, Gigha, a community-owned island whose purchase by its residents has become a national emblem of island regeneration, faces the development waters from the east. Despite the island's finely balanced community and economy, the potential impacts on Gigha have not been examined within the applicant's evaluation. Similarly, Ardnamurchan Point, the most westerly point of the British mainland, commands expansive panoramic views along the Hebridean seaboard. These views attract visitors along the peninsula and represent receptors of seaward panoramas of exceptional quality. Yet, the applicant applies a distance-based moderation to such receptors that effectively diminishes the significance of their experience, contrary to their acknowledged value.

Further, the west coast of Kintyre comprises a chain of communities whose identity, outlook, and visitor economy are intrinsically shaped by the open Atlantic seaboard facing Islay, Jura, and adjacent waters. The Treshnish Isles, along with other small islands and mainland coasts that share views toward the development area, occupy

a similar position in terms of their relationship with the seascape. The applicant's assessment fails to address the potential effects on these areas, which collectively represent an interconnected network of receptors with cultural, visual, and economic reliance on the seascape. This omission compromises the comprehensiveness of the environmental appraisal and undermines confidence in the thoroughness of the assessment process. It is therefore essential that the effects on these mainland and island communities be fully considered to provide an accurate and complete understanding of the development's implications.

The practical consequence of the applicant's distance-based approach to environmental impact assessment is a systematic underestimation and discounting of significant effects on sensitive receptors located beyond approximately 20 kilometres. This methodology results in a moderated magnitude of change assigned to these receptors, despite their acknowledged sensitivity. Critically, the communities residing in these areas have not been afforded any place-specific assessment of the impacts they are likely to experience. Taken together, these factors demonstrate a consistent pattern within the applicant's assessment whereby effects on distant yet highly sensitive receptors are diminished in importance solely due to their distance from the site. Such an approach undermines the integrity and comprehensiveness of the environmental impact assessment by failing to fully recognise and evaluate the true extent of potential effects on these communities. Consequently, the assessment does not provide a robust or reliable basis for decision-making regarding the wider environmental and social consequences of the proposed development.

1.1.600 Summary

This proposal fails to satisfy the statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges significant adverse impacts on nationally designated landscapes, as well as on the heritage and communities along this coastline. However, published analyses of the applicant's documentation reveal that these effects have been understated. Notably, the necessary heritage assessment has not been conducted. Furthermore, while the effects on the island communities affected by the development were identified, no assessment of these impacts has been undertaken. The ecological tests required to meet statutory obligations have not been demonstrated as achievable. Compounding these issues, only a portion of the project is currently submitted for consideration by the Scottish Ministers.

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

Should the Ministers decide against refusal, it is requested that they require the submission of further environmental information alongside enhanced visualisations. The applications should then be determined only following a public inquiry, providing a forum where the concerns raised in this objection can be thoroughly scrutinised. Moreover, it is sought that, irrespective of the outcome, the Ministers explicitly address and include in their decision the effects on cultural heritage and the impacted island communities.

Yours faithfully,

[Redacted]

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

Member of the public 564
Dear Sir/Madam,

This letter serves as a formal objection to the MachairWind Offshore Wind Farm proposals, submitted under application numbers 00012385 for consent pursuant to section 36 of the Electricity Act 1989, and 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010, both lodged by MachairWind Limited, a subsidiary of ScottishPower Renewables. I request to be officially recorded as an objector and to receive notification of the final decisions regarding these applications.

The development in question involves the construction of an offshore wind farm with an installed capacity of approximately 2 gigawatts. The scheme encompasses between 91 and 144 turbines, each with a maximum blade tip height of up to 335 metres. The proposed site spans a Windfarm Development Area of roughly 448 square kilometres, situated in the marine environment north-west of Islay and west of Colonsay. This location lies approximately 21 kilometres from Iona and is in close proximity to the islands and coastal communities of the southern Hebrides.

My objections are grounded in planning and environmental considerations, assessed against the relevant statutory and policy frameworks governing these applications. It is important to note that the onus lies solely with the applicant to provide comprehensive and compelling evidence demonstrating that all applicable tests and criteria have been met. Objectors are not required to disprove the proposal. Upon review, the applicant has failed to fulfil this evidential burden adequately. Consequently, the applications should be refused consent.

1.1.601 Legislative and Policy Framework

The application fails to demonstrate adequate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989. This Schedule explicitly requires the applicant to have regard to the desirability of preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, as well as protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant must take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The evidence before the determining authority does not establish that these requirements have been satisfactorily addressed.

In addition, the Scottish Ministers, in their determination of the application, are mandated to have regard to the same statutory duties. The application contains deficiencies and omissions in demonstrating such compliance, resulting in conflicts with the applicable legal and policy framework. Where such compliance has not been demonstrated, these shortcomings weigh decisively against the granting of consent. Accordingly, the application should be refused on the basis that it does not meet the statutory obligations under Schedule 9 of the Electricity Act 1989.

The marine licence application fails to demonstrate compliance with the statutory requirements set out in Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland’s National Marine Plan. Key General Policies including GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7

and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts) have not been adequately addressed within the application. This statutory framework requires that authorisation decisions must be taken in accordance with the National Marine Plan unless relevant considerations indicate otherwise, and the absence of demonstrated compliance with these policies is a fundamental procedural and substantive deficiency.

Furthermore, the evidence identifies clear omissions and conflicts with the applicable legal and policy framework, undermining the robustness and soundness of the application. Where compliance has not been demonstrated, such deficiencies weigh decisively against the granting of consent. The failure to provide sufficient evidence or to address the cumulative impacts, historic environment considerations, and natural heritage protections as mandated by the National Marine Plan policies renders the application incomplete and non-compliant. Consequently, the marine licence application should be refused on the grounds that it does not meet the statutory and policy requirements essential for lawful determination.

The proposal fails to comply with key policies of National Planning Framework 4 (NPF4), which is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. Specifically, the application does not demonstrate compliance with Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy), all of which are directly engaged by this proposal.

Policy 3 requires that developments protect and enhance biodiversity, yet the evidence submitted does not adequately demonstrate how this proposal will achieve such outcomes. Similarly, under Policy 4, the proposal must safeguard natural places, but the application lacks sufficient detail or measures to ensure the protection of these environments. Policy 7 mandates the conservation and enhancement of historic assets and places; however, the proposal fails to provide convincing evidence that these heritage considerations have been properly addressed or that any adverse impacts will be avoided or mitigated. Finally, Policy 11 on Energy requires that developments contribute positively to energy objectives, but the application does not satisfactorily show compliance with these requirements.

Where compliance with these policies has not been demonstrated, or where the evidence identifies deficiencies, omissions, or conflicts with the applicable legal and policy framework, these matters weigh decisively against the granting of consent. Given the absence of demonstrated conformity with these critical NPF4 policies, the proposal should be refused planning permission.

The proposal fails to comply with the statutory requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which mandate that the likely significant environmental effects of a development must be identified, assessed, and reported prior to any determination. The submitted documentation does not adequately demonstrate that these requirements have been met, resulting in an incomplete environmental impact assessment. This procedural deficiency undermines the

decision-making process by leaving the determining authority without a full understanding of the potential environmental consequences of the proposal, contrary to the legal framework established to ensure informed and responsible planning decisions.

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

The proposal fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be properly considered and given due weight in the decision-making process. This statutory obligation is clear and unambiguous, yet the submitted documentation does not provide evidence that these interests have been adequately assessed or integrated into the planning evaluation. The absence of such consideration represents a significant procedural deficiency.

Furthermore, the evidence identifies omissions in addressing the specific needs and circumstances of island communities as required by the Act. There is no indication that the proposal has undertaken a thorough analysis of potential impacts on these communities or that any measures have been proposed to mitigate adverse effects. This lack of engagement with the statutory framework results in a conflict with the applicable legal and policy requirements, undermining the legitimacy of the decision-making process.

Given these deficiencies and the failure to demonstrate compliance with the Islands (Scotland) Act 2018, the proposal does not meet the necessary legal standards. As established, where compliance has not been demonstrated or where evidence reveals conflicts with the legal framework, these matters weigh decisively against the granting of consent. Accordingly, the proposal should be refused on the basis that it inadequately considers and weighs the interests of island communities as required by law.

The applicant has failed to provide robust, objective, and proportionate evidence to demonstrate compliance with every relevant statutory duty, planning policy, and environmental assessment requirement. This failure represents a fundamental shortcoming in the application, as the evidential burden rests squarely with the applicant to prove that all legal and policy frameworks have been satisfied. The absence of such demonstration, coupled with identified deficiencies and omissions in the submitted evidence, directly conflicts with the applicable legal and policy framework. In accordance with established principles, these unresolved matters must weigh decisively against the granting of consent. Therefore, on the basis that the applicant has not fulfilled the necessary evidential responsibility to prove compliance, the application should be refused.

1.1.602 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to comply with the impact criteria established in NPF4 Policy 11, thereby undermining the policy's conditional support for renewable energy development. Although Policy 11 endorses renewable energy initiatives, this support is explicitly contingent upon adherence to impact criteria, including those concerning effects on communities (Policy 11(c)) and on landscape, seascape, and other receptors (Policies 11(d) and 11(e)). The evidence clearly demonstrates that the proposal conflicts with these criteria, resulting in significant adverse effects that cannot be reconciled within the policy framework.

Specifically, the proposal would cause considerable harm to nationally designated landscapes and seascapes, while failing to prove that the cultural significance of scheduled monuments and their settings would be preserved. Furthermore, it does not satisfactorily demonstrate how island communities would be protected or how the ecological requirements set out by the policy would be met. These shortcomings confirm that the proposal is not aligned with the essential safeguards embedded in NPF4 Policy 11 and, as such, should not be supported.

The proposal would result in significant adverse effects on nationally designated landscapes and seascapes, undermining their protected qualities. This outcome directly conflicts with Policy 11 and related provisions within the National Planning Framework 4, which collectively seek to preserve the character and value of National Scenic Areas and other nationally important landscapes. The failure to safeguard these designated assets would erode the very reasons for their recognition and protection under the Framework.

Furthermore, the proposal does not demonstrate adequate protection for the cultural significance of scheduled monuments or their settings, as required by Policy 7 and its subsections. The absence of evidence that these heritage assets would be preserved raises serious concerns regarding the impact on the historic environment. In addition, there is no satisfactory assurance that island communities, which often possess distinct cultural and environmental characteristics, would be effectively safeguarded, contrary to the expectations set out in the Framework.

Lastly, the ecological assessments submitted fail to show compliance with the necessary biodiversity tests outlined in Policy 3. Without clear evidence that these ecological standards can be met, the proposal cannot be deemed consistent with NPF4's commitment to biodiversity conservation. Taken together, these shortcomings establish that the proposal is incompatible with multiple policies designed to protect designated assets of national importance.

When considering the mitigation measures proposed, it is evident that they fall short in addressing the fundamental conflicts with the terrestrial development plan framework, particularly the Argyll and Bute Local Development Plan 2. This plan explicitly seeks to protect landscape, heritage, and community interests from adverse effects arising from development. The proposal, however, would result in detrimental impacts on these protected interests, indicating a clear inconsistency with the policies set out in the development plan. Despite the applicant's efforts, no

convincing evidence has been presented to demonstrate that the proposal's effects can be sufficiently mitigated to align with these policy objectives.

Furthermore, this inconsistency with the Local Development Plan extends to a broader conflict with the National Planning Framework 4 when considered in its entirety. The applicant has not provided adequate justification or evidence to overcome this fundamental policy discordance. As a result, the proposal cannot be regarded as compliant with the relevant terrestrial development plan framework, reinforcing the position that it should not be supported in its current form.

1.1.603 Seascape, Landscape and Visual Effects

The assessment methodology employed by the applicant exhibits a significant limitation in its treatment of distance thresholds, which undermines the reliability of the predicted effects. Notably, the applicant's written methodology in Appendix 16.1 does not specify any distance beyond which major effects are considered to cease. Nevertheless, a published Evidence Note, which draws exclusively on the applicant's Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern across all three assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of the receptor's sensitivity or the extent of visibility.

Further examination of the applicant's own documents confirms the critical role distance plays in shaping these judgements. For instance, the assessment of a coastal area situated over 30 kilometres from the site concludes that, owing to the viewing distance, the scale of change is small. Additionally, the Landscape Character synthesis categorises magnitude as High within roughly 20 kilometres, Medium between approximately 20 and 30 kilometres, and Low beyond about 30 kilometres for certain landscape types. This systematic moderation of magnitude at distances coinciding with the location of the most sensitive designated landscapes results in protective tests being applied to understated inputs. Consequently, the conclusions presented fail to provide a reliable description of the effects that the Scottish Ministers are being asked to consider for consent.

The applicant relies on NatureScot's visualisation guidance, which explicitly recognises inherent limitations in printed visualisations. These materials cannot fully convey the true scale experienced by a viewer on site. Furthermore, wireline drawings included within the same panoramic views share these constraints, as they remain technical renderings tied to the photographic basis and do not serve as independent corrections to visual perception. This acknowledgement underscores the need for cautious interpretation of visual evidence in assessing the proposed development's visual impact.

While mitigation measures may reduce some visual impacts during daylight hours, they cannot address the fundamental change introduced by aviation and navigation lighting at night. The development would introduce such lighting to a sea horizon that is currently unlit, resulting in a permanent alteration of the night-time seascape character throughout its stated 35-year operational life. This lighting effect is inherently intrusive and unmitigable, as it is both continuous and unavoidable given safety requirements.

Furthermore, the temporal limitation of the operational life does not diminish the significance of the harm in planning policy terms. Granting consent for this development would effectively designate the seascape as appropriate for wind farm use, thereby setting a precedent that prioritises industrial activity over the existing character and tranquillity of the night-time maritime environment. This policy implication underscores the need for careful consideration of whether such a permanent alteration to the seascape is justified.

The proposal, as currently presented, fails to comply with key planning policies designed to safeguard nationally important landscape and seascape interests, resulting in significant practical consequences for the area's environmental integrity. This non-compliance undermines the purpose of these policies, which seek to manage and mitigate adverse effects on valued natural settings. Without adherence to these requirements, the proposal risks causing unacceptable harm to the character and quality of the landscape and seascape, contrary to the intentions of the planning framework.

The applicant’s assessment has not satisfactorily demonstrated that its conclusions regarding the scale of the identified effects align with the methodology it employed. This inconsistency calls into question the reliability of the evaluation and the robustness of any mitigation measures proposed. As a result, there is insufficient evidence to confirm that the project respects the protections afforded by the National Planning Framework 4 (NPF4) Policies 4(c), 4(d), 11(d), and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively aim to ensure that development proposals do not compromise the integrity of nationally significant landscapes and seascapes.

Given these shortcomings, the proposal does not meet the established policy requirements intended to preserve the environmental and visual qualities of the area. To proceed without resolving these issues would be inconsistent with the planning framework’s objectives and could set a concerning precedent for future developments in sensitive locations. Therefore, it is necessary for the proposal to be reconsidered and revised to demonstrate full compliance with the relevant policies before any approval can be justified.

1.1.604 Cultural Landscape, Archaeology and Historic Environment

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

However, a Methodological Audit, conducted independently from the applicant’s Appendix 14.3, finds that while the operational assessment identifies relevant heritage attributes and describes visual changes such as visibility, distance, and screening, it fails to demonstrate the critical evaluative step required by the adopted methodology. The assessment does not show how the integrity of setting has been

properly appraised against the criteria it accepts, merely concluding that it is adequately retained without substantiating this judgment. This omission undermines the reliability of the assessment's conclusions regarding heritage impacts and calls into question the robustness of the applicant's overall evaluation.

The practical consequence of the applicant's approach is that the assessment may underrepresent key aspects of the cultural significance of the heritage assets in question. The applicant's own baseline acknowledges that this significance arises not merely from static features but from dynamic qualities such as pilgrimage routes, arrival by sea, movement through an active cultural landscape, and the interrelationships among monuments, spirituality, and the encompassing landscape and seascape. These elements are experienced through movement rather than from fixed viewpoints, indicating a broader and more immersive cultural context that should be central to any impact evaluation.

Furthermore, Historic Environment Scotland's consultation responses, as recorded within the application, highlight this deficiency by requesting additional viewpoints to ensure these wider experiential qualities are properly represented. This suggests that the current assessment falls short of capturing the full scope of the heritage assets' cultural landscape. Without addressing these concerns, the appraisal risks providing an incomplete understanding of the heritage impacts, potentially leading to mitigation measures that do not fully respect or preserve the assets' cultural significance. It is therefore necessary to incorporate these broader landscape and experiential factors into the assessment to achieve a more comprehensive and accurate evaluation.

The practical consequence of understating landscape effects is a corresponding understatement in the heritage impact conclusions. Since these heritage conclusions rely directly on the landscape assessment, any deficiencies or minimisations within that assessment inevitably carry over, undermining the overall credibility of the heritage evaluation. This interdependence means that if the landscape effects are not fully or accurately accounted for, the subsequent heritage conclusions cannot be considered robust or reliable.

The applicant has failed to demonstrate that the cultural significance of internationally and nationally important heritage assets and their settings will be protected, and the Scottish Ministers do not have before them the necessary assessment to support such a conclusion. This deficiency means the proposal does not comply with NPF4 Policy 7(h) concerning scheduled monuments, nor with Policies 7(c) and 7(d) relating to setting, in addition to GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Without adequate evidence to confirm the safeguarding of these heritage assets, the application falls short of key policy requirements and cannot be considered acceptable in its current form.

1.1.605 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development rely to an exceptional degree on visitors, who are attracted specifically by the qualities identified in the applicant's own baselines: landscape, seascape, cultural heritage, tranquillity, and remoteness. These attributes form the foundation of the visitor experience and

underpin the local economy, making them integral to the viability of these communities. Any alteration to these defining characteristics would therefore have a direct and significant impact on the economic base that sustains these islands.

Such an impact would extend beyond the immediate economic consequences to affect essential local services, population stability, and the overall sustainability of the communities. The interdependence of the economy and social fabric means that changes diminishing the qualities which draw visitors threaten not only financial prosperity but also the continuing viability of these island settlements. It follows that the proposal, by jeopardising the very qualities that attract visitors, poses a fundamental risk to the long-term economic and social sustainability of the island communities.

The applicant's own consultants acknowledge that habitability represents a potentially significant pathway through which the proposed development could impact island communities; however, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 is conducted at a regional scale, focusing in detail on port communities while neglecting a comparable place-based evaluation of the island communities directly facing the development. Despite this omission, the assessment nevertheless concludes that these island communities exhibit low sensitivity to tourism effects.

This approach is fundamentally flawed, as small island economies cannot be accurately represented by regional averages. Such economies tend to be highly concentrated in sectors that are most vulnerable to changes in the environmental and experiential qualities that attract visitors. Moreover, a dependence on increasing visitor numbers does not diminish sensitivity; on the contrary, it intensifies the reliance on those qualities, thereby heightening vulnerability. Therefore, the conclusion of low sensitivity, reached without any place-based analysis of the island communities, lacks evidential support and amounts to an unsubstantiated assumption. This deficiency in the socio-economic assessment methodology calls into question the robustness of the applicant's understanding and mitigation of impacts on island communities.

The proposal fails to meet the required planning and statutory standards in relation to island communities, as it does not provide the necessary assessment or mitigation measures to address their specific socio-economic circumstances. Under GEN 19 and paragraph 4.81 of the National Marine Plan, decision-making must be grounded in robust socio-economic evidence and adopt a precautionary approach where such evidence is insufficient. Furthermore, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 mandate that the interests of island communities be carefully evaluated and afforded appropriate weight, supported by meaningful engagement throughout the planning process. In this context, the proposal's lack of comprehensive assessment undermines its compliance with these policy and statutory requirements.

Moreover, the applicant has acknowledged the need for particular scrutiny of island communities but has not undertaken the necessary evaluation to understand the potential effects on them. There is no demonstration that the proposal aligns with the principles of sustainable island communities, nor that the statutory duties owed to

these communities have been fulfilled. Consequently, the proposal falls short of the established legal and planning frameworks designed to protect island communities, rendering it unacceptable in its current form.

1.1.606 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, with the surrounding waters providing habitat for seabirds, marine mammals, and basking sharks. This ecological context is of considerable importance, as it supports species and habitats recognised for their conservation value and sensitivity. The presence of these features within and adjacent to the site underscores the environmental significance of the location.

The proposed development would introduce activities associated with construction, operation, and decommissioning on a very large scale, extending over several decades. Such sustained and intensive activity within a sensitive marine environment carries the potential for significant adverse effects on the Priority Marine Features and protected species present. Careful consideration must therefore be given to the potential impacts to ensure that the ecological integrity of this important marine area is maintained.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are typically prepared in circumstances where an adverse effect on the integrity of a protected site cannot be definitively ruled out. Their inclusion in the application package signals a recognition by the applicant of potential environmental impacts that may arise, necessitating mitigation and compensation measures to address any harm caused.

This approach implicitly acknowledges that the applicant’s own assessment does not preclude the possibility that Scottish Ministers might reach a different conclusion regarding adverse effects on the protected site. Therefore, the submission of these documents serves not only as a demonstration of intent to manage and compensate for potential impacts but also as a procedural safeguard within the derogation framework. It reflects the applicant’s awareness of the sensitivity of the site and the need to provide robust evidence to support any necessary derogation from conservation objectives.

The applicant acknowledges that under the Habitats Regulations, consent for developments affecting protected sites may only be granted where the competent authority has ascertained that the proposal will not adversely affect the integrity of the site, unless the stringent derogation tests are satisfied. It is emphasised that consent can lawfully be granted only where no reasonable scientific doubt remains regarding potential impacts. The burden of proof lies with the applicant to demonstrate this high evidential standard.

Furthermore, the applicant recognises that mitigation, compensation proposals, and future monitoring, while important, do not by themselves satisfy the statutory tests required under the Habitats Regulations. This rigorous approach ensures that all

potential effects on protected habitats and species are thoroughly assessed before any consent is granted, reflecting the precautionary principle embedded within the legislation.

This legal framework is supported and reinforced by relevant policy provisions, including GEN 9 and GEN 13 of the National Marine Plan and Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. Together, these policies establish a comprehensive and robust framework to safeguard protected sites, ensuring that decisions on consent are made with the utmost regard to environmental protection and legal compliance.

There remains significant uncertainty surrounding the applicant's ability to satisfy the statutory tests designed to protect internationally important habitats and species. The evidence submitted, including the applicant's own derogation documents, clearly indicates that the level of certainty required by law has not been met. This fundamental gap undermines confidence that the proposed development would avoid causing unacceptable harm to protected ecological features.

Given this unresolved uncertainty, the application fails to demonstrate compliance with the stringent legal requirements intended to safeguard internationally important ecological assets. Without clear assurance that these statutory tests can be fulfilled, the balance must weigh against granting consent. It is therefore appropriate to refuse the application on the grounds that the necessary protections for these critical natural interests have not been convincingly secured.

1.1.607 Cumulative and In-Combination Effects

The current assessment process for the project fails to provide a comprehensive evaluation of its environmental and operational impacts, as only a portion of the development—the wind farm itself—is before the Scottish Ministers. Crucially, key components such as the export cable corridor and onshore transmission works, which are essential for the wind farm's operation, are deferred to separate future applications. This fragmented approach precludes a full understanding of the cumulative effects, as the necessary infrastructure enabling the project's function is excluded from the initial consent. Consequently, significant impacts are deferred to subsequent consenting stages, limiting the ability of decision-makers to consider the project's totality at once.

This method of piecemeal assessment is inconsistent with established legal principles, notably those upheld in Raeshaw Farms, which emphasise that a project must be evaluated in its entirety rather than divided into smaller segments to minimise apparent individual effects. By salami-slicing the development into separate parts, the assessment undermines the procedural requirement for holistic scrutiny and risks overlooking cumulative impacts that could influence the overall acceptability of the proposal. Therefore, the current approach is procedurally and legally flawed, and it is imperative that the full scope of the project, including all integral elements, is assessed together to ensure a robust and lawful decision-making process.

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

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

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

1.1.608 Public Engagement, Site Selection and Environmental Information

The practical consequence of the deficiencies in public participation and consultation timing is a significant undermining of the legitimacy of the site-selection process. The applicant urges the Scottish Ministers to place substantial weight on this process; however, the inadequate opportunities for meaningful engagement at both the plan and site-selection stages have persisted into the current application phase. The application itself encompasses thousands of pages of complex technical documentation, yet the consultation period coincided with the busiest months for island communities, a time when residents are fully occupied with continuous work during the visitor season and when access to specialist advice is particularly limited. This imbalance is stark, especially considering the applicant has had years of preparation supported by considerable professional and financial resources.

The National Marine Plan’s guidance, specifically GEN 18, alongside the principles of effective public participation enshrined in the Aarhus Convention, establish that those affected by such decisions must have a genuine and realistic opportunity to engage. The conditions imposed on the island communities in this instance fall short of that established standard. This shortfall in meaningful engagement compromises the fairness and inclusiveness that underpin sound decision-making processes in matters of this scale and significance.

In light of these considerations, it is imperative that the Scottish Ministers give due weight to the inadequacies of the consultation process when evaluating the representations presented. Failure to adequately address these deficiencies would not only diminish public confidence in the planning system but also risk decisions being made without the full and fair input of those most directly affected. Therefore, the consultation process as it stands cannot be regarded as meeting the required standards of effective public participation.

The practical consequence of the deficiencies identified in the Environmental Impact Assessment (EIA) is that the Scottish Ministers are unable to make a fully informed decision on this application. The EIA is the principal evidential basis for determination, and it is not a question of its extensiveness but rather its sufficiency. Across multiple topic areas, the application acknowledges pathways to significant effects yet fails to investigate them thoroughly. For instance, the landscape assessment derives outcomes based on a distance pattern that its own stated methodology does not support. Similarly, the heritage assessment does not adequately demonstrate the application of its own integrity test, and the socio-economic assessment lacks any place-based analysis pertinent to the affected islands. Furthermore, reliance on future assessments, post-consent plans, ongoing monitoring, and additional approvals cannot substitute for the requirement under the EIA Regulations that likely significant effects be fully understood prior to determination. The Scottish Ministers must base their decision on the evidence currently before them, rather than on assumptions that unresolved matters will be satisfactorily addressed at a later stage. In light of these shortcomings, the applicant has not demonstrated that the environmental information submitted meets the necessary standard of adequacy for determination purposes.

1.1.609 Effects on Local Area

The development area extends over 448 square kilometres immediately north-west of Islay and west of Colonsay, placing the Atlantic-facing communities of these islands in closest proximity to the proposed project. Despite this, the applicant’s assessment primarily addresses Islay as a potential project location rather than evaluating it as an affected island community, neglecting any place-based analysis of impacts on its setting, economy, or community life. This omission undermines the reliability of the environmental and heritage impact evaluation in respect of Islay’s distinct local context.

Similarly, Colonsay and Oronsay face the array directly, with their daily life intimately connected to the seaward outlook. Of particular significance is the North Colonsay and Western Cliffs Special Protection Area, which forms part of Colonsay’s own coastline and is central to the applicant’s derogation case and compensation plan. This area’s inclusion highlights the acknowledged but unexcluded risk of harm to internationally protected seabird populations. Moreover, Oronsay Priory, a scheduled monument of national importance, lies within this community, yet the heritage assessment fails to adequately consider its open maritime setting. These gaps collectively demonstrate that the applicant’s evaluation underestimates the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay.

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

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

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

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

However, the assessment's reliance on distance-based reasoning, particularly regarding the Wilderness and Gribun Rocks coastal area where a viewing distance of over 30 kilometres leads to a conclusion of only small scale change, illustrates a fundamental inadequacy. This approach underestimates the visual, economic, and

community impacts on Mull's west-facing tourism economy, which depends heavily on the unspoiled Atlantic seascape that the development would industrialise. The wildlife boat operations and accommodation sectors supporting the western townships are intimately tied to this landscape, yet none of these communities have received place-specific assessment. Consequently, the applicant's evaluation fails to fully address the significant effects on designated landscapes and tourism-dependent communities across Mull and the Ross of Mull.

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

The applicant's assessment assigns a Low magnitude of change to the South Tiree coastal area despite its High sensitivity, a conclusion that warrants careful scrutiny. When compared to mitigation approaches in similar contexts, such a Low magnitude classification appears incongruous given the distinctive characteristics of Tiree's landscape. The island's topography is exceptionally flat, with its highest elevation, Ben Hynish, reaching only 141 metres. This means that the landscape's defining features are the expansive sea and sky, which together create an open and unobstructed oceanic horizon. Introducing turbines reaching heights of up to 335 metres would impose vertical elements that are without precedent in this seascape, fundamentally altering the visual and experiential qualities of the area. The apparent minimisation of these effects contradicts the sensitivity acknowledged and is inconsistent with mitigation standards applied in comparable sensitive environments.

Furthermore, the Low magnitude conclusion fails to capture the true scale of change and impact on Tiree's sensitive and distinctive landscape character. Given the island's unique reliance on uninterrupted oceanic views and the absence of existing tall structures, the presence of turbines over twice the height of the highest natural point would be visually dominant and intrusive. This significant discordance between the landscape's character and the proposed development's scale demonstrates that the assessment understates the magnitude of change, leading to an unreliable evaluation of effects. Consequently, the impact on Tiree's landscape has been

insufficiently recognised, and this underestimation undermines confidence in the assessment's conclusions.

While the applicant's assessment acknowledges certain mitigation measures based on distance-related factors, these do not adequately address the significant effects experienced by mainland and island communities with direct visual and economic connections to the seascape. Notably, the community-owned island of Gigha, renowned as a national symbol of island regeneration following its purchase by local residents, lies to the east of the proposed development. The assessment fails to consider the implications for Gigha's finely balanced community and economy, which are closely intertwined with the surrounding waters. Similarly, Ardnamurchan Point—the most westerly tip of the British mainland—offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the sensitive receptors that the applicant's distance-based mitigation approach inadequately moderates. Moreover, the west coast of Kintyre encompasses a series of communities whose identity, character, and visitor economy are fundamentally shaped by their outlook towards the open Atlantic seaboard, including views towards Islay, Jura, and the wider surrounding waters. The Treshnish Isles and other adjacent small islands and mainland coasts share this direct visual relationship with the development site. Taken together, the omission of these receptors from the assessment undermines the comprehensiveness and reliability of the applicant's evaluation of potential effects. It is therefore essential that a more thorough and inclusive appraisal be undertaken to fully understand and address the likely impacts on these sensitive mainland and island communities.

The applicant's distance-based methodology systematically moderates and discounts environmental effects on sensitive receptors located beyond approximately 20 kilometres, resulting in an underestimation of impacts that compromises the environmental impact assessment's integrity. Specifically, the assessment reduces the magnitude of change attributed to highly sensitive receptors at these distances, effectively diminishing the perceived severity of effects. This approach overlooks the lived experiences of communities situated beyond the 20-kilometre threshold, as no place-based assessment has been conducted to capture the specific local impacts they endure. Consequently, the current evaluation fails to provide a comprehensive understanding of the environmental consequences, thereby undermining the robustness and credibility of the overall assessment.

1.1.610 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the relevant statutory and policy criteria governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal area. Moreover, published analyses of the applicant's documentation reveal that these impacts have been underestimated, and the necessary heritage assessment has not been completed. While the effects on the island communities involved were identified, they have never undergone proper assessment. Additionally, the ecological requirements have not been demonstrated to be achievable. It is also noteworthy that only a portion of the project falls under the jurisdiction of the Scottish Ministers.

In light of these deficiencies, it is respectfully submitted that the Scottish Ministers should refuse consent for the MachairWind Offshore Wind Farm and decline the associated marine licence.

Should the Ministers consider granting consent, it is requested that they require the submission of further environmental information and enhanced visualisations. Furthermore, the applications should be determined only following a public inquiry, which would enable a thorough examination of the concerns outlined in this representation. Regardless of the decision reached, it is also urged that the Ministers explicitly address the impacts on cultural heritage and the affected island communities within their final reasons.

Yours faithfully,

[Redacted]

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

Member of the public 565
Dear Sir/Madam,

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

The project under consideration involves the construction of an offshore wind farm with an approximate capacity of 2 gigawatts. This development would consist of between 91 and 144 turbines, each reaching up to 335 metres to blade tip, situated within a designated Windfarm Development Area encompassing around 448 square kilometres. The proposed site lies to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and is in close proximity to the islands and coastal settlements of the southern Hebrides.

The following sections articulate the grounds for objection in terms of planning and environmental considerations, framed within the applicable statutory and policy context governing the determination of these applications. It is important to emphasise that the onus is on the applicant to provide sufficient evidence to satisfy all relevant legal and policy tests. Objectors are not required to disprove the proposal but rather to highlight where the applicant has failed to meet this burden. In this instance, the applicant has not demonstrated compliance with these standards, and accordingly, the applications should be refused consent.

1.1.611 Seascape, Landscape and Visual Effects

The applicant’s written methodology, as set out in Appendix 16.1, does not specify a distance threshold beyond which major effects are considered to cease. However, an independently prepared Evidence Note, drawing exclusively on the applicant’s Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, irrespective of receptor sensitivity or visibility extent. This implicit role of distance is further demonstrated by the applicant’s own documents, which assess a coastal area over 30 kilometres distant by concluding that, given the viewing distance, the scale of change is small. Additionally, the Landscape Character synthesis describes High magnitude effects within about 20 kilometres, Medium effects between roughly 20 and 30 kilometres, and Low effects beyond 30 kilometres for certain landscape types. Consequently, the protective assessments appear to rely on systematically moderated magnitude inputs at precisely the distances where the most sensitive designated landscapes are located. This methodological approach results in conclusions that do not reliably reflect the true effects that the Scottish Ministers are being asked to consider.

1.1.612 Cultural Landscape, Archaeology and Historic Environment

There remains uncertainty as to whether the applicant's assessment fully captures the cultural significance and baseline qualities of the heritage assets affected. The applicant's own baseline acknowledges that this significance arises not only from individual monuments but also from broader experiential factors such as pilgrimage, arrival by sea, movement through a living cultural landscape, and the intricate relationships between monuments, spirituality, and the surrounding landscape and seascape. These qualities are experienced dynamically through movement rather than from fixed viewpoints. Furthermore, Historic Environment Scotland's consultation responses, as recorded within the application, have explicitly requested additional viewpoints to ensure these wider qualities are properly represented. Given this, it is unclear that the assessment adequately reflects the full breadth of cultural significance, which raises concerns about the robustness of the heritage impact analysis presented.

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

1.1.613 Effects on Island Communities, Tourism and the Local Economy

The proposal poses a serious threat to the fundamental economic and social sustainability of the island communities concerned. These communities rely to an exceptional degree on visitors, whose arrival is motivated precisely by the qualities identified in the applicant's own baseline assessments: the landscape, seascape, cultural heritage, tranquillity, and remoteness of the area. Any changes to these defining characteristics would directly undermine the economic base of these communities. This economic harm would, in turn, affect essential local services, reduce population retention and growth, and jeopardise the ongoing viability of the communities themselves. In light of these factors, the proposal should be viewed as incompatible with the long-term sustainability of the island communities it would impact.

1.1.614 Effects on Local Area

The applicant's assessment notably underestimates the scale and significance of visual, community, and heritage impacts on Iona, thereby compromising the accuracy of the environmental and social impact evaluation. The Coastal Character assessment identifies the Sound of Iona as an area of High sensitivity, with extensive visibility and a Large geographical extent of change. The turbines would be visible across approximately 39 degrees of the horizon from a distance of some 21 kilometres, producing a Moderate and Significant overall effect. Similarly, the

West Coast of Iona is recognised as highly sensitive, with widespread visibility; the applicant concedes significant effects on residents and visitors across much of the island, including at Dùn Ì, Iona's highest point.

Iona's monastic landscape, comprising internationally important heritage assets such as the Abbey, the Nunnery, and the high crosses, is intrinsically linked to experiences of pilgrimage, arrival by sea, and movement through the landscape. Despite Historic Environment Scotland's request for additional viewpoints—including from the ferry crossing itself—no visualisation is provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, an omission that weakens the thoroughness of the heritage impact assessment. Moreover, a household consultation on Iona revealed that 92 per cent of respondents oppose the proposal, yet the applicant's consultants fail to assess habitability, despite identifying it as a potential pathway of effect on the community. To contextualise the visual scale, the tallest turbines would exceed Ben Hynish on Tiree—visible from Iona at approximately 33 kilometres and standing 141 metres high—by roughly 194 metres, at a closer distance of around two-thirds of that range.

In light of these factors, the applicant's evaluation does not adequately reflect the magnitude of impacts on Iona's landscape, community, and heritage values. This underestimation undermines the credibility of the environmental and social impact assessment and calls for a more comprehensive and rigorous appraisal before the proposal can be properly considered.

The applicant acknowledges significant effects on several key areas of Mull and Ross of Mull, including the Ross of Mull South coastal area, where High sensitivity is identified at distances of approximately 22 to 24 kilometres with a Medium magnitude assigned. Notably, significant impacts are accepted at Erraid and on the Core Paths of the Ross, as well as at Fionnphort, the principal gateway to Iona and the embarkation point for visitors, whose experience is recognised as significantly affected. This community is particularly vulnerable due to its direct reliance on visitor flows. Across Mull more broadly, the applicant concedes significant effects on Core Paths and within the Central, South and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, which encompasses Mull's western waters and islands and is assessed as being of High sensitivity at distances between 21 and 33 kilometres, is nonetheless assigned no greater than a Medium magnitude of effect. In the Wilderness and Gribun Rocks coastal area, the applicant's reliance on viewing distances exceeding 30 kilometres to justify a small scale of change exemplifies a distance-based methodology that fails to capture the significance of impacts. Furthermore, the west-facing tourism economy of Mull, including wildlife boat operators and accommodation providers within western townships, depends fundamentally on the unspoiled Atlantic seascape that the proposed development would industrialise. Yet, despite this clear vulnerability, none of these communities has been afforded a place-based assessment. Taken together, these points indicate that the applicant's assessment inadequately addresses the substantial visual, economic, and community impacts on the designated landscapes and tourism-dependent communities of Mull and Ross of Mull.

1.1.615 Further Comments

Mull and Iona is the site of two monasteries to which I am connected. They and much of the island rely on tourism such a project could have negative effects on tourism to the isles and to them.

1.1.616 Summary

The proposal for the MachairWind Offshore Wind Farm fails to demonstrate compliance with the relevant statutory and policy frameworks governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the coastal communities and heritage; however, published analyses of the applicant's documentation reveal that these impacts have been underestimated. Crucially, the requisite heritage assessment has not been conducted, and although the effects upon the island communities were identified, no assessment of these impacts has been undertaken. Additionally, the ecological criteria necessary for approval have not been demonstrated as achievable. It is also pertinent to note that only a portion of the project is subject to consideration by the Scottish Ministers.

In light of these shortcomings, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to reject the accompanying marine licence application.

Should the Ministers decide against refusal, it is requested that they require the submission of further environmental information and enhanced visualisations. Furthermore, the determination of the applications should be deferred until after a public inquiry, enabling a comprehensive examination of the issues raised in this objection. Regardless of the outcome, I ask that the Ministers provide clear and explicit conclusions within their decision, specifically addressing the effects on cultural heritage and the impacted island communities.

Yours faithfully,

[Redacted]

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

Member of the public 566
Dear Sir/Madam,

I hereby formally oppose the MachairWind Offshore Wind Farm proposals submitted by MachairWind Limited (ScottishPower Renewables) under application numbers 00012385 and 00012386, seeking consent pursuant to section 36 of the Electricity Act 1989 and a marine licence under Part 4 of the Marine (Scotland) Act 2010 respectively. I request that this correspondence be recorded as an official objection, that I am registered accordingly, and that I receive notification of the final determination relating to these applications.

The development in question proposes an offshore wind farm with an installed capacity of approximately 2 gigawatts, consisting of between 91 and 144 turbines each reaching up to 335 metres in height to blade tip. The proposed site occupies a Windfarm Development Area of around 448 square kilometres in the sea to the north-west of Islay and west of Colonsay, situated roughly 21 kilometres from Iona, and in proximity to various islands and coastal communities within the southern Hebrides.

The following discussion presents the planning and environmental grounds for objection, firmly grounded in the statutory and policy context applicable to the determination of these proposals. It must be emphasised that the onus lies entirely with the applicant to provide adequate evidence demonstrating compliance with all relevant legal and policy tests. Objectors bear no responsibility to disprove the application. Upon careful consideration, it is evident that the applicant has failed to meet this evidential burden, and for the reasons elucidated herein, the applications should be refused consent.

1.1.617 Legislative and Policy Framework

The application fails to demonstrate adequate compliance with the statutory duties under Schedule 9 of the Electricity Act 1989, particularly in relation to the requirement to take reasonable steps to mitigate adverse effects on natural beauty, flora, fauna, geological or physiographical features of special interest, and sites, buildings, or objects of architectural, historic, or archaeological interest. Schedule 9 explicitly mandates that both the applicant and the Scottish Ministers must have regard to these considerations and ensure that mitigation measures are reasonably implemented to address any harmful impacts arising from the proposal.

The evidence confirms that the applicant has not satisfactorily shown that these statutory duties have been met. There is a clear absence of sufficient mitigation measures to preserve the natural and cultural heritage interests identified. This failure constitutes a significant deficiency in the application, as it does not adequately address the preservation of natural beauty or the conservation of important ecological and heritage assets as required by law. Furthermore, the application lacks the necessary demonstration that reasonable steps have been taken to avoid or reduce adverse effects on these protected interests.

Given that compliance with these statutory duties has not been established, and that the evidence reveals omissions and conflicts with the applicable legal and policy

framework, these shortcomings must weigh decisively against the granting of consent. The application's failure to meet the explicit requirements of Schedule 9 of the Electricity Act 1989 represents a fundamental legal and procedural defect that cannot be overlooked in the determination process.

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017, alongside the equivalent marine works regulations, mandate that any proposal must have its likely significant environmental effects identified, assessed, and reported prior to determination. Additionally, the Habitats Regulations require a thorough assessment of the proposal's effects on European protected sites in accordance with the relevant statutory tests. These legal requirements establish a clear procedural framework to ensure environmental protection and compliance before any consent is granted.

In this case, the applicant has failed to demonstrate compliance with these statutory obligations. The evidence reveals deficiencies and omissions in the environmental impact assessment and habitats regulations assessment, with no adequate demonstration that the proposal's effects on protected sites have been properly evaluated against the required legal standards. Such failures constitute a direct conflict with the applicable legal and policy framework. Consequently, these shortcomings must weigh decisively against the granting of consent for the proposal.

The proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018, resulting in a significant procedural deficiency. This statutory requirement obliges decision-makers to explicitly address and give due weight to the unique circumstances and needs of island communities during the planning process. The absence of demonstrated compliance with this duty undermines the integrity of the decision-making framework and contravenes the legal obligations set out in the Act.

Furthermore, the evidence identifies clear omissions and deficiencies in the proposal's assessment regarding island communities, which conflict with the applicable legal and policy framework. Where such failures occur, established guidance confirms that these matters must weigh against the granting of consent. In this case, the lack of adequate consideration of island community interests constitutes a material failure that should result in refusal of the application.

The applicant has failed to provide robust, objective, and proportionate evidence demonstrating compliance with every relevant statutory duty, planning policy, and environmental assessment requirement. This failure represents a fundamental deficiency in the application, as the evidential burden to prove such compliance rests squarely with the applicant. The absence of such demonstration means that the application does not meet the necessary legal and policy standards.

Furthermore, the evidence submitted reveals omissions and conflicts with the applicable legal and policy framework. These unresolved matters are not minor procedural oversights but substantive shortcomings that directly undermine the legitimacy of the application. In accordance with established principles, where compliance is not demonstrated or where deficiencies exist, these factors must weigh decisively against the granting of consent.

In conclusion, the applicant has not fulfilled the essential responsibility to prove adherence to all statutory and policy requirements. This failure constitutes a clear and compelling reason to refuse consent.

1.1.618 Conflict with National Planning Framework 4 and the Development Plan

NPF4 Policy 11 explicitly supports renewable energy development; however, this support is conditional upon compliance with the policy's own impact criteria. These criteria include Policy 11(c), which addresses impacts on communities, as well as Policies 11(d) and 11(e), which concern impacts on landscape, seascape, and other receptors. The policy framework therefore requires that renewable energy proposals must not only contribute to energy goals but must also satisfactorily mitigate or avoid adverse effects on these key considerations.

In the case of the current proposal, it fails to meet these essential impact criteria. The evidence demonstrates that the development would cause significant adverse effects on nationally designated landscapes and seascapes, thereby conflicting with Policies 11(d) and 11(e). Furthermore, there is no clear demonstration that the cultural significance of scheduled monuments and their settings would be adequately protected, nor that island communities would be safeguarded in line with Policy 11(c). Additionally, the ecological tests required by the policy have not been shown to be met based on the submitted evidence. Consequently, the proposal is not consistent with the impact criteria set out in NPF4 Policy 11, undermining the policy's support for renewable energy development in this instance.

The proposal fails to comply with multiple national planning policies designed to protect designated assets, resulting in significant practical consequences for nationally important landscapes, heritage assets, and biodiversity. Policy 11 must be read alongside Policies 4(c) and 4(d), which specifically safeguard National Scenic Areas and other nationally important landscapes from significant adverse effects on the qualities for which they are designated. Additionally, Policy 7 addresses the protection of scheduled monuments, including Policy 7(h) focused on these heritage assets, and Policies 7(c) and 7(d), which protect the settings of historic assets. Policy 3 sets out requirements to conserve biodiversity, further underpinning the importance of safeguarding ecological interests.

The evidence demonstrates that the proposal would cause significant adverse effects on nationally designated landscapes and seascapes, undermining the qualities that justify their designation. Moreover, the applicant has not adequately demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, raising concerns about the integrity of these heritage assets. The proposal also fails to show that island communities would be effectively safeguarded, an important consideration given the localised nature of such populations. Crucially, the ecological tests required under Policy 3 have not been shown to be met on the evidence submitted, indicating that the proposal does not adequately address biodiversity protection.

In summary, the proposal conflicts with the suite of relevant NPF4 policies protecting nationally important landscapes, heritage assets, and biodiversity. It fails to

demonstrate that the significant adverse effects identified can be appropriately mitigated or avoided, and as such, it should not be supported in its current form.

1.1.619 Seascape, Landscape and Visual Effects

The applicant's assessment methodology, as outlined in Appendix 16.1, notably omits any explicit distance threshold beyond which major effects are considered to cease. However, an independent Evidence Note, which critically examines the applicant's Chapter 16 and related appendices, reveals a consistent pattern: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of that receptor's inherent sensitivity or the extent of visibility. This inherent reliance on distance is further corroborated by the applicant's own documentation, which acknowledges that for a coastal area over 30 kilometres away, the scale of change is judged to be small due to viewing distance. The Landscape Character synthesis likewise categorises magnitude of impact as High within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types.

This systematic moderation of magnitude at distances coinciding with the locations of the most sensitive designated landscapes raises serious concerns regarding the robustness of the assessment's conclusions. By attenuating the perceived magnitude of change precisely where the most important receptors lie, the protective tests applied are effectively based on understated inputs. Consequently, the outcomes presented do not reliably reflect the true effects that the Scottish Ministers are being asked to consent to, thereby undermining confidence in the assessment's capacity to safeguard sensitive landscapes adequately.

While mitigation measures are often informed by visual assessments, it is important to recognise the inherent limitations of the visualisation materials employed. The applicant's adherence to NatureScot's visualisation guidance ensures a standardised approach; however, this guidance explicitly acknowledges that printed visualisations cannot fully replicate the scale or immersive experience perceived by a viewer in the field. Consequently, reliance on these materials may understate or distort the actual visual impact of a development.

Furthermore, the wireline drawings included alongside photographic panoramas are not independent tools that correct or enhance the photographic evidence; rather, they are technical renderings subject to the same perceptual constraints as the photographs they accompany. This means that both forms of visualisation share inherent limitations and should be interpreted cautiously when assessing the true visual effects. Given these constraints, decision-makers should consider the potential discrepancies between visualisation materials and real-world perception when evaluating the visual impact of the proposal.

The applicant's evidence acknowledges that the proposed development results in effects that engage several key policies, specifically NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), alongside GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively aim to safeguard nationally important landscapes and seascapes from adverse impacts. However, despite recognising these policy

requirements, the applicant has not satisfactorily demonstrated that its assessment of the scale of these effects aligns consistently with its own stated methodology.

Moreover, the applicant has failed to establish compliance with the protections afforded to nationally significant landscape and seascape interests. Without clear evidence to reconcile the conclusions drawn with the necessary policy safeguards, it remains uncertain that the proposal respects the statutory framework designed to preserve these valued environmental assets. This lack of demonstrable compliance raises substantive concerns regarding the proposal's conformity with relevant planning policies.

1.1.620 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment employs the methodology recognised by Historic Environment Scotland for evaluating effects on the setting of historic assets. This methodology, developed through consultation with Historic Environment Scotland, mandates an evaluation of whether changes to setting affect the contribution that setting makes to the cultural significance of an asset and whether the integrity of that setting is adequately retained. Crucially, it clarifies that visual change alone should not be directly equated with adverse impact, emphasising a need for a considered evaluative approach beyond mere description of visibility or visual intrusion.

However, a Methodological Audit prepared in support of community objections, relying solely on the applicant's Appendix 14.3, finds that while the operational assessment identifies relevant heritage attributes, it fails to demonstrate how the integrity of setting has been assessed in accordance with the applicant's own accepted methodology. The assessment focuses predominantly on describing aspects such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, before concluding that the integrity of setting is adequately retained. This critical evaluative step required by the methodology is not evidenced in any of the detailed examples examined by the Audit. Consequently, the reliability of the applicant's conclusions about heritage impacts is undermined by the absence of a transparent and rigorous application of the prescribed assessment process.

1.1.621 Effects on Island Communities, Tourism and the Local Economy

While mitigation measures may seek to address certain impacts, they cannot fully compensate for the fundamental harm posed by the proposal to the qualities that attract visitors to the island communities in question. The applicant's own baseline assessments identify key attributes such as landscape, seascape, cultural heritage, tranquillity and remoteness as the primary reasons visitors are drawn to these areas. These qualities form the essential foundation upon which the local economies depend, and any alteration or degradation of these attributes would have profound consequences.

The exceptional reliance of these island communities on visitor-generated income means that changes undermining their appeal strike directly at their economic base. This, in turn, jeopardises the provision of local services, threatens population retention, and undermines the overall social and economic sustainability of these

communities. It is therefore clear that the proposal, by impacting the very qualities that attract visitors, poses a serious risk to the continuing viability of the islands. Such fundamental effects cannot be adequately mitigated and must be given significant weight in the planning decision.

The applicant's failure to assess habitability impacts on island communities undermines the reliability of their socio-economic conclusions and risks overlooking significant adverse effects. Their own consultants acknowledged habitability as a potentially significant pathway of impact, yet no specific assessment was undertaken for the affected islands. Instead, the socio-economic evaluation in Chapter 18 is conducted at a regional scale, focusing on port communities while neglecting a place-based analysis of the island communities directly facing the development. Despite this omission, the assessment concludes that these island communities have low sensitivity to tourism effects, a finding unsupported by targeted evidence.

Island economies are distinct from regional averages; they rely heavily on sectors directly tied to the qualities that attract visitors. This economic concentration heightens their vulnerability rather than mitigating it, as dependence on increasing visitor numbers intensifies sensitivity to changes in those visitor-attracting attributes. Therefore, concluding low sensitivity without a detailed, place-specific assessment is not a substantiated finding but rather an unproven assumption. This methodological flaw renders the socio-economic assessment inadequate for understanding or mitigating the proposal's impacts on island communities.

The applicant acknowledged that island communities require particular scrutiny but failed to undertake the necessary assessment to understand the effects of the proposal upon them. This omission means that it has not demonstrated compatibility with sustainable island communities, nor has it shown that the statutory duties owed to these communities have been fulfilled. This shortfall is significant in light of the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions be based on sound socio-economic evidence and adopt a precautionary approach where such evidence is lacking. Furthermore, the proposal does not comply with NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, both of which require that the interests of island communities be assessed and given due weight through meaningful engagement from the inception of a project to its conclusion. In the absence of such rigorous assessment and engagement, the proposal does not meet the required planning and statutory standards for protecting island communities.

1.1.622 Ecology, Biodiversity and Habitats Regulations

The proposed development site encompasses Priority Marine Features and Annex I habitats, which are recognised for their ecological sensitivity and conservation importance. These designations indicate habitats that are critical for the maintenance of marine biodiversity and are afforded protection under relevant environmental policies. The surrounding waters additionally provide habitat for protected species, including seabirds, marine mammals and basking sharks, all of which contribute to the ecological value of the area. While mitigation measures may be proposed to reduce adverse effects, the scale and duration of construction, operation and

decommissioning activities—extending over decades—pose significant challenges to effectively safeguarding these sensitive features.

In comparison to typical mitigation strategies, the magnitude of the proposed development's environmental footprint within this marine environment raises concerns regarding residual impacts. The large-scale, long-term nature of the activities may limit the effectiveness of conventional mitigation, potentially resulting in significant adverse environmental effects. Given the presence of Priority Marine Features and protected species within and around the site, careful reconsideration of the development's scope, timing and mitigation approach is necessary to ensure compliance with environmental protection standards and to prevent irreversible harm to these important ecological assets.

The 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.

1.1.623 Cumulative and In-Combination Effects

The current assessment approach is fundamentally flawed as it fails to consider the project in its entirety. Only a portion of the project—the wind farm itself—is before the Scottish Ministers, while critical components such as the export cable corridor and the onshore transmission works have been deferred to later applications. Given that these elements are essential for the operation of the wind farm, their exclusion means the full range of effects cannot be evaluated together at this stage.

This fragmented approach runs counter to established legal principles. The courts, notably in Raeshaw Farms, have affirmed that a project must be assessed as a whole and not divided into smaller parts whose individual impacts might appear less significant. By permitting important components to be considered separately after the principal decision, the process undermines the integrity of the overall environmental assessment and fails to provide a comprehensive evaluation of the project's cumulative effects.

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

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

1.1.624 Public Engagement, Site Selection and Environmental Information

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

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

1.1.625 Effects on Local Area

The applicant's assessment acknowledges Islay and Colonsay as the closest islands to the development area, which lies immediately north-west of Islay and west of Colonsay. However, the application predominantly evaluates Islay only as a potential project location rather than as a distinct island community subject to direct effects. Notably, the Atlantic-facing communities of Islay confront the nearest edge of a substantial 448 square kilometre development area, yet there is no place-based analysis of how this proximity might affect their setting, local economy, or community life. This omission undermines the assessment's comprehensiveness in addressing the real and tangible impacts on Islay's residents.

Regarding Colonsay and Oronsay, the daily lives of these communities are intimately connected to their seaward outlook, which faces the development array directly. The North Colonsay and Western Cliffs Special Protection Area, situated along Colonsay's coastline, is central to the applicant's derogation case and compensation plan, implicitly acknowledging that harm to the internationally protected seabird populations cannot be ruled out. Furthermore, Oronsay Priory, a nationally important scheduled monument, lies within this community's area. The identified gaps in the heritage assessment similarly apply here, particularly concerning the treatment of the priory's open maritime setting. Taken together, these considerations demonstrate that the application underestimates the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, casting doubt on the reliability of the overall environmental and heritage impact evaluation.

The applicant's assessment notably underestimates the scale and significance of visual, community, and heritage impacts on Iona, thereby compromising the accuracy of the environmental and social impact evaluation. The Coastal Character assessment identifies the Sound of Iona as an area of High sensitivity, with extensive visibility and a Large geographical extent of change. The turbines would be visible across approximately 39 degrees of the horizon from a distance of some 21 kilometres, producing a Moderate and Significant overall effect. Similarly, the West Coast of Iona is recognised as highly sensitive, with widespread visibility; the applicant concedes significant effects on residents and visitors across much of the island, including at Dùn Ì, Iona's highest point.

Iona's monastic landscape, comprising internationally important heritage assets such as the Abbey, the Nunnery, and the high crosses, is intrinsically linked to experiences of pilgrimage, arrival by sea, and movement through the landscape. Despite Historic Environment Scotland's request for additional viewpoints—including from the ferry crossing itself—no visualisation is provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, an omission that weakens the thoroughness of the heritage impact assessment. Moreover, a household consultation on Iona revealed that 92 per cent of respondents oppose the proposal, yet the applicant's consultants fail to assess habitability, despite identifying it as a potential pathway of effect on the community. To contextualise the visual scale, the tallest turbines would exceed Ben Hynish on Tiree—visible from Iona at approximately 33 kilometres and standing 141 metres high—by roughly 194 metres, at a closer distance of around two-thirds of that range.

In light of these factors, the applicant's evaluation does not adequately reflect the magnitude of impacts on Iona's landscape, community, and heritage values. This underestimation undermines the credibility of the environmental and social impact assessment and calls for a more comprehensive and rigorous appraisal before the proposal can be properly considered.

The applicant acknowledges significant effects on several key areas of Mull and Ross of Mull, including the Ross of Mull South coastal area, where High sensitivity is identified at distances of approximately 22 to 24 kilometres with a Medium magnitude assigned. Notably, significant impacts are accepted at Erraid and on the Core Paths of the Ross, as well as at Fionnphort, the principal gateway to Iona and the embarkation point for visitors, whose experience is recognised as significantly affected. This community is particularly vulnerable due to its direct reliance on visitor flows. Across Mull more broadly, the applicant concedes significant effects on Core Paths and within the Central, South and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, which encompasses Mull's western waters and islands and is assessed as being of High sensitivity at distances between 21 and 33 kilometres, is nonetheless assigned no greater than a Medium magnitude of effect. In the Wilderness and Gribun Rocks coastal area, the applicant's reliance on viewing distances exceeding 30 kilometres to justify a small scale of change exemplifies a distance-based methodology that fails to capture the significance of impacts. Furthermore, the west-facing tourism economy of Mull, including wildlife boat operators and accommodation providers within western townships, depends fundamentally on the unspoiled Atlantic seascape that the proposed development would industrialise. Yet, despite this clear vulnerability, none of these communities has been afforded a place-based assessment. Taken together, these points indicate that the applicant's assessment inadequately addresses the substantial visual, economic, and community impacts on the designated landscapes and tourism-dependent communities of Mull and Ross of Mull.

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

designated landscapes and island communities, weakening the safeguards intended to preserve their distinctive character and vitality.

The applicant's assessment recognises the South Tiree coastal area as having High sensitivity at a distance of approximately 35 kilometres but assigns a Low magnitude of change to the proposed development. This evaluation, however, significantly understates the true magnitude of impact on Tiree's distinctive landscape character. Tiree is an exceptionally low-lying island, with its highest point, Ben Hynish, rising to only 141 metres, and its landscape defined by the expansive dominance of sea and sky. The introduction of turbines up to 335 metres in height would create vertical structures unprecedented within this open oceanic horizon. Such large-scale additions would markedly alter the seascape, contradicting the applicant's conclusion of Low magnitude change. Given the exposed and sensitive nature of this receptor, the assessment's low magnitude finding is an unreliable evaluation that fails to adequately reflect the substantial and intrusive visual effects on Tiree's unique coastal environment.

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

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

The applicant's environmental impact assessment employs a distance-based mitigation approach that systematically moderates and discounts effects on sensitive receptors located beyond approximately 20 kilometres. This methodology effectively diminishes the perceived magnitude of change experienced by these communities, contrasting with the more detailed and place-specific assessments conducted within the 20-kilometre zone. By applying a generalized attenuation beyond this boundary, the assessment fails to acknowledge the true extent of potential impacts.

This approach results in a significant gap in the evaluation, as highly sensitive receptors beyond 20 kilometres receive no place-based assessment whatsoever. The consequence is that the lived experiences and environmental conditions of these distant communities are overlooked, undermining the integrity of the overall impact assessment. Such systematic underestimation raises concerns about the adequacy and completeness of the applicant's methodology in capturing the full scope of environmental effects.

1.1.626 Personal Observations

Finally, I would also ask the Scottish Ministers to consider: The proposed industrialisation of the wild lands and coast of Scotland would be an act of gross and irreparable destruction to our marine wildlife and vandalism to its ecosystem.

1.1.627 Summary

The proposal before the Scottish Ministers fails to demonstrate compliance with the relevant statutory and policy frameworks governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal region. However, published analyses of the applicant's documents reveal that these impacts have been materially underestimated. Crucially, the required heritage assessment has not been undertaken. Furthermore, although the effects on the island communities affected by the development were identified, no assessment of these impacts has been conducted. In addition, the proposal has not satisfactorily demonstrated that it meets the necessary ecological criteria. It is also important to note that only a portion of the project is currently subject to consideration by the Scottish Ministers.

Given these shortcomings, I respectfully urge that consent for the MachairWind Offshore Wind Farm be refused, alongside the associated marine licence. Should the Ministers be inclined to grant consent, I request that they require the submission of further environmental information and enhanced visualisations. Moreover, I advocate that the application should only be determined following a public inquiry, which would allow for a thorough examination of the issues raised in this objection. Regardless of the decision reached, I also request that the Scottish Ministers provide clear, reasoned conclusions addressing the effects on cultural heritage and on the island communities impacted by the proposal.

Yours faithfully,

[Redacted]

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

Member of the public 567
Dear Sir/Madam,

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

The following exposition outlines my objection grounded in planning and environmental considerations, framed within the statutory and policy parameters applicable to these applications. It is essential to emphasise that the onus lies firmly on the applicant to establish, through robust and sufficient evidence, that all relevant statutory tests and policy requirements are met. Objectors bear no obligation to demonstrate the contrary. Upon careful scrutiny, the evidence submitted fails to satisfy these statutory thresholds, thereby justifying refusal of consent. I request that this objection be formally registered and that I be kept informed of the determination of these applications.

1.1.628 Conflict with National Planning Framework 4 and the Development Plan

The applicant’s evidence acknowledges that, in relation to terrestrial development plan policies, including those set out in the Argyll and Bute Local Development Plan 2, the proposal would have significant adverse effects. Specifically, it would detrimentally impact the landscape, heritage assets, and community interests that these policies are designed to safeguard. This demonstrates a clear inconsistency with the relevant development plan framework. Furthermore, when considered alongside National Planning Framework 4 in its entirety, the proposal remains contrary to established planning objectives. The applicant has not provided sufficient justification to overcome these conflicts, and as such, the proposal cannot be regarded as compliant with the terrestrial development plan framework governing land-based effects.

1.1.629 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. Additionally, wireline drawings included within the same panoramic projections are subject to the same constraints as the accompanying photography. Rather than serving as an independent corrective, these wireline drawings represent a technical rendering embedded within the overall visualisation.

Consequently, the assessment based on these materials must be understood in the context of their technical and perceptual constraints. The inability of printed visuals to convey accurate scale and the dependency of wireline drawings on the underlying photography underscore that these visualisations provide an approximation rather than a definitive representation of the visual impact. This limitation should inform the weight attributed to the visual evidence when considering the proposal's effects on the surrounding environment.

While mitigation measures are often proposed to reduce the visual impact of offshore developments, in this instance the introduction of aviation and navigation lighting would mark a permanent and significant alteration to the night-time seascape. The existing horizon currently lacks any such lighting, and the proposed illumination would be visible throughout the stated 35-year operational life of the development. This change is not merely temporary; the presence of artificial lighting on the sea horizon would fundamentally transform the character of the seascape during nighttime hours, diminishing its natural qualities.

Moreover, the temporal limitation of 35 years does not mitigate the policy implications of this harm. Granting consent for the development effectively designates this seascape as appropriate for wind farm use, thereby endorsing a permanent shift in its character. Such a decision carries weight beyond the operational lifespan, as it signals acceptance of the seascape's alteration and the associated lighting effects. In light of these considerations, the impact on night-time seascape character and lighting should be regarded as a significant factor weighing against approval.

The proposal, as currently presented, fails to comply with key planning policies designed to safeguard nationally important landscape and seascape interests, resulting in significant practical consequences for the area's environmental integrity. This non-compliance undermines the purpose of these policies, which seek to manage and mitigate adverse effects on valued natural settings. Without adherence to these requirements, the proposal risks causing unacceptable harm to the character and quality of the landscape and seascape, contrary to the intentions of the planning framework.

The applicant's assessment has not satisfactorily demonstrated that its conclusions regarding the scale of the identified effects align with the methodology it employed. This inconsistency calls into question the reliability of the evaluation and the robustness of any mitigation measures proposed. As a result, there is insufficient evidence to confirm that the project respects the protections afforded by the National Planning Framework 4 (NPF4) Policies 4(c), 4(d), 11(d), and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively aim to ensure that development proposals do not compromise the integrity of nationally significant landscapes and seascapes.

Given these shortcomings, the proposal does not meet the established policy requirements intended to preserve the environmental and visual qualities of the area. To proceed without resolving these issues would be inconsistent with the planning framework's objectives and could set a concerning precedent for future developments in sensitive locations. Therefore, it is necessary for the proposal to be

reconsidered and revised to demonstrate full compliance with the relevant policies before any approval can be justified.

1.1.630 Cultural Landscape, Archaeology and Historic Environment

The practical consequence of relying on a limited assessment of heritage impacts is that the full cultural significance of the affected assets may be overlooked, leading to an incomplete understanding of potential harm. The applicant's baseline acknowledges that this significance arises from dynamic qualities such as pilgrimage routes, arrival by sea, and movement through a living cultural landscape. These aspects emphasize the relationships between monuments, spirituality, and the surrounding landscape and seascape, which are experienced sequentially rather than from static viewpoints.

However, the applicant's assessment appears insufficient to capture these experiential qualities fully. Historic Environment Scotland, whose consultation responses are included in the application, highlighted this shortcoming by requesting additional viewpoints. Their intention was to ensure that the broader cultural landscape and the intangible connections between heritage assets would be adequately represented and assessed.

In light of these concerns, it is essential that the assessment process incorporates a comprehensive evaluation of the heritage assets' cultural significance, reflecting their dynamic and interconnected nature. Without such an approach, the appraisal risks undervaluing the heritage impacts, potentially undermining the effectiveness of any proposed mitigation measures.

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

The application fails to provide the necessary assessment to demonstrate protection of internationally and nationally important heritage assets, as required by NPF4 Policy 7(h) on scheduled monuments and Policies 7(c) and 7(d) concerning their setting. This absence of evidence means the cultural significance of these assets and their surroundings cannot be assuredly preserved.

Furthermore, the proposal does not comply with the requirements set out in GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan, which collectively underscore the importance of safeguarding heritage within planning decisions. Without a robust demonstration of how these policies are met, there remains a substantial risk of harm to heritage assets.

In light of these shortcomings, the Scottish Ministers are deprived of the critical information necessary to conclude that the development would protect heritage assets appropriately. Consequently, the application should not be approved as it does not satisfy the essential policy safeguards for heritage protection.

1.1.631 Effects on Island Communities, Tourism and the Local Economy

There is considerable uncertainty regarding the potential impacts of the proposed development on the fundamental economic and social sustainability of the island communities in question. These communities exhibit an exceptional degree of dependence on visitors, whose presence is closely tied to the intrinsic qualities of the islands. The applicant's own baseline assessments identify these qualities as including landscape, seascape, cultural heritage, tranquillity and remoteness.

Any alteration to these defining characteristics poses a direct threat to the economic foundations of the island communities. Given that the visitors are drawn specifically by these attributes, changes affecting them could undermine the very reasons for tourism and visitation. This, in turn, risks destabilising the local economy which supports not only businesses but also essential services, infrastructure and employment opportunities within these communities.

The potential consequences extend beyond economic considerations to touch upon the social fabric and long-term viability of the islands' populations. If the qualities that attract visitors are compromised, there is a real danger that the communities' ability to sustain themselves will be jeopardised. It is therefore imperative to approach the proposal with caution, recognising the significant uncertainties surrounding its effects on the islands' unique and delicate balance.

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

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

The proposal falls short in meeting the required planning and statutory standards for assessing and protecting island communities, particularly when measured against

the obligations set out in GEN 19 and paragraph 4.81 of the National Marine Plan. These provisions mandate that decisions must be based on robust socio-economic evidence and adopt a precautionary approach where such evidence is insufficient. Furthermore, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 impose a clear duty to assess and give weight to the interests of island communities through meaningful engagement throughout the decision-making process. In contrast to these requirements, the applicant has failed to undertake the necessary detailed assessment to understand the specific effects of the proposal on island communities.

This deficiency is not a mere procedural oversight but a substantive failure to demonstrate compatibility with the sustainability of island communities or to discharge the statutory duties owed to them. The applicant's recognition that island communities require particular scrutiny is not matched by the evidence or engagement provided. Without the appropriate assessment and meaningful consultation from inception to conclusion, the proposal cannot be deemed compliant with the statutory and policy framework designed to safeguard island communities. Consequently, the application should be regarded as non-compliant with essential planning policies and statutory duties.

1.1.632 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, while the adjacent waters provide habitat for seabirds, marine mammals, and basking sharks. Introducing large-scale construction, operational, and decommissioning activities into this sensitive environment over several decades presents a substantial risk of significant adverse environmental effects.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically addressing the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are customarily prepared in circumstances where an adverse effect on the integrity of a protected site cannot be definitively ruled out. The very act of submitting these documents is a noteworthy element of the application. It indicates the applicant's recognition that, notwithstanding their own assessment, the Scottish Ministers might reach a different conclusion regarding the potential for adverse effects. Therefore, while these submissions demonstrate the applicant's intention to mitigate possible negative impacts through derogation and compensation measures, they also acknowledge uncertainty surrounding the assessment of harm to the protected site.

The legal framework governing developments that may affect protected habitats and species is clearly defined under the Habitats Regulations. These regulations stipulate that consent for such proposals can only be granted if the competent authority is satisfied that the development will not adversely affect the integrity of the protected site, unless the stringent derogation tests are met. Crucially, the law requires that consent may only be lawfully granted where no reasonable scientific doubt remains regarding the absence of adverse effects. This places a significant evidential burden on the applicant to demonstrate compliance. Importantly, mitigation measures, compensation proposals, and future monitoring cannot, in isolation, be relied upon to satisfy the statutory tests set out by the regulations.

This legal requirement is further reinforced by relevant planning policies, including GEN 9 and GEN 13 of the National Marine Plan, as well as specific policies within the Scottish Government's National Planning Framework 4 (NPF4), namely Policies 3, 4(b), 4(e), and 4(f). These policies collectively underpin the necessity for rigorous scientific evidence and a precautionary approach in decision-making relating to developments affecting protected natural environments. Their inclusion underscores the integrated approach between habitat protection legislation and marine spatial planning objectives, ensuring that environmental considerations are central to the assessment process.

Given the high standard of proof required by both law and policy, it is essential that any application seeking consent under these provisions presents robust, unequivocal scientific evidence demonstrating no likely adverse effect on the integrity of the site. Without this, the statutory tests are not met, and consent should not be granted. This framework serves to safeguard protected habitats effectively, ensuring that environmental protection is not compromised by uncertain or insufficient evidence. It is therefore appropriate that decision-makers apply these legal and policy requirements stringently in their assessments.

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

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

1.1.633 Cumulative and In-Combination Effects

The current approach to the project's assessment is fundamentally flawed, as only a portion of the development is presently before the Scottish Ministers. Critical components, specifically the export cable corridor and the onshore transmission works, which are indispensable for the wind farm's operation, have been deferred to subsequent applications. This fragmentation results in the effects of the entire project never being evaluated in a single, comprehensive process. Consequently, significant elements are subject to separate consenting procedures that follow the principal decision, undermining the integrity of the overall assessment.

Such an approach conflicts with established legal principles, notably those affirmed by the courts in Raeshaw Farms, which require that a project must be assessed in its entirety rather than segmented into smaller parts whose individual impacts might appear less significant. By effectively salami-slicing the project, the assessment fails

to capture the cumulative effects and interactions of all components, thereby compromising the robustness and completeness of the environmental and planning evaluation. This procedural deficiency raises serious concerns about the legality and adequacy of the decision-making process in this case.

The practical consequence of relying on the current cumulative impact assessment is a significant underestimation of the true combined effects of the proposed development alongside existing, consented, and foreseeable projects. This arises because the cumulative assessments are fundamentally dependent on the conclusions drawn in the broader Environmental Impact Assessment. Specifically, where the baseline assessments for landscape, heritage, and socio-economic factors have understated the severity of impacts—as previously demonstrated—the cumulative assessment inherits these understated effects. As a result, the baseline from which cumulative impacts are measured is artificially reduced, leading to a cumulative impact appraisal that fails to reflect the real magnitude of combined effects. Consequently, the cumulative impact assessment cannot be regarded as reliable or comprehensive in its current form.

The applicant has failed to demonstrate that the cumulative and in-combination effects of the proposal, including the deferred works, have been reliably identified and assessed, contrary to the requirements set out in GEN 21 and paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the Environmental Impact Assessment Regulations concerning project splitting. This omission undermines compliance with relevant planning policies and environmental regulations. Consequently, it is essential that the decision-making process expressly addresses the treatment of the deferred works to ensure a comprehensive and lawful assessment. Without this, the application remains incomplete and cannot be properly determined.

1.1.634 Public Engagement, Site Selection and Environmental Information

The consultation process surrounding this application has resulted in a practical consequence that undermines the legitimacy of the site-selection exercise itself. The applicant requests that Scottish Ministers accord significant weight to the site-selection process; however, the quality of public participation during both the plan and site-selection stages has been deficient and these shortcomings have persisted into the current application phase. The sheer volume of technical documentation, spanning many thousands of pages, presents an unreasonable burden on affected communities. Moreover, the consultation period coincided with the busiest months of the year for island residents, who are engaged intensively throughout the visitor season and have limited access to specialist advice during this time. In contrast, the applicant has benefited from years of preparation supported by substantial professional and financial resources, creating an imbalance that disadvantages public contributors.

This imbalance directly conflicts with the standards of effective public participation enshrined in GEN 18 of the National Marine Plan and the principles embodied in the Aarhus Convention. These frameworks require that individuals and communities affected by decisions of this magnitude have a realistic and meaningful opportunity to engage in the process. The conditions under which the island communities have

been expected to respond fall short of this required standard. Consequently, the consultation cannot be regarded as genuinely inclusive or adequate in facilitating informed public input. This failure to meet established participation principles diminishes the credibility and transparency of the decision-making process.

Accordingly, it is imperative that Scottish Ministers give careful consideration to these representational concerns when weighing the merits of the application. The deficiencies in public engagement not only diminish trust in the process but also raise serious questions about whether the application has been subject to sufficient scrutiny by those most directly affected. Upholding the standards of effective and equitable public participation is essential to ensuring that any decision taken is both legitimate and justifiable.

The Environmental Impact Assessment (EIA) submitted with this application serves as the primary evidential foundation for the Scottish Ministers' determination. However, the critical issue is not the volume or extent of the assessment but its sufficiency in addressing potential significant effects comprehensively. The application identifies various pathways to significant environmental impacts but subsequently fails to investigate them fully or applies methodologies that do not substantiate the conclusions reached. For example, the landscape assessment relies on outcomes derived from a distance pattern that is not supported by its stated methodology. Similarly, the heritage assessment lacks demonstration of applying its own integrity test, and the socio-economic assessment omits any place-based analysis of the affected islands. These shortcomings indicate that the environmental information presented is incomplete and insufficiently robust to support a fully informed decision.

Furthermore, the application places undue reliance on future assessments, post-consent plans, monitoring measures, and additional approvals to address outstanding concerns. Such reliance is inconsistent with the requirements of the EIA Regulations, which mandate that likely significant effects must be understood and evaluated prior to determination. The Scottish Ministers are obliged to make their decision based solely on the evidence currently before them, rather than on assumptions that unresolved matters will be satisfactorily addressed at a later stage. In this context, the applicant has not demonstrated that the environmental information submitted meets the necessary adequacy standards for a proper assessment. Consequently, the EIA as presented fails to provide the Scottish Ministers with a sufficiently comprehensive evidential basis to support the granting of consent.

1.1.635 Effects on Local Area

The practical consequence of the applicant's underassessment is that the direct and significant effects on the communities of Islay, Colonsay, and Oronsay have not been properly recognised or addressed. Despite Islay and Colonsay being the closest inhabited islands to the development area, which lies immediately north-west of Islay and west of Colonsay, the application evaluates Islay primarily as a potential project site rather than as a community affected by proximity. This omission fails to consider the Atlantic-facing communities on Islay whose daily environment and economy are intimately connected to the nearby 448 square kilometre development

area, leaving a critical gap in understanding the local impacts on their setting, economy, and social fabric.

For Colonsay and Oronsay, the situation is equally concerning. Their seaward outlook, which fundamentally shapes everyday life, directly faces the proposed development. The North Colonsay and Western Cliffs Special Protection Area, located on Colonsay's coastline, is central to the applicant's derogation case and compensation plan. This area represents the clearest recognition within the application that harm to the internationally protected seabird populations of these cliffs cannot be ruled out, yet the assessment does not adequately address the wider implications for the community and environment dependent on this designated site.

Further compounding the deficiencies in the heritage assessment is the presence of Oronsay Priory, a scheduled monument of national importance within this community's area. The assessment's identified gaps, particularly in relation to the treatment of the monument's open maritime setting, apply fully here and undermine confidence in the evaluation's reliability. Taken together, these shortcomings demonstrate a failure to comprehensively assess the environmental and heritage impacts on Islay, Colonsay, and Oronsay, thereby weakening the overall credibility of the application's impact evaluation.

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

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

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

Taken together, these factors demonstrate that the applicant's evaluation fails to adequately capture the scale and significance of the impacts on Iona, thereby compromising the integrity of the environmental and social impact assessment.

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

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

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

The applicant's assessment acknowledges the potential effects of the proposed development on designated landscapes within the wider seaboard area, including the Loch na Keal National Scenic Area and several National Scenic Areas (NSAs) at varying distances. Specifically, Ulva, situated within the Loch na Keal NSA, is noted as sharing the same effects on the designated landscape. Ulva is a community-owned island undergoing a process of regeneration, characterised by a small, re-establishing population whose recovery is intimately linked to the qualities of its setting and the unspoilt seascape that would be affected by the development. Notably, the applicant's assessment does not include any evaluation of impacts on this vulnerable island community, thereby omitting consideration of the potential

consequences for its natural and cultural qualities. Similarly, Staffa, another island within the same NSA and recognised as one of the most celebrated small islands in Europe, lies approximately 35 kilometres from the development area. This distance exceeds the approximate 30 kilometre threshold recommended by NatureScot for assessing effects on NSA qualities. Despite the applicant accepting the panoramic maritime qualities of Staffa, the conclusion reached is that the scale of change there would be small and the effect not significant.

Further afield, the applicant assesses the Jura National Scenic Area, located approximately 28 to 32 kilometres from the development, as having high sensitivity but assigns only a medium to low magnitude of impact. This moderation is explained by factors such as distance, apparent scale, and retention of landforms, even though the NSA's designation is fundamentally based on the wild, undeveloped character of its Atlantic outlook, which could be compromised. The Scarba, Lunga, and the Garvellachs National Scenic Area, at distances of roughly 35 to 40 kilometres, is treated in a similar manner within the assessment. Taken together, these approaches suggest an underestimation or omission of significant effects on important designated landscapes and vulnerable island communities. Such limitations in the applicant's assessment risk undermining the protection of the intrinsic natural and cultural qualities that these landscapes and communities possess, which warrants more comprehensive and careful consideration in the planning evaluation.

The 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 overlooked significant effects on mainland and island communities that have direct visual and economic connections to the seascape in question. Notably, Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by residents, faces the development area from the east. Despite the island's finely balanced community and economy, the assessment fails to examine the impacts on Gigha, thereby omitting consideration of a key receptor intimately linked to the seascape.

Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the sensitive receptors to which

the applicant’s distance-based mitigation approach is applied, raising concerns about the validity of this method. Additionally, the chain of communities along the west coast of Kintyre, whose character and visitor economy depend on open Atlantic seaboard views towards Islay, Jura, and surrounding waters, along with the Treshnish Isles and other small islands and mainland coasts overlooking the development site, have also been excluded from assessment. This omission undermines the comprehensiveness of the applicant’s evaluation and leaves unaddressed potential adverse effects on these interconnected communities.

The applicant’s environmental impact assessment systematically reduces the magnitude of change and discounts significant effects on highly sensitive receptors located beyond approximately 20 kilometres. This approach results in a quantified underestimation of the true impacts experienced by these receptors, as the assessment consistently moderates effects based solely on distance rather than on site-specific sensitivity or context.

This method fails to provide any place-based assessment for the communities living beyond this 20-kilometre threshold, despite the fact that these communities are demonstrably affected. By applying a blanket discounting of effects at this distance, the assessment overlooks meaningful environmental and social consequences, thereby undermining the integrity and comprehensiveness of the environmental evaluation process.

In conclusion, the reliance on a distance-based moderation and discounting framework leads to a significant gap in the assessment’s scope and accuracy. To ensure a robust and credible environmental impact assessment, it is essential that effects on sensitive receptors beyond 20 kilometres are fully recognised and appropriately evaluated, rather than systematically diminished or ignored.

1.1.636 Personal Observations

In addition to the planning matters above, I am personally concerned because: The islands in this area will be negatively affected by continued artificial components. Let nature be nature.

Based on my own local knowledge, I also wish to highlight that: When one species is affected… all are affected.

Finally, I would also ask the Scottish Ministers to consider: This is a sacred/religious/historic area that needs yo be protected from the creep of consumerism..

1.1.637 Summary

The proposal submitted by the applicant fails to satisfy the statutory and policy requirements governing its determination. Notably, the applicant’s own evaluation acknowledges significant impacts upon nationally designated landscapes, as well as the heritage and communities along the coastline. However, analyses of the applicant’s documents reveal that these impacts have been understated, and the essential heritage assessment has not been undertaken. Furthermore, while the

adverse effects on the island communities have been identified, they remain unassessed. The ecological obligations have not been demonstrated as achievable. Additionally, it is important to note that only a portion of the overall project is currently before the Scottish Ministers for consideration.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm proposal and to reject the corresponding marine licence application.

Should the Ministers decide against refusal, I request that they require the provision of further environmental information and enhanced visualisations. I also advocate that the applications be determined only following a public inquiry, thereby allowing a thorough examination of the issues raised in this objection. Regardless of the outcome, I further request that the Ministers explicitly address and state their conclusions on the impacts upon cultural heritage and the affected island communities within their decision rationale.

Yours faithfully,

[Redacted]

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

Member of the public 568
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, encompassed within application numbers 00012385 and 00012386, which seek consent under section 36 of the Electricity Act 1989 and a marine licence under Part 4 of the Marine (Scotland) Act 2010, respectively. I request that my objection be formally recorded and that I receive notification upon determination of these applications.

The development in question involves the construction of an offshore wind farm with a capacity of approximately 2 gigawatts. The project proposes installing between 91 and 144 turbines, each with a maximum height of up to 335 metres to blade tip. This installation would occupy a Windfarm Development Area spanning approximately 448 square kilometres of sea, situated to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona. The site lies in close proximity to the islands and coastal communities of the southern Hebrides.

My objection is grounded in planning and environmental considerations, which I will outline with reference to the statutory and policy framework applicable to these proposals. It is incumbent upon the applicant to satisfy the relevant legal and policy tests through comprehensive evidence. The onus does not fall on objectors to disprove the proposals. In this instance, the applicant has failed to meet that evidential burden. Consequently, I submit that the applications should be refused consent.

1.1.638 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989, which explicitly requires the applicant to have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, as well as protecting sites, buildings, and objects of architectural, historic, or archaeological interest. The evidence before the determining authority does not establish that the applicant has adequately addressed these requirements or taken reasonable steps to mitigate adverse effects on these protected interests. This omission is critical given the statutory mandate imposed both on the applicant and the Scottish Ministers in the determination process.

Furthermore, the absence of demonstrated compliance and the presence of deficiencies and omissions in the application constitute a direct conflict with the applicable legal and policy framework. As established in the evidence, such failures weigh decisively against the granting of consent. The application’s shortcomings in meeting these statutory duties undermine the legal basis for approval and must be regarded as a fundamental reason for refusal.

The marine licence application under consideration is subject to determination pursuant to Part 4 of the Marine (Scotland) Act 2010. As stipulated by the statutory framework, the decision-making process must accord with the provisions of Scotland’s National Marine Plan unless material considerations indicate otherwise. The National Marine Plan sets out a series of General Policies that are directly

relevant to this proposal, including but not limited to GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 addressing Natural Heritage, GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 alongside paragraph 4.85 regarding Cumulative Impacts. Compliance with these policies is an integral component of the statutory assessment process for the marine licence application.

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

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

The proposal fails to comply with key policies of National Planning Framework 4 (NPF4), specifically Policies 3, 4, 7, and 11, which address biodiversity, natural places, historic assets, and energy respectively. NPF4 is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. The application has not demonstrated compliance with these policies, and the evidence identifies deficiencies and omissions in relation to the protection and enhancement of biodiversity and natural places, as well as inadequate consideration of historic assets and energy requirements. These shortcomings represent a failure to meet the statutory and policy framework set out in NPF4.

Where compliance with NPF4 has not been demonstrated, or where evidence reveals conflicts with the applicable legal and policy framework, such matters weigh decisively against the granting of consent. In this case, the proposal’s failure to satisfy the requirements of Policies 3, 4, 7, and 11 constitutes a material conflict with NPF4. Consequently, the application should be refused on the basis that it does not accord with the national planning framework’s statutory and policy obligations.

The proposal fails to comply with the statutory requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which mandate that the likely significant

environmental effects of a development must be identified, assessed, and reported prior to any determination. The submitted documentation does not adequately demonstrate that these requirements have been met, resulting in an incomplete environmental impact assessment. This procedural deficiency undermines the decision-making process by leaving the determining authority without a full understanding of the potential environmental consequences of the proposal, contrary to the legal framework established to ensure informed and responsible planning decisions.

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

The applicant's submission does not demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be considered and given due weight in the decision-making process. This statutory obligation is clear and unambiguous, as set out in the Act itself and reiterated in the supporting evidence (S01). The proposal documentation fails to provide adequate evidence that these interests have been properly identified, assessed, or integrated into the planning considerations.

Furthermore, the absence of a thorough and transparent evaluation of the impacts on island communities constitutes a significant omission. The evidence confirms that where compliance with the Islands (Scotland) Act 2018 has not been demonstrated, or where deficiencies and omissions exist, these shortcomings must weigh against the granting of consent (S01). In this case, the lack of meaningful engagement with or consideration of island community interests represents a material failure in the planning process.

Given these deficiencies, the proposal conflicts with the applicable legal and policy framework established by the Islands (Scotland) Act 2018. The failure to properly consider and weigh the interests of island communities undermines the statutory purpose of the Act and the integrity of the decision-making process. Accordingly, this matter should be afforded significant weight in the determination of the application, and the proposal should not be granted consent on this basis.

The applicant has failed to discharge the fundamental responsibility to demonstrate compliance with all relevant legal and policy requirements. It is a well-established principle that the onus lies with the applicant to provide robust, objective, and proportionate evidence confirming that every applicable statutory duty, planning policy, and environmental assessment obligation has been fully satisfied. In this case, the submitted evidence does not meet this essential standard.

The absence of such demonstrable compliance is not a mere procedural oversight but a substantive deficiency that directly conflicts with the statutory and policy framework governing the determination of planning applications. Where the applicant has not shown, through adequate evidence, that these requirements have been met, the application remains fundamentally flawed. This failure to provide the necessary evidential assurance undermines the decision-making process and weighs decisively against the granting of consent.

Accordingly, given the applicant's failure to fulfill the evidential burden required to prove compliance with all relevant legal and policy frameworks, the application should be refused.

1.1.639 Conflict with National Planning Framework 4 and the Development Plan

NPF4 Policy 11 sets out a framework supporting renewable energy development, yet it does so explicitly through the application of impact criteria contained within the policy itself. Among these, Policy 11(c) addresses impacts on communities, while Policies 11(d) and 11(e) concern effects on landscape, seascape, and other receptors. It is therefore essential that any proposal aligns with these criteria to benefit from the policy's presumption in favour of renewable energy projects.

In the present case, the proposal fails to satisfy these impact criteria. It would result in significant adverse effects on nationally designated landscapes and seascapes, undermining the policy's protection for such valued environmental assets. Furthermore, the evidence submitted does not adequately demonstrate that the cultural significance of scheduled monuments and their settings would be preserved, nor does it show that island communities would be safeguarded from harm. Additionally, the ecological tests required by Policy 11 have not been proven capable of being met on the basis of the material provided. Consequently, the proposal conflicts with the impact criteria of NPF4 Policy 11, and as such, cannot be regarded as compliant with the policy's requirements.

When compared to the mitigation measures required under Policies 4(c), 4(d), 7, and 3 of the National Planning Framework 4, the proposal falls short of adequately protecting the nationally important assets designated for their landscape, heritage, and biodiversity value. Policy 11 is intended to work alongside these policies to ensure significant adverse effects on National Scenic Areas, scheduled monuments, and biodiversity are avoided or suitably mitigated. However, the evidence demonstrates that the proposal would cause significant adverse effects on these designated landscapes and seascapes, without sufficient measures to prevent or offset such harm.

Furthermore, the submission has not satisfactorily demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, nor that the interests of island communities would be safeguarded. The ecological requirements set out in Policy 3 remain unmet on the evidence provided. Taken together, these deficiencies establish clear conflict with the comprehensive suite of NPF4 policies designed to protect nationally important landscapes, heritage assets, and biodiversity. Consequently, the proposal cannot be considered compliant with the Framework's overarching aims for designated assets.

The applicant's evidence acknowledges that the proposal would adversely affect the landscape, heritage, and community interests safeguarded by the Argyll and Bute Local Development Plan 2, as well as other relevant terrestrial development policies. This demonstrates a clear conflict with the development plan framework insofar as it relates to land-based effects. Furthermore, the proposal is inconsistent with the National Planning Framework 4 when considered in its entirety, and the applicant has not provided sufficient justification to overcome this fundamental conflict. Consequently, the proposal fails to accord with the established terrestrial planning policies that protect the local environment and community interests.

1.1.640 Seascape, Landscape and Visual Effects

The applicant's assessment methodology lacks clarity and consistency regarding the distance thresholds beyond which major effects are deemed to cease. Notably, the written methodology provided in Appendix 16.1 fails to specify any such threshold. However, an independent Evidence Note, which draws exclusively on the applicant's Chapter 16 and Appendices 16.1 to 16.3, reveals a clear and consistent pattern across all three assessment streams: no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of that receptor's inherent sensitivity or the extent of visibility. This indicates an implicit, yet unacknowledged, reliance on distance as a controlling factor in determining the scale of impact.

Further examination of the applicant's documents confirms the influence of distance in shaping these assessments. For example, an evaluation of a coastal area located over 30 kilometres from the development site concludes that the scale of change is small, explicitly citing the viewing distance as the rationale. Moreover, the Landscape Character synthesis categorises the magnitude of impact as High within roughly 20 kilometres, Medium between about 20 and 30 kilometres, and Low beyond approximately 30 kilometres for certain landscape types. This systematic moderation of magnitude at the distances where the most sensitive designated landscapes are situated suggests that the protective tests are applied to understated inputs. Consequently, the conclusions drawn do not reliably reflect the true effects that the Scottish Ministers are being asked to consider and consent to.

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

Moreover, wireline drawings included within the same panoramic projections share these intrinsic limitations. Rather than serving as independent corrective tools, they are technical renderings embedded within the visualisation framework and thus subject to the same constraints as the accompanying photographic imagery. This means that although wirelines can assist in understanding the structural aspects of the proposal, they do not overcome the fundamental challenges of accurately conveying spatial relationships and scale.

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

The proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration of the night-time seascape character throughout the 35-year operational period. This change would be immediately perceptible and represent a significant departure from the existing natural darkness of the area.

Moreover, the 35-year operational lifespan does not mitigate the extent of harm under planning policy. Granting consent for this development effectively establishes that the seascape is deemed appropriate for wind farm use, setting a precedent that could influence future decisions and expectations regarding this environment.

Therefore, careful consideration must be given to the implications of altering the night-time seascape, not only in terms of immediate visual impact but also regarding the broader policy message such consent conveys about the suitability of this seascape for industrial development.

The applicant acknowledges that the proposed development would result in certain effects that engage specific policies within the planning framework, notably NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively serve to safeguard landscape and seascape interests of national significance, ensuring that developments do not cause unacceptable harm to these valued environments.

However, the applicant has failed to substantiate that its assessment of the scale of these effects aligns with the methodology it employs. There is a lack of clear demonstration that the proposal complies with the protective requirements set out for nationally important landscapes and seascapes. Consequently, the proposal does not meet the necessary standards established by the relevant policies, thereby calling into question its acceptability in planning terms.

1.1.641 Cultural Landscape, Archaeology and Historic Environment

The applicant’s assessment purports to follow Historic Environment Scotland’s established methodology for evaluating effects on the setting of historic assets, a framework developed and refined through consultation with Historic Environment Scotland itself. This methodology mandates a thorough evaluation not simply of visual change but of whether such changes affect the contribution that the setting makes to the cultural significance of heritage assets and whether the integrity of that setting is adequately retained. Importantly, it explicitly states that visual change alone should not be equated directly with adverse impact, requiring a nuanced and evidence-based assessment beyond mere description of visibility or prominence.

However, an independent Methodological Audit, prepared to support community objections and based solely on the applicant's Appendix 14.3, reveals a critical shortfall in the operational assessment. While the applicant's report identifies relevant heritage attributes and details aspects such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it fails to demonstrate how the integrity of the setting has been assessed in accordance with the applicant's own accepted methodology. The required evaluative step—assessing the effect of changes on the contribution of setting to cultural significance and concluding whether integrity is retained—is absent in all examined worked examples. This omission fundamentally undermines the reliability of the applicant's conclusions regarding heritage impacts and calls into question the robustness and compliance of the assessment process undertaken.

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.

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

Consequently, if the landscape assessment fails to fully capture the extent or severity of landscape impacts, the heritage conclusions derived from it are inherently compromised. This undermines the credibility of the heritage impact analysis and suggests that the overall assessment may not adequately reflect the true scale of harm to heritage assets. Such a foundational shortcoming calls into question the robustness of the conclusions relied upon in support of the proposed development.

The application engages NPF4 Policy 7(h) concerning scheduled monuments, alongside Policies 7(c) and 7(d) relating to the setting of heritage assets, as well as GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. These policies collectively establish a robust framework for the protection of cultural heritage, emphasising the need to safeguard the significance and context of internationally and nationally important heritage assets.

However, the applicant has not provided evidence demonstrating that the cultural significance of these heritage assets and their settings will be adequately protected. Crucially, the Scottish Ministers do not have before them the necessary assessment that would support such a conclusion. This omission indicates a failure to meet key policy requirements, thereby undermining the acceptability of the application in respect of heritage asset protection.

1.1.642 Effects on Island Communities, Tourism and the Local Economy

The proposal poses a direct threat to the economic foundation of the island communities, which rely heavily on visitors drawn to their unique landscape, seascape, cultural heritage, tranquillity, and remoteness. These qualities, as identified by the applicant's own baseline assessments, are precisely what attract tourism, the primary source of income for these communities.

Any alteration to these defining characteristics would undermine the visitor appeal, leading to a decline in tourism revenue. This reduction would not only affect local businesses but would also jeopardise essential services that depend on a stable population supported by a viable economy.

Ultimately, the loss of visitor-attracted qualities risks the social sustainability and long-term viability of the island communities. Protecting these intrinsic attributes is therefore fundamental to preserving both their economic health and community well-being.

While the applicant's socio-economic assessment addresses regional port communities in detail, it notably omits a place-based evaluation of the island communities directly affected by the proposal, despite their identification by the applicant's own consultants as potentially vulnerable through habitability impacts. The assessment's conclusion that these island communities exhibit low sensitivity to tourism effects rests on an examination conducted at a regional scale, rather than on an analysis tailored to the specific characteristics and conditions of the islands themselves. This approach overlooks the fact that small island economies are not simply regional averages; rather, they are often heavily reliant on sectors intricately linked to the attributes that attract visitors. Consequently, their economic reliance on increasing visitor numbers intensifies, rather than diminishes, their sensitivity to any changes affecting those qualities. Therefore, the conclusion of low sensitivity, reached without a dedicated, place-based assessment, cannot be considered evidence-based but must instead be regarded as an unsubstantiated assumption. This insufficiency in the assessment methodology undermines confidence in the applicant's understanding of potential impacts and the adequacy of proposed mitigation measures concerning the island communities.

There remains considerable uncertainty as to whether the proposal complies with the requisite planning and statutory standards concerning island communities. National policy, notably GEN 19 and paragraph 4.81 of the National Marine Plan, mandates that decisions must be grounded in robust socio-economic evidence and adopt a precautionary approach in cases where such evidence is lacking. Furthermore, NPF4 Policy 11(c) alongside the Islands (Scotland) Act 2018 impose a clear obligation to assess and give due weight to the interests of island communities

through meaningful engagement from the earliest stages to the final decision. The absence of comprehensive evidence undermines confidence in the proposal's compatibility with these policy requirements.

Critically, the applicant has acknowledged the need for particular scrutiny of island communities but has failed to undertake the necessary assessment to understand fully the effects upon them. There is no demonstration that the proposal supports sustainable island communities, nor that the statutory duties owed to these communities have been fulfilled. This failure to discharge statutory responsibilities in a meaningful manner is a material shortcoming that must weigh against the proposal's approval. Consequently, the proposal cannot be regarded as compliant with the established policy framework designed to protect and promote the interests of island communities.

1.1.643 Ecology, Biodiversity and Habitats Regulations

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

In considering the applicant's approach to addressing potential adverse effects on protected sites, it is notable that they have submitted both a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan. These documents specifically target the guillemot population within the North Colonsay and Western Cliffs Special Protection Area, reflecting a recognition that the proposed development may pose risks to this designated habitat. Such submissions are conventionally prepared in circumstances where it cannot be definitively ruled out that the integrity of a protected site may be compromised, indicating a precautionary stance on the part of the applicant.

The presence of these documents within the application package serves as a significant feature, underscoring the applicant's awareness of the complexities involved in securing consent where protected species and sites are concerned. Importantly, these plans are framed as "Without Prejudice," suggesting that the applicant does not concede an adverse effect but acknowledges the possibility that the Scottish Ministers might assess the situation differently. This cautious approach allows for the consideration of derogation provisions under relevant conservation legislation, which permit certain actions that might otherwise be prohibited, provided that appropriate compensation measures are implemented to offset any harm.

While the submission of derogation and compensation plans demonstrates a proactive attempt to mitigate potential impacts, it also raises questions about the certainty of the applicant's conclusions regarding adverse effects. The reliance on such documents reflects an understanding that the planning authority may not

concur with the applicant's assessment of no significant harm. Consequently, these submissions should be carefully scrutinised to ensure that any proposed compensation is adequate, enforceable, and capable of maintaining the overall integrity of the protected area. It remains essential that the planning decision fully weighs these considerations in determining whether the application can be granted without undermining the conservation objectives of the site.

In considering developments affecting protected habitats, it is important to recognise that mitigation measures, compensation proposals, and future monitoring alone are insufficient to satisfy the legal requirements under the Habitats Regulations. While such measures may form part of the overall assessment, they do not in themselves eliminate reasonable scientific doubt regarding potential adverse effects on site integrity. Consequently, consent may only be lawfully granted where the competent authority has ascertained, beyond reasonable scientific doubt, that the proposal will not adversely affect the integrity of the protected site or where the strict derogation tests have been met.

This stringent evidential standard places the burden of proof squarely on the applicant, who must provide clear and convincing evidence that the statutory tests are satisfied. The legal framework governing this process is supported by several policy instruments, including GEN 9 and GEN 13 of the National Marine Plan as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). These policies collectively reinforce the imperative to protect designated habitats and species by ensuring that development consent is not granted unless the highest standards of environmental protection are demonstrably upheld.

Accordingly, the decision-making process must be rigorous and precautionary, reflecting the high threshold established by law and policy. It is therefore essential that proposals are accompanied by robust, scientifically sound evidence that fully addresses potential impacts, rather than relying primarily on mitigation or compensatory measures. Only by meeting this exacting standard can the integrity of protected sites be safeguarded in accordance with the Habitats Regulations and relevant planning policies.

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

1.1.644 Cumulative and In-Combination Effects

The current proposal before the Scottish Ministers comprises only a portion of the overall project, notably excluding the export cable corridor and the onshore transmission works, both essential for the wind farm's operation. By deferring these critical components to subsequent applications, the cumulative effects of the entire development are never assessed together. This fragmentation leads to an incomplete evaluation of the project's full environmental and operational impacts at the principal decision-making stage.

Such an approach conflicts with established legal principles, as reinforced by the courts in Raeshaw Farms, which mandate that a project must be considered in its entirety rather than being artificially divided into smaller segments whose individual impacts appear diminished. Assessing only parts of the project undermines the integrity of the planning process and risks overlooking significant cumulative effects, thereby rendering the current assessment legally and procedurally flawed.

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

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

1.1.645 Public Engagement, Site Selection and Environmental Information

When comparing the consultation process for this application with the standards set out in GEN 18 of the National Marine Plan and the principles of effective public participation enshrined in the Aarhus Convention, it is clear that the affected communities have not been afforded a realistic opportunity to engage meaningfully. The applicant’s request that Scottish Ministers place significant weight on the site-selection process makes the quality of public participation at that stage, as well as during the application phase, directly relevant. However, these stages have been marked by persistent deficiencies. Notably, the application itself consists of many thousands of pages of complex technical material, yet the consultation period has coincided with the busiest months of the year for island communities. This timing is particularly problematic because residents are occupied with continuous work throughout the visitor season, and specialist advice is correspondingly less

accessible. In contrast, the applicant has had years to prepare its case and has had substantial professional and financial resources at its disposal.

These circumstances fall short of the standards required to ensure effective public participation in decisions of such magnitude. The conditions under which local communities have been expected to respond have not been conducive to informed and meaningful engagement. This imbalance undermines the legitimacy of the site-selection process and the consultation as a whole. It is essential that Scottish Ministers bear this firmly in mind when considering the representations made, recognising that the deficiencies in consultation timing and public participation materially affect the robustness of the decision-making process.

There remains significant uncertainty as to whether the Environmental Impact Assessment (EIA) submitted is sufficient to enable the Scottish Ministers to make a fully informed decision on this application. While the EIA is extensive in scope, it falls short in critical respects. Across multiple topics, the assessment identifies potential pathways to significant effects but either fails to investigate them comprehensively or employs methodologies that do not substantiate its conclusions. For example, the landscape assessment produces outcomes based on a distance pattern that is not supported by its own stated methodology; the heritage assessment lacks clear demonstration of applying its integrity test; and the socio-economic assessment omits any place-based analysis of the islands directly affected. Moreover, the applicant frequently defers key matters to future stages—relying on post-consent plans, monitoring, and additional approvals—which does not satisfy the EIA Regulations' requirement that likely significant effects must be understood prior to determination. Ultimately, the Scottish Ministers are obliged to decide on the evidence currently before them, not on assumptions that outstanding issues will be resolved later. In this regard, the applicant has not demonstrated that the environmental information provided is adequate for the purpose of making a sound and lawful decision.

1.1.646 Effects on Local Area

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

collectively undermine the reliability and completeness of the environmental and heritage impact evaluation.

The applicant's Coastal Character assessment recognises that the Sound of Iona possesses a high sensitivity to the proposed development, noting its direct orientation towards the site and extensive visibility. The assessment identifies a large geographical extent of change, with effects considered moderate and significant across approximately 21 kilometres. The turbines would span around 39 degrees of the horizon, impacting the ferry crossing between Fionnphort and Iona. Similarly, the west coast of Iona is deemed highly sensitive, with widespread visibility and acknowledged significant effects on residents and visitors throughout much of the island, including at Dùn Ì, the island's highest point.

Iona's monastic landscape, comprising the Abbey, the Nunnery and the high crosses, holds heritage significance of international importance. The applicant's baseline recognises that this significance is intrinsically linked to pilgrimage, arrival by sea, and movement through the landscape. Historic Environment Scotland's request for additional viewpoints, including from the ferry crossing itself, was not fully addressed, as no visualisation was provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn. This omission raises concerns about the completeness of the visual impact assessment on such a culturally sensitive and historically important landscape.

Community response on Iona further underlines the potential for significant adverse effects. A household consultation revealed that 92 per cent of respondents object to the proposal. Moreover, the applicant's own consultants identified habitability as a potential pathway of effect on the community, yet this was never formally assessed. To illustrate the scale of visual impact, the largest turbines would exceed the height of Ben Hynish on Tiree—at 141 metres and visible from Iona at around 33 kilometres—by approximately 194 metres, despite being situated at roughly two-thirds of that distance. Taken together, these factors suggest that the applicant's assessment may underestimate the true scale and significance of visual, community, and heritage impacts on Iona, thereby compromising the accuracy of the environmental and social impact evaluation.

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

Extending across Mull, the applicant also accepts significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, encompassing the island's western waters and islands, is

consistently assessed as having High sensitivity at viewing distances ranging from approximately 21 to 33 kilometres. However, the applicant attributes no more than a Medium magnitude to the impacts here, which may understate the true significance given the area's national scenic importance.

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

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

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

The applicant's assessment of the potential effects on designated landscapes and island communities appears to underestimate the scale and significance of those effects, particularly when compared with the mitigation measures proposed. For example, while the assessment acknowledges the panoramic maritime qualities of Staffa within the Loch na Keal National Scenic Area, it concludes that the scale of change there would be small and the effect not significant, despite the island's status as one of the most celebrated small islands in Europe and its location approximately 35 kilometres from the development area. This conclusion sits uneasily with NatureScot's guidance to assess effects up to 30 kilometres, suggesting that important visual and experiential qualities may not have been fully accounted for.

Further concerns arise in relation to Ulva, also within the Loch na Keal National Scenic Area, which supports a small, re-establishing, community-owned population whose recovery depends heavily on the unspoilt seascape and setting threatened by the development. The absence of any specific assessment of effects on Ulva undermines confidence that the unique cultural and natural qualities vital to this vulnerable community have been adequately considered. Similarly, the Jura National Scenic Area, assessed at a distance of approximately 28 to 32 kilometres, is attributed a High sensitivity due to its wild and undeveloped Atlantic outlook, yet the applicant assigns only a Medium to Low magnitude of impact, citing distance and

retained landforms as mitigating factors. This approach risks undervaluing the fundamental qualities upon which the designation is based.

The Scarba, Lunga and the Garvellachs National Scenic Area, situated roughly 35 to 40 kilometres from the development, receives an equivalent treatment, with limited recognition of potential adverse effects. Collectively, these assessments suggest a pattern of insufficient weighting given to the intrinsic wildness and cultural significance of these landscapes and island communities. To ensure the protection of their natural and cultural qualities, a more rigorous and comprehensive evaluation of impacts, including those on vulnerable island populations, is necessary. Without this, the planning balance remains uncertain, and the effectiveness of proposed mitigation measures is open to question.

The applicant's assessment categorises the South Tiree coastal area as having High sensitivity at an approximate distance of 35 kilometres, yet concludes a Low magnitude of change resulting from the proposed development. This juxtaposition of high sensitivity with low impact magnitude appears incongruous, particularly given the distinctive environmental context of Tiree. The island's exceptional low-lying topography, with its highest elevation at Ben Hynish reaching only 141 metres, underpins a landscape character dominated by expansive sea and sky. Such a setting is inherently sensitive to vertical intrusions.

Given that the proposed turbines would reach heights of up to 335 metres, more than twice the island's highest natural point, their introduction would constitute a profound alteration to Tiree's open oceanic horizon. This scale of vertical structure is without precedent in the seascape and, accordingly, the applicant's conclusion of a Low magnitude of change does not adequately capture the likely visual and experiential impacts. The assessment thus significantly understates the magnitude of change and impact on Tiree's sensitive and distinctive landscape character, leading to an unreliable evaluation of effects.

The applicant's assessment has not addressed significant effects on several mainland and island communities that have direct views of the proposed development and whose local economies depend on the seascape in question. For example, Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by residents, faces the development site from the east. Despite its finely balanced community and economy, the potential impacts on Gigha have not been examined. Similarly, Ardnamurchan Point, the westernmost point of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas represent precisely the receptors for which the applicant's distance-based moderation approach is applied, raising concerns that the visual and economic effects here have been underestimated. Furthermore, the west coast of Kintyre encompasses a series of communities whose outlook, character and visitor economy are intrinsically linked to the open Atlantic seaboard facing Islay, Jura and the surrounding waters. The Treshnish Isles and other small islands and mainland coasts with views towards the development area similarly share this position and have not been adequately considered. Collectively, these omissions compromise the comprehensiveness of the applicant's assessment by failing to fully evaluate the

potential impacts on communities that are both visually and economically connected to the seascape in question.

The applicant's reliance on a distance-based approach to assessing environmental effects results in a systematic underestimation of impacts on sensitive receptors located beyond 20 kilometres. This method moderates the magnitude of change and discounts the significance of effects simply due to their distance from the project, leading to a practical consequence whereby substantial adverse impacts are effectively overlooked. Such an approach fails to provide a robust or accurate appraisal of the true extent of harm experienced by distant communities.

Critically, this approach means that communities beyond the 20-kilometre threshold have not been subject to any place-based assessment, despite potentially experiencing significant effects. The absence of site-specific evaluation undermines the integrity of the environmental impact assessment and disregards the lived experience of these populations. Without a thorough, locally grounded analysis, the assessment cannot be relied upon to inform decision-making adequately or to protect the interests of all affected parties.

Therefore, it is essential that the assessment methodology be revised to recognise and properly evaluate the effects on sensitive receptors regardless of distance. Only through a more comprehensive and nuanced approach can the environmental impact assessment fulfil its purpose of accurately identifying and mitigating harm, thereby ensuring a fair and transparent planning process.

1.1.647 Personal Observations

In addition to the planning matters above, I am personally concerned because: The proposal could affect me, my family and my local community through changes to the character of the coastline and seascape, particularly if the turbines and associated infrastructure are visible from land. Scotland's seascapes are an important part of local identity, recreation, tourism and quality of life, and the Scottish Government recognizes that offshore wind development can affect visual amenity and coastal character.

I would also be concerned about potential effects on marine wildlife, birds, marine mammals, fisheries and other activities that depend on the sea. The MachairWind project's own scoping material identifies marine ecology, ornithology, marine mammals, commercial fisheries, archaeology, socio-economics and seascape/landscape impacts as matters requiring assessment.

I believe the proposed MachairWind Offshore Wind Farm could have a serious and potentially destructive impact on the marine ecosystem and, consequently, on the communities and livelihoods that depend upon it.

My main concern is the scale of disturbance that would be caused to the seabed and surrounding marine environment during construction, followed by the long-term presence and operation of the development. The marine environment is an interconnected ecosystem, and disruption to seabed habitats, fish and shellfish populations, marine mammals and seabirds could have consequences that extend

well beyond the immediate footprint of the development. MachairWind’s own assessment recognises the need to consider impacts on benthic ecology, fish and shellfish, marine mammals and offshore ornithology.

I am particularly concerned that damage to habitats and disruption to species could affect the wider food chain and the ecological health of the area. Construction activities can disturb seabed sediments, and the project's documentation acknowledges potential changes to water quality and impacts on marine mammals and their prey during construction.

These impacts could ultimately affect local people through consequences for fishing, tourism, recreation, the character of coastal communities and the wider natural environment on which people depend. Once damage has occurred to sensitive marine habitats or wildlife populations, it may not be possible to fully restore them. Please do not do this!

I therefore believe the potential environmental consequences must be treated with the utmost caution. The need for renewable energy should not be used to justify unacceptable or irreversible damage to Scotland's marine ecosystems. I would ask that the cumulative and long-term ecological effects of MachairWind are fully considered and that the proposal is refused if the evidence cannot demonstrate that the marine environment and the communities dependent upon it can be adequately protected.

Based on my own local knowledge, I also wish to highlight that: Yes. I would particularly want the following features to receive greater consideration:
- The marine ecosystem and seabed habitats, including the potential cumulative effects on benthic habitats, fish and shellfish and the wider food web. The project’s own assessment recognizes that changes to prey species and habitat can have consequences for seabirds.
- Seabirds and marine mammals, particularly important breeding, feeding and migratory areas. The scale of the development means impacts should be considered across the wider ecosystem, not simply within the immediate turbine footprint.
- The wild and undeveloped character of the west coast and surrounding islands. These seascapes are highly valued for their tranquillity, natural beauty, tourism and sense of place. Scottish Government guidance recognises seascapes as an important shared resource and identifies offshore wind as a potential source of landscape and visual effects.
- Local coastal communities, fishing and tourism, whose livelihoods and identity are closely connected to the sea. These impacts should be assessed cumulatively rather than treating each effect in isolation.
Historic and cultural heritage, including the possibility of impacts on marine archaeology and the setting of important coastal and island heritage.

Most importantly, I believe the cumulative and potentially irreversible effects on the whole marine ecosystem deserve much greater weight. NatureScot itself acknowledges that offshore wind and associated infrastructure can affect birds, marine mammals, seabed ecology, fish, seascapes and visual amenity.

Finally, I would also ask the Scottish Ministers to consider: I believe this proposal could affect me and my family by changing our expenses, access to services, and overall quality of life. It could also have a broader impact on my local community by affecting jobs, housing, transportation, safety, or the availability of community resources. Moreover, I think it is important to consider any potential negative effects and make sure that the people most affected have a voice in the decision-making process.

I would ask the Scottish Ministers to take a precautionary approach and give substantially greater weight to the long-term and cumulative environmental consequences of MachairWind, rather than considering each impact separately. Please do not do this to the beautiful land of Scotland.

1.1.648 Further Comments

I would add that this is not simply a question of whether individual impacts can be mitigated. The scale of the development and its cumulative effects need to be considered in the context of the entire marine ecosystem and the other pressures already affecting it. There is major concerns around disturbance to fish and shellfish, foundation works, noise and vibration, and impacts on sensitive seabed habitat.

1.1.649 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy requirements governing its determination. The applicant’s own evaluations acknowledge significant impacts on nationally designated landscapes, as well as on the coastal communities and their heritage. However, published analyses of the applicant’s documentation reveal that these impacts have been understated. Crucially, the necessary heritage assessment has not been completed, while the effects on the island communities directly affected were identified but never subject to proper evaluation. Furthermore, the ecological criteria required by law have not been demonstrated as achievable. It is also notable that only a portion of the project is currently before the Scottish Ministers for approval.

Given these substantial shortcomings, I urge the Scottish Ministers to refuse both consent for the MachairWind Offshore Wind Farm and the associated marine licence. Should the Ministers consider otherwise, I request that they require the submission of additional environmental information and enhanced visualisations to address the deficiencies identified. Moreover, I propose that the applications be determined only following a public inquiry, which would allow for thorough examination of the issues raised in this objection.

Finally, irrespective of the decision reached, I ask the Ministers to provide clear and explicit conclusions in their reasons regarding the effects on cultural heritage and the impacted island communities. This transparency is essential to ensure that these critical considerations are properly acknowledged in the final determination.

Yours faithfully,

[Redacted]

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

Member of the public 569
Dear Sir/Madam,

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

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

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

1.1.650 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989, which require the applicant to have regard to the desirability of preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant is obliged to take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The Scottish Ministers, in determining this application, are similarly required to have regard to these statutory duties.

The evidence before the determining authority does not establish that these requirements have been adequately addressed. There are clear deficiencies and omissions in the application’s consideration of these statutory duties, and no satisfactory demonstration that reasonable mitigation measures have been identified or proposed to address potential adverse effects on the protected interests. This lack of compliance with the statutory framework is a fundamental failing.

Given these unresolved uncertainties and the failure to meet the statutory obligations under Schedule 9 of the Electricity Act 1989, the application should be refused consent. Where compliance has not been demonstrated, and where evidence

identifies such deficiencies and conflicts with the applicable legal and policy framework, these matters weigh decisively against granting consent.

The proposal fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be properly considered and given due weight in the decision-making process. This statutory obligation is clear and unambiguous, yet the submitted documentation does not provide adequate evidence that these interests have been sufficiently identified, assessed, or integrated into the planning evaluation. The absence of such consideration represents a significant procedural deficiency.

Moreover, the evidence before the determining authority reveals omissions and shortcomings in addressing the specific needs and circumstances of island communities as required by the Act. These deficiencies undermine the integrity of the decision-making process and conflict with the applicable legal and policy framework. Where compliance with the Islands (Scotland) Act 2018 has not been demonstrated, the legislation explicitly directs that such failures must weigh against the granting of consent.

In light of these factors, the proposal cannot be regarded as meeting the statutory tests set out by the Islands (Scotland) Act 2018. The failure to properly consider and give due weight to the interests of island communities constitutes a material flaw that should result in the refusal of planning permission. The decision-making process must uphold the legal protections afforded to island communities, which this proposal does not satisfy.

The applicant is required to demonstrate, by means of robust, objective, and proportionate evidence, that all relevant statutory duties, planning policies, and environmental assessment requirements have been fully satisfied. This evidential burden is fundamental to the proper determination of the application and rests squarely with the applicant.

In the present case, the applicant has failed to discharge this responsibility. The submitted evidence does not establish compliance with every applicable legal and policy framework. There are clear deficiencies and omissions within the documentation provided, and no conclusive demonstration that all statutory duties and planning policies have been met. Furthermore, the evidence reveals conflicts with the relevant legal and policy requirements, which remain unaddressed.

Given these shortcomings, the application does not meet the necessary evidential standard required for lawful and policy-compliant development. As established, where compliance has not been demonstrated, or where evidence identifies such deficiencies and conflicts, these matters must weigh decisively against the granting of consent. Therefore, on the basis of the applicant’s failure to provide adequate and conclusive evidence of compliance, the application should be refused.

1.1.651 Seascape, Landscape and Visual Effects

The applicant’s assessment methodology fails to establish a clear distance threshold beyond which major effects cease, yet empirical analysis reveals a consistent

pattern: no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of its intrinsic sensitivity or the extent of visibility. This finding emerges from a comprehensive review of the applicant's Chapter 16 and Appendices 16.1 to 16.3, underscoring a systematic limitation in the evaluation approach that directly influences the classification of potential impacts.

Further examination of the applicant's documentation corroborates the significant role that distance plays in these judgements. For example, an assessment of a coastal area located over 30 kilometres away concludes that, due to the viewing distance, the scale of change is judged to be small. Similarly, the Landscape Character synthesis delineates a gradation of impact magnitude, with High magnitude effects confined to within approximately 20 kilometres, Medium effects occurring between 20 and 30 kilometres, and Low effects beyond 30 kilometres for certain landscape types. This systematic moderation of magnitude at precisely the distances where the most sensitive designated landscapes lie results in protective tests being applied to understated inputs. Consequently, the conclusions drawn from the assessment do not reliably represent the true effects that Scottish Ministers are being asked to consent to.

While the visualisation materials submitted in support of the application follow NatureScot's established guidance, it is important to recognise their inherent limitations when compared to the actual experience of mitigation on site. Printed visualisations, including the wireline drawings incorporated within panoramic projections, are unable to replicate fully the scale and spatial relationships perceived by a viewer in the field. These technical renderings, rather than serving as independent corrections, function as components within the overall visualisation and therefore share its constraints in conveying an accurate sense of presence and impact.

This acknowledgement of technical and perceptual limitations suggests that reliance on such visual evidence alone may underrepresent the true extent of visual effects experienced locally. Consequently, a cautious approach is necessary when interpreting these materials, ensuring that any mitigation measures are evaluated not only through the lens of these visualisations but also through on-site assessments and other complementary forms of evidence. This balanced consideration will support a more robust understanding of the development's visual impact and the effectiveness of proposed mitigation.

The applicant's evidence acknowledges that the proposed development will introduce aviation and navigation lighting to a sea horizon that is currently unlit, thereby permanently altering the character of the night-time seascape throughout its operational life of 35 years. This change represents a significant visual impact, as the existing natural darkness will be replaced by artificial illumination, fundamentally transforming the nocturnal environment of the seascape.

Furthermore, the temporal limitation of 35 years does not diminish the policy implications of such harm. Consent for this development effectively constitutes a determination that the seascape is appropriate for wind farm use, thereby establishing a precedent for the acceptability of such character alterations within this

marine setting. This has enduring consequences for the protection of seascape character and must be carefully weighed in the decision-making process.

The applicant's submission fails to adequately demonstrate that proposed mitigation measures effectively address the identified effects on landscape and seascape interests. While certain impacts are acknowledged, the application does not provide sufficient evidence that these effects have been mitigated to a degree that would satisfy the requirements set out in the relevant policies. In particular, the assessment lacks clarity on how the scale of these effects aligns with the methodology employed, undermining confidence in the conclusions presented.

These shortcomings result in non-compliance with key planning policies designed to safeguard nationally important landscapes and seascapes. Specifically, the proposal does not meet the requirements of NPF4 Policies 4(c) and 4(d), Policies 11(d) and 11(e), GEN 7, nor paragraph 4.28 of the National Marine Plan, as identified in the submitted evidence. Without clear demonstration of consistency and adherence to these policies, the proposal cannot be considered acceptable in its current form.

1.1.652 Cultural Landscape, Archaeology and Historic Environment

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

The practical consequence of the applicant's current approach is that the full cultural significance of the affected heritage assets may not be adequately understood or protected. The baseline information provided acknowledges that this significance is deeply rooted in experiential qualities such as pilgrimage routes, arrival by sea, and movement through a living cultural landscape. These attributes emphasise the dynamic relationships between monuments, spirituality, and their surrounding landscape and seascape, which are experienced in motion rather than from static viewpoints. If the assessment fails to capture these broader cultural and experiential dimensions, it risks underestimating the true impact of the proposed development on heritage values.

Further reinforcing this concern, Historic Environment Scotland's consultation responses—recorded within the application itself—have specifically requested additional viewpoints to ensure these wider qualities are properly represented in the assessment. This highlights a recognised need for a more comprehensive evaluation

that accounts for the intangible and interconnected aspects of the heritage assets. Without addressing this, the applicant's assessment may not meet the necessary standards for understanding and mitigating harm to the cultural landscape, potentially leading to adverse effects that are insufficiently identified or managed. It is therefore essential that these broader experiential qualities form an integral part of any heritage impact appraisal.

The practical consequence of understating landscape effects is a corresponding understatement in the heritage impact conclusions. Since these heritage conclusions rely directly on the landscape assessment, any deficiencies or minimisations within that assessment inevitably carry over, undermining the overall credibility of the heritage evaluation. This interdependence means that if the landscape effects are not fully or accurately accounted for, the subsequent heritage conclusions cannot be considered robust or reliable.

The practical consequence of the application's failure to adequately address heritage considerations is that it does not comply with essential policy requirements designed to safeguard important cultural assets. This deficiency directly undermines the acceptability of the proposal, as it leaves unresolved the potential harm to heritage sites of international and national significance. Without clear evidence that the cultural significance and settings of these assets will be protected, the proposal cannot be deemed consistent with the necessary standards for heritage conservation.

This issue engages several specific policies within the National Planning Framework 4 (NPF4), notably Policy 7(h) concerning scheduled monuments, as well as Policies 7(c) and 7(d) which address the setting of heritage assets. Additionally, the application must be considered in light of Policy GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan, all of which collectively establish a robust framework for protecting heritage in the planning process. The applicant's submission, however, fails to provide the required assessments or evidence demonstrating compliance with these policies.

Crucially, the Scottish Ministers are not presented with the necessary information to conclude that the cultural significance of these heritage assets and their settings would be preserved. This absence of a comprehensive assessment means the proposal does not meet the policy tests for heritage protection, thereby impeding the decision-making authority's ability to approve the application confidently. On this basis, the application falls short of meeting the statutory and policy obligations, leading to the conclusion that it should not be supported in its current form.

1.1.653 Effects on Island Communities, Tourism and the Local Economy

The applicant's own baseline assessments acknowledge that the island communities affected by this proposal rely exceptionally heavily on visitors who are drawn specifically by the qualities identified: landscape, seascape, cultural heritage, tranquillity and remoteness. These attributes are not incidental but form the core attraction sustaining the local visitor economy. The proposed development threatens to alter these very qualities, thereby undermining the fundamental reasons why visitors choose to come.

Any diminution of these key characteristics would have a direct and adverse impact on the economic foundations of these communities. This, in turn, would jeopardise the provision of local services, reduce population stability, and ultimately threaten the long-term social and economic viability of the islands. The proposal therefore poses a significant risk to the continued sustainability of these communities by damaging the essential qualities upon which they depend.

The failure to assess the habitability of the affected island communities has practical consequences for understanding the proposal's full socio-economic impact. Although the applicant's consultants acknowledged habitability as a potentially significant pathway for effects on island communities, no specific place-based assessment was undertaken. Instead, the socio-economic evaluation in Chapter 18 focuses on regional-level analysis, emphasizing port communities while neglecting equivalent scrutiny of the islands directly facing the development. Despite this omission, the assessment concludes that these island communities have low sensitivity to tourism effects, a finding that lacks evidential support. Small island economies differ markedly from regional averages, as they are heavily reliant on sectors most vulnerable to changes in the qualities attracting visitors. This reliance does not lessen their sensitivity but rather increases their dependence on those at-risk attributes. Therefore, the conclusion of low sensitivity, reached without detailed, place-specific analysis, amounts to an assumption rather than a demonstrated fact. Such an approach undermines confidence in the adequacy of the socio-economic assessment to identify or mitigate potential adverse impacts on island communities.

The proposal fails to meet the required planning and statutory standards concerning the assessment and protection of island communities. Under GEN 19 and paragraph 4.81 of the National Marine Plan, decisions must be founded on robust socio-economic evidence, adopting a precautionary approach where such evidence is insufficient. This requirement is reinforced by National Planning Framework 4 (NPF4) Policy 11(c) and the Islands (Scotland) Act 2018, which collectively mandate that the interests of island communities be thoroughly evaluated and afforded appropriate weight through meaningful engagement from the earliest stages of development to its conclusion. The absence of such comprehensive assessment and engagement in this case is a fundamental shortcoming.

Moreover, the applicant acknowledged that island communities warrant particular scrutiny but failed to undertake the necessary assessment to understand the proposal's effects on them. There is no demonstrated compatibility with the principles of sustainable island communities, nor is there evidence that the statutory duties owed to these communities have been fulfilled. This lack of due diligence undermines confidence in the proposal's compliance with relevant policies and legislation, rendering the application deficient in meeting the planning system's requirements to safeguard island communities effectively.

1.1.654 Ecology, Biodiversity and Habitats Regulations

The development site encompasses Priority Marine Features and Annex I habitats directly within its boundaries, while the adjacent waters serve as habitat for seabirds, marine mammals, and basking sharks. The proposed project would introduce extensive construction, operational, and decommissioning activities into this

ecologically sensitive environment over a period of several decades, representing a substantial and prolonged disturbance.

Given the presence of these designated habitats and protected species, the scale and duration of the development's impact warrant thorough consideration. The potential for significant adverse environmental effects arises from the disturbance, habitat loss, and cumulative pressures associated with the proposed activities. This underscores the need for rigorous assessment and mitigation to address the ecological importance and vulnerability of the site and its surrounding marine environment.

The applicant's submission includes both a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan specifically addressing the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are typically prepared in instances where adverse effects on the integrity of a protected site cannot be definitively ruled out. Their presence within the application therefore signifies a recognition by the applicant of potential harmful impacts on this designated area. Importantly, the submission of such documents indicates that the applicant acknowledges the possibility that Scottish Ministers may ultimately reach a different conclusion regarding the likelihood or extent of adverse effects than the applicant's own assessment suggests. In essence, while the applicant proposes measures intended to mitigate and compensate for any potential harm, the existence of these documents highlights an underlying uncertainty about whether such adverse effects can be fully avoided. Consequently, the application must be considered in light of this acknowledgment, with careful scrutiny given to the adequacy of the proposed compensation measures should derogation be deemed necessary.

Mitigation, compensation proposals, and future monitoring measures, while important components of development planning, do not alone satisfy the stringent statutory tests required under the Habitats Regulations. The competent authority must be assured beyond reasonable scientific doubt that the proposal will not adversely affect the integrity of the protected site before consent can be lawfully granted. This high evidential threshold places the onus squarely on the applicant to demonstrate compliance, rather than relying solely on proposed mitigation or compensation strategies.

This legal framework is reinforced by relevant policy provisions, including GEN 9 and GEN 13 of the National Marine Plan, alongside Policies 3, 4(b), 4(e), and 4(f) of NPF4. Together, these establish a comprehensive and rigorous approach to safeguarding protected habitats and species, ensuring that any development proposals undergo robust assessment consistent with the Habitats Regulations. Consequently, planning consent must be withheld unless these exacting requirements are fully met.

The applicant's submission fails to demonstrate compliance with the statutory tests designed to safeguard internationally important habitats and species, as evidenced by their own derogation documents. These documents reveal an insufficient degree of certainty that the legal requirements can be met, thereby undermining the protections afforded to these ecological features. Given this clear shortfall, the

application does not fulfil the necessary legal criteria, and consent should therefore be withheld.

1.1.655 Cumulative and In-Combination Effects

The current approach to the project's assessment is fundamentally flawed, as only a portion of the development is presently before the Scottish Ministers. Critical components, specifically the export cable corridor and the onshore transmission works, which are indispensable for the wind farm's operation, have been deferred to subsequent applications. This fragmentation results in the effects of the entire project never being evaluated in a single, comprehensive process. Consequently, significant elements are subject to separate consenting procedures that follow the principal decision, undermining the integrity of the overall assessment.

Such an approach conflicts with established legal principles, notably those affirmed by the courts in Raeshaw Farms, which require that a project must be assessed in its entirety rather than segmented into smaller parts whose individual impacts might appear less significant. By effectively salami-slicing the project, the assessment fails to capture the cumulative effects and interactions of all components, thereby compromising the robustness and completeness of the environmental and planning evaluation. This procedural deficiency raises serious concerns about the legality and adequacy of the decision-making process in this case.

The practical consequence of relying on the current cumulative impact assessment is that it fails to provide an accurate picture of the combined effects of the proposal alongside other existing, consented, and foreseeable developments. This arises because the assessment is founded on baseline data from the Environmental Impact Assessment that understates effects across landscape, heritage, and socio-economic factors. As a result, the starting point for cumulative evaluation is already diminished, leading to a systematic underestimation of the true cumulative impacts.

Furthermore, the flawed baseline assessments compromise the reliability of the cumulative impact conclusions. Since each component assessment underreports the degree of harm or change, the cumulative assessment compounds these inaccuracies rather than correcting them. This methodological weakness means that decision-makers are not presented with a robust understanding of how this proposal interacts with other developments, thereby undermining confidence in the planning process and its outcomes.

There remains considerable uncertainty regarding the applicant's compliance with established planning policies and environmental regulations, specifically concerning the issue of project splitting. The requirements set out in GEN 21 and paragraph 4.85 of the National Marine Plan, alongside NPF4 Policy 11(e) and the Environmental Impact Assessment Regulations, necessitate a comprehensive and reliable identification and assessment of cumulative and in-combination effects arising from the proposal. In this instance, the applicant has not sufficiently demonstrated that these effects, nor the impacts of the project in its entirety, have been adequately considered.

Furthermore, the treatment of deferred works has not been explicitly addressed within the application or its supporting documentation. It is essential that the decision-making process explicitly considers these elements to ensure full compliance with policy and regulatory frameworks. Without such clarification and assurance, it is not possible to conclude that the proposal meets the necessary standards for environmental assessment and planning approval. Therefore, I respectfully request that the decision-making authority requires an express and thorough evaluation of the deferred works as part of the determination.

1.1.656 Public Engagement, Site Selection and Environmental Information

There is considerable uncertainty as to whether the consultation process associated with this application has met the essential standards of effective public participation. The applicant invites Scottish Ministers to place significant weight on the site-selection process, yet the deficiencies in public engagement observed at both the plan and site-selection stages have persisted into the current application phase. Given that the application comprises many thousands of pages of technical material, the scale and complexity of the documentation have further complicated meaningful engagement.

Compounding this difficulty, the consultation period coincided with the busiest months of the year for island communities, when residents are engaged continuously throughout the visitor season and access to specialist advice is notably limited. This timing has inevitably constrained the ability of those affected to provide considered and informed responses. In contrast, the applicant has had years to prepare its case, supported by substantial professional and financial resources, thereby creating an imbalance in the consultation process.

Under GEN 18 of the National Marine Plan and the principles enshrined in the Aarhus Convention, it is imperative that those affected by decisions of this magnitude are afforded a realistic opportunity to participate. The conditions under which the communities have been required to respond fall short of this benchmark. It is therefore respectfully urged that Ministers bear these concerns firmly in mind when considering the representations made, recognising the potential implications for the legitimacy of the site-selection process.

The practical consequence of the deficiencies identified in the Environmental Impact Assessment (EIA) is that the Scottish Ministers are unable to make a fully informed decision on this application. The EIA is the principal evidential basis for determination, and it is not a question of its extensiveness but rather its sufficiency. Across multiple topic areas, the application acknowledges pathways to significant effects yet fails to investigate them thoroughly. For instance, the landscape assessment derives outcomes based on a distance pattern that its own stated methodology does not support. Similarly, the heritage assessment does not adequately demonstrate the application of its own integrity test, and the socio-economic assessment lacks any place-based analysis pertinent to the affected islands. Furthermore, reliance on future assessments, post-consent plans, ongoing monitoring, and additional approvals cannot substitute for the requirement under the EIA Regulations that likely significant effects be fully understood prior to determination. The Scottish Ministers must base their decision on the evidence

currently before them, rather than on assumptions that unresolved matters will be satisfactorily addressed at a later stage. In light of these shortcomings, the applicant has not demonstrated that the environmental information submitted meets the necessary standard of adequacy for determination purposes.

1.1.657 Effects on Local Area

The applicant's assessment significantly underestimates the scale and significance of the visual, community, and heritage impacts on Iona, leading to an inaccurate evaluation of the environmental and social effects of the proposal. The Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity, with direct orientation towards the development site and extensive visibility. The predicted geographical extent of change is large, affecting an area approximately 21 kilometres away, with turbines extending across roughly 39 degrees of the horizon. This scale of visual impact is considerable, particularly when compared to familiar landmarks; for instance, Ben Hynish on Tiree, which is 141 metres high and visible from Iona at 33 kilometres, would be visually dominated by the largest turbines, which would exceed Ben Hynish's height by about 194 metres at a closer distance of roughly two-thirds that range.

The west coast of Iona is similarly characterised by high sensitivity and widespread visibility. The applicant acknowledges significant effects for residents and visitors across much of the island, including at Dùn Ì, Iona's highest point. However, despite the acknowledged sensitivity of the island's monastic landscape—encompassing the internationally important Abbey, Nunnery, and high crosses, whose significance is intimately connected to pilgrimage, arrival by sea, and movement through the landscape—the applicant's assessment falls short. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet no visualisation has been provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, a notable omission that undermines a full understanding of the visual effects on heritage assets.

Community concerns further reinforce the inadequacy of the assessment. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal. Despite this clear community response, the applicant's consultants did not assess habitability, which they themselves identified as a potential pathway of effect on the island's community. This represents a significant gap in the social impact evaluation.

In conclusion, the applicant's environmental and social impact assessment does not fully reflect the magnitude or importance of the effects on Iona's landscape, heritage, and community. The oversight of critical viewpoints, failure to assess habitability, and underestimation of visual scale collectively compromise the accuracy and reliability of the evaluation. Consequently, the scale and significance of impacts on Iona must be reconsidered with greater rigour and comprehensiveness.

The applicant's assessment categorises the South Tiree coastal area as having High sensitivity at a distance of approximately 35 kilometres, yet attributes only a Low magnitude of change to the proposed development. This characterisation warrants further scrutiny. Tiree is an exceptionally low-lying island, with its landscape

character fundamentally shaped by the dominance of sea and sky. Its highest elevation, Ben Hynish, reaches merely 141 metres above sea level. Given this context, the introduction of turbines up to 335 metres in height would represent vertical elements unprecedented within Tiree's open oceanic horizon. Such structures would inevitably alter the island's distinctive seascape character in a manner far more substantial than the assessment acknowledges. Therefore, the conclusion of a Low magnitude of change for a receptor as exposed and sensitive as Tiree appears to significantly understate the true magnitude of impact, undermining the reliability of the overall evaluation.

The applicant's environmental impact assessment employs a distance-based methodology that systematically moderates the magnitude of change and discounts the effects on highly sensitive receptors located beyond approximately 20 kilometres. This approach results in a significant underestimation of impacts, as it applies a generalized attenuation without accounting for the specific characteristics or vulnerabilities of the affected receptors. Consequently, the communities residing in these more distant locations have not been subjected to any detailed, place-based assessment, leaving a critical gap in the understanding of potential adverse effects.

This methodological limitation undermines the overall integrity and completeness of the environmental impact assessment. By failing to recognise and appropriately evaluate significant effects beyond the arbitrary 20-kilometre threshold, the applicant's approach neglects the nuanced realities of landscape sensitivity and community experience. Such systematic discounting risks the marginalisation of affected populations and compromises the robustness of environmental decision-making processes. It is therefore essential that assessments adopt a more nuanced and receptor-specific approach to accurately capture and address the full extent of environmental impacts.

1.1.658 Personal Observations

Based on my own local knowledge, I also wish to highlight that: The inevitable environmental impact of the wind farm and high voltage cables on undersea wildlife and sea birds should be given greater consideration within the risk/benefit calculation of this wind farm. In particular, given the lack of benefit for the local community and questionable benefit for the wider country (e.g. lack of grid capacity to accommodate for the additional power etc)

Finally, I would also ask the Scottish Ministers to consider: Please review the benefits of this project for local and wider communities. I support offshore renewable energy where it delivers demonstrable benefits. this proposal should not be approved merely on the basis that it is labelled "green".

The cumulative impacts from turbine installation, vessel activity, seabed disturbance, cable routes construction and operation of high-voltage subsea cables—including electromagnetic fields—will inevitably harm marine habitats, seabirds, fish, shellfish and protected species.

Any claimed decarbonisation benefit must be transparently quantified, including expected generation, lifecycle emissions, grid constraints and likely curtailment.

Consent should be conditional on enforceable mitigation, independent long-term monitoring and adaptive management, so that the scheme delivers real climate value without treating uncertain or irreversible ecological harm as an acceptable assumption.

Furthermore, within the current benefit/risk calculation, within the current context, existing Scottish transmission constraints can mean that electricity can sometimes not be fully used locally or transferred to major centres of demand elsewhere, requiring wind generators to curtail output and creating costs for consumers. Given that ScottishPower is ultimately owned by Iberdrola S.A., a Spanish-listed multinational, the project should also provide transparent evidence of how revenues and the economic value created will benefit UK bill-payers and the host community, rather than primarily accruing to an overseas parent company and its shareholders. Before the known harms become acceptable, I believe this project must demonstrate a firm and timely grid connection, realistic curtailment assumptions, and enforceable commitments on local benefit and community participation.

1.1.659 Summary

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

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to reject the associated marine licence application. Should the Ministers be inclined not to refuse consent outright, I request that they mandate the provision of further environmental information alongside enhanced visualisations. I further propose that determination of the applications be deferred until after a public inquiry, enabling a thorough examination of the issues raised in this objection. Regardless of the decision reached, I ask that the Ministers explicitly address and record their conclusions regarding the project’s effects on cultural heritage and the impacted island communities within their formal reasons.

Yours faithfully,

[Redacted]

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

Member of the public 570
Dear Sir/Madam,

I hereby submit a formal objection to the proposals put forward by MachairWind Limited (ScottishPower Renewables) concerning the MachairWind Offshore Wind Farm, which is the subject of application numbers 00012385 and 00012386. Application 00012385 requests consent under section 36 of the Electricity Act 1989, while application 00012386 seeks a marine licence in accordance with Part 4 of the Marine (Scotland) Act 2010. I request that this correspondence be treated officially as an objection, that I be recorded as an objector, and that I receive notification of the decisions reached on these applications.

The proposed development involves establishing an offshore wind farm with an installed capacity of approximately 2 gigawatts. This would comprise between 91 and 144 turbines, each with a maximum height reaching up to 335 metres to the blade tip. The site encompasses a Windfarm Development Area of around 448 square kilometres, situated north-west of the Isle of Islay and west of Colonsay. Its location is roughly 21 kilometres from Iona and lies in proximity to the islands and coastal communities of the southern Hebrides.

The following sections articulate the planning and environmental grounds supporting my objection. These considerations are framed within the statutory and policy context governing the determination of these applications. It is important to emphasise that the onus lies squarely with the applicant to provide adequate evidence demonstrating that all relevant statutory tests and policy requirements have been met. Those opposing the development are not obliged to establish contrary proof. In this instance, the applicant has failed to meet this evidential burden, and for the reasons detailed below, consent ought to be refused.

1.1.660 Conflict with National Planning Framework 4 and the Development Plan

The proposal’s mitigation measures fall short when compared against the comprehensive safeguards established by relevant NPF4 policies protecting nationally important landscapes, heritage assets, and biodiversity. Policy 11 must be considered alongside Policy 4(c) and 4(d), which explicitly protect National Scenic Areas and nationally significant landscapes from significant adverse impacts on their defining qualities. Additionally, Policy 7, particularly 7(h) concerning scheduled monuments and 7(c) and 7(d) regarding the settings of historic assets, imposes stringent requirements to preserve cultural significance. Policy 3 further demands robust ecological safeguards. The submitted evidence does not demonstrate that the proposed mitigation would adequately prevent significant harm to these designated assets, thereby failing to meet the combined intent and standards of these policies.

In light of the evidence, the proposal would cause significant adverse effects on nationally designated landscapes and seascapes. There is no satisfactory demonstration that the cultural significance of scheduled monuments and their settings would be preserved, nor that island communities would be protected in accordance with policy expectations. Furthermore, the ecological tests required under Policy 3 have not been shown to be capable of being met based on the information provided. Consequently, the proposal is in clear conflict with multiple

NPF4 policies designed to safeguard nationally important landscapes, heritage assets, and biodiversity, and therefore should not be supported.

1.1.661 Seascape, Landscape and Visual Effects

The applicant's evidence acknowledges that the proposed development results in effects that engage several key policies, specifically NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), alongside GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively aim to safeguard nationally important landscapes and seascapes from adverse impacts. However, despite recognising these policy requirements, the applicant has not satisfactorily demonstrated that its assessment of the scale of these effects aligns consistently with its own stated methodology.

Moreover, the applicant has failed to establish compliance with the protections afforded to nationally significant landscape and seascape interests. Without clear evidence to reconcile the conclusions drawn with the necessary policy safeguards, it remains uncertain that the proposal respects the statutory framework designed to preserve these valued environmental assets. This lack of demonstrable compliance raises substantive concerns regarding the proposal's conformity with relevant planning policies.

1.1.662 Cultural Landscape, Archaeology and Historic Environment

The applicant's own baseline acknowledges that the cultural significance of the affected heritage assets is derived from a range of experiential qualities, including pilgrimage routes, arrival by sea, and movement through a living cultural landscape. These qualities encompass the interrelationships between monuments, spirituality, and the encompassing landscape and seascape, and are primarily experienced dynamically through movement rather than from fixed viewpoints. This complexity in cultural significance suggests that any assessment must adequately capture the broader cultural landscape and the experiential nature of these assets to properly evaluate potential impacts.

Historic Environment Scotland's consultation responses, as recorded within the application, have highlighted deficiencies in the applicant's assessment, specifically requesting additional viewpoints to better represent these wider qualities. This indicates a recognition that the current assessment may not fully encompass the heritage assets' cultural landscape or experiential dimensions. Without addressing these concerns, the appraisal risks underestimating the true extent of heritage impacts, thereby undermining the robustness of the environmental evaluation.

The heritage impact conclusions presented rely fundamentally on the findings of the landscape assessment. However, when the landscape effects are understated, as previously demonstrated, this understatement directly transfers to and compromises the accuracy of the heritage conclusions that are constructed upon them. In this regard, the mitigation measures proposed cannot be fully trusted to address the true extent of harm, since their basis—the landscape assessment—is itself deficient.

This reliance on an incomplete landscape evaluation weakens the overall credibility of the heritage impact appraisal. If the landscape effects are not accurately assessed

and articulated, the subsequent heritage conclusions inevitably fail to reflect the genuine magnitude of impact on heritage assets. Consequently, the robustness of the planning decision-making process is undermined, and the potential for effective mitigation is diminished. This fundamental flaw calls for a reassessment of the landscape evidence before any definitive heritage impact conclusions are accepted.

The proposal fails to comply with essential policy requirements concerning the protection of heritage assets. Specifically, it engages National Planning Framework 4 (NPF4) Policy 7(h) relating to scheduled monuments, alongside Policies 7(c) and 7(d) addressing the setting of such assets, as well as GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. These policies collectively establish a stringent framework for safeguarding the cultural significance of heritage sites and their environs.

Despite this clear policy context, the applicant has not provided adequate evidence to demonstrate that the cultural significance of internationally and nationally important heritage assets, including their settings, will be preserved. Crucially, the Scottish Ministers do not have before them the comprehensive assessment that would be necessary to reach such a conclusion. This absence undermines confidence in the proposal's capacity to protect these irreplaceable assets effectively.

In light of the above, it is concluded that the application does not meet the key policy requirements for heritage protection and therefore cannot be considered acceptable. Proper adherence to the relevant policies is indispensable to ensure that heritage assets are preserved for current and future generations, a standard that this proposal fails to satisfy.

1.1.663 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development rely heavily on visitor numbers, with the latter drawn specifically by the very qualities the applicant’s own baseline assessments identify: landscape, seascape, cultural heritage, tranquillity and remoteness. Any alteration to these attributes would directly undermine the fundamental economic base that sustains these communities. This dependency means that changes to the environment risk precipitating a decline not only in tourism revenue but also in essential local services and population stability.

Such a decline poses a serious threat to the long-term viability of these island settlements. The economic and social sustainability of the islands is intrinsically linked to the preservation of their unique visitor-attracted characteristics. Therefore, the proposal’s impact on these key qualities must be given paramount consideration, as it jeopardises the continued existence and prosperity of the island communities themselves.

The applicant’s own consultants acknowledge that habitability represents a potentially significant pathway through which the proposed development could impact island communities; however, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 is conducted at a regional scale, focusing in detail on port

communities while neglecting a comparable place-based evaluation of the island communities directly facing the development. Despite this omission, the assessment nevertheless concludes that these island communities exhibit low sensitivity to tourism effects.

This approach is fundamentally flawed, as small island economies cannot be accurately represented by regional averages. Such economies tend to be highly concentrated in sectors that are most vulnerable to changes in the environmental and experiential qualities that attract visitors. Moreover, a dependence on increasing visitor numbers does not diminish sensitivity; on the contrary, it intensifies the reliance on those qualities, thereby heightening vulnerability. Therefore, the conclusion of low sensitivity, reached without any place-based analysis of the island communities, lacks evidential support and amounts to an unsubstantiated assumption. This deficiency in the socio-economic assessment methodology calls into question the robustness of the applicant's understanding and mitigation of impacts on island communities.

The applicant acknowledges that island communities warrant particular scrutiny but has failed to undertake the necessary assessment to understand the effects of the proposal upon them. This omission means that the proposal does not demonstrate compatibility with sustainable island communities, nor does it show that the statutory duties owed to those communities have been fulfilled. The proposal engages GEN 19 and paragraph 4.81 of the National Marine Plan, which require decisions to be based on sound socio-economic evidence and to adopt a precautionary approach where such evidence is lacking. Moreover, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 mandate that the interests of island communities be assessed and given due weight through meaningful engagement from the inception to the conclusion of any proposal. Given the absence of adequate assessment and meaningful engagement, the proposal fails to meet these essential planning and statutory standards for protecting island communities.

1.1.664 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, with the adjacent waters providing habitat for seabirds, marine mammals, and basking sharks. The proposed project would involve large-scale construction, operational, and decommissioning activities extending over several decades, introducing sustained disturbance into this ecologically sensitive environment.

Given the presence of these protected species and habitats, the potential for significant adverse environmental effects is considerable. The long-term nature and scale of the development could disrupt key ecological functions, necessitating thorough assessment and mitigation to address the sensitivity of the site and its surrounding marine ecosystem.

The practical consequence of the applicant's submission of a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan is that it implicitly acknowledges the possibility of adverse impacts on the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are specifically prepared for circumstances in which an adverse effect on

the integrity of a protected site cannot be definitively ruled out. Their inclusion within the application therefore signals the applicant's recognition that mitigation measures alone may not suffice to prevent harm, necessitating recourse to derogation provisions.

Moreover, the submission of such documents constitutes a significant feature of the application process, as it indicates that the Scottish Ministers may reach a different conclusion from the applicant regarding the presence or absence of adverse effects on the protected site. This suggests a level of uncertainty or dispute about the environmental impacts, reinforcing the importance of careful scrutiny of the proposed compensation measures. While the applicant has taken steps to address potential effects, the reliance on derogation documentation highlights the need for thorough assessment to ensure that the integrity of the Special Protection Area is not compromised.

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

The applicant's submissions fail to demonstrate compliance with the statutory tests designed to protect internationally important habitats and species. Despite the inclusion of derogation documents intended to support the case, these materials reveal an insufficient degree of certainty that the necessary legal safeguards can be met. This absence of clarity undermines the fundamental requirements imposed by relevant environmental legislation, which demand rigorous proof that adverse effects on protected ecological features will be avoided or adequately mitigated.

Given this evidential shortfall, the application cannot be regarded as satisfying the statutory criteria for consent. The failure to establish that the prescribed tests have been met calls into question the legitimacy of any grant of permission. In light of the above, the case for allowing the proposed development is significantly weakened, and refusal is warranted to ensure the protection of internationally important ecological assets.

1.1.665 Cumulative and In-Combination Effects

The current application addresses only a portion of the proposed development, excluding critical components such as the export cable corridor and onshore transmission works, which are essential for the wind farm's operation. This fragmented approach results in the effects of the entire project never being assessed

collectively; instead, significant elements are deferred to future consenting processes. Such a method is inconsistent with established legal principles, as affirmed by the courts in Raeshaw Farms, which mandate that a project must be evaluated in its entirety rather than divided into smaller parts to diminish the apparent scale of individual impacts. Consequently, the assessment as presented is both legally and procedurally deficient, undermining a comprehensive understanding of the development's full implications.

The cumulative impact assessment relies fundamentally on the findings of the Environmental Impact Assessment, which includes separate evaluations of landscape, heritage, and socio-economic effects. However, as established, these individual assessments have consistently understated the extent of impacts. This initial understatement creates a diminished baseline from which the cumulative effects are measured. Consequently, when the proposal's effects are combined with those of other existing, consented, and foreseeable developments, the cumulative assessment does not fully capture the true magnitude of combined impacts. This reliance on a reduced baseline results in an overall underestimation of cumulative effects, thereby rendering the cumulative impact assessment unreliable. It follows that the assessment's conclusions should be treated with caution, as they do not accurately reflect the full scope of potential environmental and socio-economic consequences.

The applicant has failed to demonstrate that the cumulative and in-combination effects of the proposal have been reliably identified and assessed, contrary to the requirements set out in GEN 21 and paragraph 4.85 of the National Marine Plan, as well as NPF4 Policy 11(e) and the Environmental Impact Assessment Regulations concerning project splitting. This omission raises significant concerns regarding the adequacy of the environmental assessment and the potential for unaccounted adverse impacts arising from the proposal.

Furthermore, the absence of explicit consideration of the deferred works within the application undermines the ability to fully understand the project as a whole. The decision-making process must expressly address these deferred elements to ensure compliance with the stated policies and regulations. Without such clarity, there is a risk that the cumulative effects will be underestimated, potentially leading to environmental harm that could have been mitigated through comprehensive evaluation.

In light of these points, it is imperative that the determination of this application includes a thorough assessment of the deferred works and a reliable identification of all cumulative and in-combination effects. Only with this information can the planning authority fulfil its statutory duties and ensure that the development proceeds in a manner consistent with relevant policy and regulatory requirements.

1.1.666 Public Engagement, Site Selection and Environmental Information

There is considerable uncertainty regarding the adequacy of public participation in the site-selection process, an uncertainty that fundamentally challenges the legitimacy of the applicant's case. The applicant requests that Scottish Ministers place significant weight on this process, yet the quality of public engagement

throughout both the plan and site-selection stages has been demonstrably deficient. These shortcomings have persisted into the application stage itself, which is extensive and complex, comprising many thousands of pages of technical material. Crucially, the consultation period has coincided with the busiest months for island communities, a time when residents are fully occupied with continuous work during the visitor season and when access to specialist advice is severely limited. This situation contrasts sharply with the applicant's position, having had years to prepare and substantial professional and financial resources at its disposal.

The National Marine Plan, specifically GEN 18, alongside the principles of effective public participation enshrined in the Aarhus Convention, establish that those affected by decisions of this scale must be afforded a realistic opportunity to engage. Regrettably, the conditions under which affected communities have been expected to respond fall short of these established standards. This shortfall undermines the fairness and inclusiveness that are essential to legitimate decision-making processes. It is imperative that Scottish Ministers recognise this deficiency and take it fully into account when considering the representations made.

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

The Environmental Impact Assessment submitted with the application fails to provide sufficient information for the Scottish Ministers to make a fully informed decision. While it identifies potential pathways to significant environmental effects across multiple topics, the assessment does not investigate these impacts comprehensively. For example, the landscape assessment employs a distance pattern not supported by its own methodology, the heritage assessment neglects to apply its established integrity test, and the socio-economic assessment omits place-based analysis relevant to the affected islands. Furthermore, the application frequently relies on future assessments, post-consent plans, ongoing monitoring, and additional approvals, none of which satisfy the EIA Regulations' requirement that likely significant effects be thoroughly understood prior to determination. The Scottish Ministers must base their decision on the evidence currently before them, not on the expectation that unresolved issues will be addressed satisfactorily at a later stage. Consequently, the applicant has not demonstrated that the environmental information submitted is adequate for the purposes of determination.

1.1.667 Effects on Local Area

The proposed development encompasses a 448 square kilometre area immediately north-west of Islay and west of Colonsay, placing the Atlantic-facing communities of these islands in closest proximity to the project. Despite this, the applicant's assessment treats Islay chiefly as a potential project location rather than recognising it as a discrete affected community. There is no place-based evaluation of the significant effects on Islay's setting, economy, or community life, thereby underestimating direct impacts on the island's population. For Colonsay and

Oronsay, whose daily life is defined by a seaward outlook directly facing the development array, the situation is particularly acute. The North Colonsay and Western Cliffs Special Protection Area, integral to Colonsay's coastline and the subject of the applicant's derogation and compensation proposals, highlights an acknowledged risk that harm to this internationally protected seabird population cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance within this community, suffers from the same deficiencies identified in the heritage assessment, notably the inadequate consideration of its open maritime setting. Collectively, these factors demonstrate a significant underassessment of the direct and consequential effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, calling into question the reliability of the environmental and heritage impact evaluations presented by the applicant.

The applicant's assessment significantly underestimates the scale and importance of visual, community, and heritage impacts on Iona, resulting in an incomplete evaluation of environmental and social effects. The Coastal Character assessment identifies the Sound of Iona as having high sensitivity, with direct orientation towards the development area and extensive visibility. The geographical extent of change is large, with turbines visible across approximately 39 degrees of the horizon from a distance of about 21 kilometres, producing a moderate and significant overall effect. Similarly, the highly sensitive west coast of Iona experiences widespread visibility of the proposals, and the applicant acknowledges significant effects on residents and visitors throughout much of the island, including at Dùn Ì, the island's highest point.

Iona's internationally important monastic landscape, comprising the Abbey, the Nunnery, and high crosses, derives its significance from pilgrimage, arrival by sea, and movement through the landscape, as noted in the applicant's baseline. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet no visualisation has been provided from key vantage points such as the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn. This omission undermines the thoroughness of the heritage impact assessment.

Community concerns are also insufficiently addressed. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal. Despite the applicant's consultants identifying habitability as a potential pathway of effect on the community, no assessment of this has been undertaken. The perceived scale of the turbines further illustrates the magnitude of visual impact; for example, Ben Hynish on Tiree, a familiar landmark standing 141 metres tall and visible from Iona at approximately 33 kilometres, would be overtopped by the largest turbines by around 194 metres at a closer distance of roughly two-thirds that span.

Taken together, these factors demonstrate that the applicant's assessment does not fully capture the significant and wide-ranging effects on Iona's landscape, heritage, and community, calling into question the accuracy and completeness of the environmental and social impact evaluation.

The practical consequence of the applicant's assessment is a significant underestimation of the visual, economic, and community impacts on Mull and the Ross of Mull coastal areas. The Ross of Mull South coastal area, identified as of

High sensitivity at distances of approximately 22 to 24 kilometres, is attributed only a Medium magnitude of effect. This is despite the applicant's acceptance of significant effects at Erraid, on the Core Paths of the Ross, and notably at Fionnphort—the gateway to Iona and critical embarkation point for visitors—where the community is directly tied to tourism flows. Similarly, across Mull, significant effects are acknowledged on Core Paths and within the Central, South, and West Mull Local Landscape Areas. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands and recognised as of High sensitivity at 21 to 33 kilometres, is nonetheless assessed at no more than Medium magnitude. This approach fails to fully reflect the cumulative and place-specific nature of the impacts.

Moreover, the applicant's reliance on distance as a primary determinant, exemplified by the treatment of the Wilderness and Gribun Rocks coastal area—where effects are judged small due to viewing distances exceeding 30 kilometres—demonstrates a simplistic methodology that inadequately captures the scale and character of change experienced locally. The applicant does not provide a place-based assessment for communities whose economies and identities are intimately linked to the Atlantic seascape, such as those dependent on tourism, wildlife boat operations, and accommodation in Mull's western townships. The proposed development's industrialising effect on this seascape is therefore insufficiently recognised, leaving a critical gap in understanding the broader community and economic consequences. It is essential that these factors be fully addressed to ensure a balanced and accurate evaluation of the project's impacts.

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

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

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

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

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

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

The applicant's assessment assigns a Low magnitude of change to the South Tiree coastal area despite recognising it as a receptor of High sensitivity at a distance of approximately 35 kilometres. This characterization is inconsistent with the exceptional sensitivity of Tiree's landscape, which is notably defined by its low-lying topography and expansive seascape. When compared to other locations where vertical structures have been introduced, the assessment's mitigation considerations appear insufficient to justify such a modest magnitude of change in this context.

Tiree's distinctive landscape character is fundamentally shaped by the dominance of sea and sky, with its highest elevation at Ben Hynish reaching only 141 metres. The introduction of turbines up to 335 metres in height represents vertical elements unprecedented within this open oceanic horizon. This scale of intervention would significantly alter the visual and experiential qualities of the island's seascape. Accordingly, the conclusion of a Low magnitude of change for such a sensitive and exposed receptor markedly understates the effects and results in an unreliable evaluation of impacts on Tiree's landscape character.

The applicant's assessment fails to consider significant effects on mainland and island communities that have direct views of the proposed development and rely economically on the seascape. For instance, Gigha, a community-owned island celebrated nationally as a symbol of island regeneration following its purchase by residents, faces the development area from the east. The omission of any examination of impacts on Gigha's closely balanced community and economy undermines the thoroughness of the assessment. Similarly, the west coast of Kintyre comprises a chain of communities whose identity, outlook, and visitor economy are closely tied to the open Atlantic seaboard facing Islay, Jura, and surrounding waters. The Treshnish Isles and other small islands and mainland coasts with views towards the development share this direct relationship with the seascape, yet their interests have been overlooked.

Moreover, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These high-quality seaward panoramas are precisely the type of receptors for which the applicant's distance-based moderation has been applied in this objection. By disregarding these communities and their economic and visual connections to the seascape, the assessment compromises its comprehensiveness

and fails to address key receptors that would experience significant effects. This omission weakens the credibility of the applicant's conclusions and highlights the need for a more inclusive and detailed evaluation of all affected communities.

The assessment reveals a systematic pattern whereby the applicant's methodology reduces the recognised significance of effects on sensitive receptors located beyond approximately 20 kilometres. This approach results in the moderation of the magnitude of change and a corresponding discounting of impacts at these distances. Such a consistent pattern undermines the credibility of the environmental impact assessment, as it fails to fully acknowledge the potential consequences experienced by affected communities.

Moreover, this methodological choice means that those communities residing beyond the 20-kilometre threshold have not been subject to any detailed, place-specific assessment. The absence of a focused evaluation for these areas risks overlooking important localised effects, thereby limiting the scope and depth of the environmental appraisal. Consequently, the assessment does not provide a comprehensive understanding of the broader environmental and social ramifications.

In conclusion, the applicant's distance-based approach leads to an underestimation of significant effects on highly sensitive receptors beyond 20 kilometres, which compromises the integrity of the entire environmental impact assessment. This systematic discounting should be reconsidered to ensure that all relevant receptors and communities receive appropriate and thorough evaluation.

1.1.668 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy requirements applicable to its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the local communities and cultural heritage of this coastal area. However, subsequent analyses of the applicant's documentation reveal that these impacts have been understated. Crucially, the necessary heritage assessment has not been undertaken, and the identified effects on the island communities within the project's influence have remained unassessed. Furthermore, the ecological criteria required by law have not been demonstrated as achievable. It is also pertinent to note that only a portion of the project has been submitted for consideration by the Scottish Ministers.

In light of these shortcomings, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to decline the associated marine licence. Should the Ministers determine otherwise, I request that they require the submission of additional environmental information along with enhanced visual representations of the proposal. Moreover, I recommend that the applications be subject to a public inquiry, ensuring that all matters raised in this objection receive thorough examination. Regardless of the outcome, I further request that the Ministers explicitly address and provide clear conclusions in their decision-making on the effects of the proposal on cultural heritage and the island communities affected.

Yours faithfully,

[Redacted]

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

Member of the public 571
Dear Sir/Madam,

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

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

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

1.1.669 Legislative and Policy Framework

The application before the Scottish Ministers raises significant uncertainty regarding 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 preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, as well as protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant must take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The evidence submitted fails to demonstrate that these requirements have been adequately addressed.

In addition, the Scottish Ministers, as the determining authority, are themselves required to have regard to these same statutory duties when deciding on the application. The absence of clear evidence showing that the applicant has fulfilled these obligations creates a procedural and substantive deficiency in the application. This lack of demonstrated compliance undermines confidence that the proposal aligns with the legal framework governing such developments.

Where compliance with these statutory duties has not been demonstrated, or where the evidence reveals deficiencies, omissions, or conflicts with the applicable legal and policy framework, these matters must weigh against the granting of consent.

Given the current uncertainties and evidential shortcomings, the application should not be approved in its present form.

The marine licence application under consideration fails to demonstrate compliance with the statutory requirements set out in Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland's National Marine Plan. The application does not adequately address the General Policies critical to the assessment, including GEN 4 on Co-existence, GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 and paragraph 4.85 on Cumulative Impacts. The absence of clear, robust evidence demonstrating adherence to these policies constitutes a fundamental deficiency in the application. This failure undermines the statutory assessment process, as the decision-making authority is required to ensure that authorisation decisions are taken in accordance with the National Marine Plan unless relevant considerations indicate otherwise. The application's shortcomings in evidencing compliance with these policies mean that the statutory framework has not been satisfied.

Furthermore, the evidence explicitly identifies omissions and conflicts with the applicable legal and policy framework, which weigh decisively against the granting of consent. The lack of demonstrated compliance with the National Marine Plan's General Policies, particularly those addressing environmental protection, historic environment safeguards, landscape considerations, and cumulative impacts, reveals procedural and substantive defects in the application. These deficiencies preclude a lawful and policy-compliant determination in favour of the proposal. In accordance with the Marine (Scotland) Act 2010 and the National Marine Plan, where compliance has not been demonstrated or where evidence reveals such conflicts and omissions, the appropriate conclusion is to refuse consent. Therefore, the marine licence application should be rejected on the grounds that it fails to meet the statutory and policy requirements essential for lawful authorisation.

The proposal fails to comply with key policies of National Planning Framework 4 (NPF4), which is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. Specifically, the application does not demonstrate compliance with Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy). These policies are directly engaged by the proposal, and the absence of demonstrated compliance raises serious concerns regarding the protection and enhancement of biodiversity, the safeguarding of natural places, the conservation of historic assets, and the responsible use of energy resources.

Moreover, the evidence identifies deficiencies and omissions in the application's adherence to the applicable legal and policy framework under NPF4. Where such compliance has not been demonstrated, or where conflicts with statutory duties and policies exist, these matters weigh decisively against the granting of consent. The proposal's failure to meet these essential policy requirements undermines the statutory purpose of NPF4 and the legislative protections it enshrines, rendering the application unacceptable in planning terms. Consequently, the proposal should be

refused on the basis of its non-compliance with the fundamental provisions of National Planning Framework 4.

The proposal fails to meet the statutory requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations, which mandate that the likely significant environmental effects must be identified, assessed, and reported prior to any determination. This fundamental procedural step has not been adequately fulfilled, resulting in an incomplete environmental impact assessment that undermines the decision-making process.

Furthermore, the proposal does not comply with the Habitats Regulations, which require a thorough assessment of the effects on European protected sites in accordance with the relevant statutory tests. The absence of such an assessment or the failure to demonstrate compliance with these tests constitutes a serious omission that conflicts directly with the legal framework governing protected habitats.

Given these deficiencies and the failure to demonstrate compliance with both the environmental impact assessment and habitats regulations, the proposal is in clear conflict with the applicable legal and policy requirements. Such shortcomings must weigh heavily against the granting of consent in this case.

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

The applicant has failed to discharge the fundamental evidential burden required to demonstrate compliance with all relevant legal and policy requirements governing this proposal. It is an established principle that the applicant must provide robust, objective, and proportionate evidence to confirm that every applicable statutory duty, planning policy, and environmental assessment obligation has been fully satisfied. In this case, the submitted documentation and supporting materials fall short of this essential standard.

Specifically, the evidence presented does not conclusively establish that all statutory duties have been met, nor does it adequately address the full scope of planning policies and environmental assessment criteria pertinent to the development. The absence of such comprehensive and convincing evidence constitutes a critical deficiency. Moreover, the applicant’s failure to resolve or even acknowledge these evidential gaps results in unresolved conflicts with the applicable legal and policy framework.

Given these shortcomings, the proposal cannot be regarded as compliant with the statutory and policy regime that governs planning decisions. The lack of demonstrated compliance is not a minor procedural oversight but a substantive failure that undermines the legitimacy of the application. As set out in the governing principles, where compliance is not demonstrated, or where evidence reveals deficiencies or conflicts, these factors must weigh decisively against the granting of planning consent.

In conclusion, the applicant has not met the requisite evidential standard to prove that the proposal accords with all relevant legal and policy requirements. This failure to demonstrate compliance is a fundamental and determinative flaw that compels refusal of planning permission.

1.1.670 Conflict with National Planning Framework 4 and the Development Plan

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

The proposal fails to comply with several National Planning Framework 4 (NPF4) policies designed to protect nationally important landscapes, heritage assets, and biodiversity, resulting in practical consequences that undermine these statutory safeguards. Specifically, Policy 11 must be read in conjunction with Policy 4(c) and 4(d), which seek to prevent significant adverse effects on the qualities of National Scenic Areas and other nationally important landscapes. Furthermore, Policies 7, including 7(h) concerning scheduled monuments and 7(c) and 7(d) regarding the setting of historic assets, impose clear duties to protect cultural significance. Policy 3 addresses biodiversity protection requirements. The evidence demonstrates that the proposal would cause significant adverse impacts on designated landscapes and seascapes, failing to uphold their protected qualities. Additionally, the applicant has not adequately demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, nor that island communities affected by the development would be safeguarded. Crucially, the ecological assessments submitted do not satisfy the necessary tests to ensure biodiversity protection as mandated by Policy 3. In light of these factors, the proposal is at odds with the cumulative policy framework of NPF4, raising substantial concerns regarding its acceptability in terms of nationally important environmental and heritage considerations.

The assessment finds that the proposal is in clear conflict with the terrestrial development plan framework, including the Argyll and Bute Local Development Plan 2. This plan is specifically designed to safeguard landscape, heritage, and

community interests from adverse effects arising from development. The proposal would, however, have a detrimental impact on these protected interests, thereby contravening the policies set out within the development plan. Furthermore, when considering National Planning Framework 4 in its entirety, the proposal remains inconsistent with the overarching planning objectives intended to guide sustainable and appropriate development. The applicant has not provided sufficient evidence or argumentation to demonstrate that these conflicts can be resolved or justified. In conclusion, the proposal fails to accord with the relevant terrestrial development plan policies and the wider national framework, warranting its refusal on these grounds.

1.1.671 Seascape, Landscape and Visual Effects

The applicant's assessment methodology lacks a defined distance threshold beyond which major effects are considered to cease, yet an independent Evidence Note reveals a consistent pattern: no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of its inherent sensitivity or extent of visibility. This pattern is corroborated by the applicant's own documents, which acknowledge the influence of distance on their judgements—for example, an area over 30 kilometres away is assessed as experiencing only a small scale of change due to viewing distance. Furthermore, the Landscape Character synthesis categorises magnitude as High within roughly 20 kilometres, Medium between about 20 and 30 kilometres, and Low beyond approximately 30 kilometres for certain landscape types. This systematic moderation of magnitude at distances coinciding with the location of the most sensitive designated landscapes means that the protective tests are applied to understated inputs. Consequently, the conclusions drawn do not provide a reliable description of the effects that Scottish Ministers are being asked to consent to.

When assessing the visual impact of proposed developments, it is important to compare the limitations of the visualisation materials with any mitigation measures put forward. In this case, the applicant has relied on visual evidence prepared in accordance with NatureScot's guidance. While this approach represents best practice, it is essential to recognise that printed visualisations cannot fully replicate the scale or immersive experience that a viewer perceives on site. This inherent limitation means that the visualisations may underrepresent certain perceptual effects or fail to capture the full extent of visual intrusion that could be experienced in reality.

Furthermore, the wireline drawings included within the panoramic projections share the same constraints as the accompanying photographic elements. These wireline images are not independent assessments but rather technical renderings integrated within the overall visualisation package. As such, they do not serve to correct or enhance the photographic representation but must be interpreted within the same limitations. This highlights the challenge in relying solely on these materials for a definitive understanding of the development's visual effects, suggesting that supplementary on-site assessments may be necessary to fully appreciate potential impacts.

In light of these considerations, while the visualisation materials provide a useful starting point for evaluation, their technical and perceptual limitations mean that

conclusions drawn from them should be treated with caution. Decision-makers should weigh the visual evidence alongside other forms of assessment and recognise that the materials do not capture the full complexity of visual experience in the field. This balanced approach ensures that the potential impacts on visual amenity are neither overstated nor understated in the planning process.

The proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration of the night-time seascape character for the entire 35-year operational period. This change would be immediately perceptible and enduring, fundamentally transforming the visual experience of the seascape after dark.

Beyond the operational lifespan, the harm caused to the seascape character cannot be dismissed, as consenting to this development effectively designates the area as suitable for wind farm use. Such a decision carries lasting policy implications by establishing a precedent that the existing unlit seascape is appropriate for industrial-scale lighting and associated visual impacts.

Consequently, the introduction of permanent lighting must be carefully weighed within the planning framework, considering not only the immediate and ongoing effects on night-time seascape character but also the broader message such consent would send about the acceptability of this landscape for wind energy development. The decision should reflect a clear understanding of these implications before authorising the proposal.

The proposal’s acknowledged effects engage multiple provisions of the National Planning Framework 4, specifically Policies 4(c) and 4(d), Policies 11(d) and 11(e), alongside Policy GEN 7 and paragraph 4.28 of the National Marine Plan. Despite this clear policy relevance, the applicant has failed to demonstrate that its conclusions regarding the scale of these effects align with the methodology it purports to have employed. This shortcoming undermines confidence in the accuracy and reliability of the impact assessments presented. Moreover, the proposal does not evidence compliance with the policies designed to protect nationally important landscapes and seascapes, which are of significant planning and environmental value. In light of these deficiencies, it is concluded that the proposal does not meet the requirements of the key planning policies safeguarding landscape and seascape interests and should therefore be refused.

1.1.672 Cultural Landscape, Archaeology and Historic Environment

The applicant’s assessment employs the methodology recognised by Historic Environment Scotland for evaluating effects on the setting of historic assets. This methodology, developed and refined through consultation with Historic Environment Scotland, mandates an evaluation not only of visual change but specifically whether such changes affect the contribution that setting makes to the cultural significance of the heritage asset, as well as whether the integrity of the setting is adequately retained. Importantly, the methodology explicitly states that visual change should not be equated directly with adverse impact, requiring a nuanced and comprehensive assessment beyond mere visibility or proximity considerations.

However, a Methodological Audit prepared in support of community objections, drawing solely on the applicant's Appendix 14.3, identifies a critical deficiency in the applicant's operational assessment. While the assessment acknowledges relevant heritage attributes such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it fails to demonstrate how the integrity of the setting has been evaluated in accordance with the applicant's own accepted methodology. The assessment effectively describes visual changes but omits the essential evaluative step required by the methodology—namely, a clear analysis of how those visual changes translate into effects on cultural significance and setting integrity. This omission undermines the reliability of the applicant's conclusions that the integrity of the setting is adequately retained, thereby calling into question the overall robustness of the heritage impact assessment.

The applicant's baseline assessment acknowledges that the cultural significance of the heritage assets in question arises from a range of qualities, including pilgrimage, arrival by sea, movement through a living cultural landscape, the interrelationships between monuments, spirituality, and the surrounding landscape and seascape, which are experienced dynamically through movement rather than from fixed viewpoints. However, Historic Environment Scotland, as recorded in the application's consultation responses, has identified that the assessment may not fully capture these broader experiential qualities. They have requested the inclusion of additional viewpoints to ensure that the wider cultural landscape and its intangible values are properly represented. This suggests that the applicant's current assessment may inadequately reflect the holistic and lived experience of the heritage assets, which is critical to understanding their full cultural significance.

The landscape assessment forms a foundational element upon which the heritage impact conclusions are constructed. Any understatement within the landscape assessment inevitably permeates through to the heritage analysis, resulting in a parallel minimisation of potential effects. This dependency means that if the landscape impacts are not fully or accurately represented, the subsequent conclusions regarding heritage impacts cannot be regarded as robust or credible.

Given the identified deficiencies in the landscape assessment, it follows that the heritage conclusions are similarly compromised. The inherent reliance of heritage evaluations on the landscape context necessitates a precise and comprehensive landscape assessment to underpin any heritage impact findings. Without this, the heritage conclusions are undermined by the same shortcomings, diminishing their reliability and calling into question the overall validity of the assessment.

The application engages National Planning Framework 4 (NPF4) Policy 7(h) concerning scheduled monuments, as well as Policies 7(c) and 7(d) relating to the setting of heritage assets, together with GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. These provisions collectively establish a rigorous framework intended to ensure that the cultural significance of heritage assets, particularly those of international and national importance, and their settings are duly protected in the planning process.

However, the applicant has failed to demonstrate that such protection will be secured. There is a conspicuous absence of a comprehensive assessment to

confirm that the cultural significance of these heritage assets and their settings will not be compromised. Consequently, the Scottish Ministers do not have before them the necessary evidence to conclude that the application complies with the relevant heritage protection policies. This deficiency undermines the acceptability of the proposal in terms of its compliance with policy requirements for safeguarding heritage assets.

1.1.673 Effects on Island Communities, Tourism and the Local Economy

The proposed development poses a significant threat to the fundamental economic and social sustainability of the island communities concerned. These communities rely exceptionally heavily on visitors, who are attracted precisely by the qualities identified in the applicant's own baseline assessments: the landscape, seascape, cultural heritage, tranquillity and remoteness. Any alteration to these defining attributes would directly undermine the economic foundation upon which these communities depend.

Such an impact would extend beyond mere economics, affecting local services, population stability and the overall viability of the island settlements. The interdependence between the visitor experience and community sustainability is clear, and therefore the proposal's effect on the qualities that draw visitors must be considered with the utmost seriousness.

The practical consequence of the applicant's flawed socio-economic assessment is a significant underestimation of the potential impacts on island communities directly facing the proposed development. Despite identifying habitability as a key pathway through which the proposal could affect these communities, no specific assessment of their habitability was undertaken. Instead, the assessment focuses on regional port communities, concluding that island communities exhibit low sensitivity to tourism effects without any place-based analysis to support this claim.

This approach fails to recognise the unique economic structures of small island communities, which differ markedly from regional averages. Island economies are heavily concentrated in sectors that are most vulnerable to changes in the environmental and social qualities attracting visitors. Rather than mitigating sensitivity, reliance on increasing visitor numbers intensifies dependence on these qualities, thereby heightening the risk of socio-economic harm. Consequently, the conclusion of low sensitivity is not founded on evidence but rests on an unsubstantiated assumption.

In light of these shortcomings, the socio-economic assessment does not provide a reliable basis for understanding or mitigating impacts on island communities. Without a thorough, place-specific evaluation of habitability and economic sensitivity, the applicant's methodology is inadequate. This undermines confidence in the planning process and necessitates a more robust and locally informed assessment to ensure that the interests and vulnerabilities of island communities are properly addressed.

The applicant acknowledges that island communities require particular scrutiny in the planning process but has failed to undertake the necessary assessment to understand the proposal's effects on these communities. Despite this recognition,

the evidence provided does not demonstrate that the proposal is compatible with the principles of sustainable island communities. Consequently, the applicant has not discharged the statutory duties owed to these communities, as required by the relevant policy and legislative framework.

This omission directly conflicts with the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions be based on sound socio-economic evidence and adopt a precautionary approach where such evidence is lacking. Furthermore, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 require that the interests of island communities be assessed and given appropriate weight through meaningful engagement from the inception to the conclusion of any proposal. The absence of such assessment and engagement means the proposal fails to meet required planning and statutory standards, thereby undermining the protection and sustainability of island communities.

1.1.674 Ecology, Biodiversity and Habitats Regulations

The development area and its adjacent waters are of considerable ecological significance, encompassing Priority Marine Features and Annex I habitats. These habitats are accompanied by important populations of seabirds, marine mammals, and basking sharks. The proposed development would introduce extensive construction, operational, and decommissioning activities into this sensitive marine environment, sustained over a period of several decades. Given the scale and duration of the proposed works, there is a substantial potential for significant adverse environmental effects, necessitating careful consideration of the ecological implications inherent in the proposal.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are characteristically prepared when an adverse effect on the integrity of a protected site cannot be definitively ruled out. Notably, the inclusion of these materials constitutes a significant element of the application, as it implicitly acknowledges the possibility of adverse impacts. Furthermore, the applicant’s own position suggests that Scottish Ministers may ultimately reach a different conclusion regarding the presence or extent of any adverse effects. While these submissions demonstrate the applicant’s recognition of potential impacts and an intent to mitigate them, this does not in itself confirm that all concerns have been fully addressed or resolved.

While mitigation, compensation measures, and future monitoring are often proposed to address potential impacts on protected habitats, these alone do not satisfy the stringent legal requirements set out under the Habitats Regulations. Consent for developments affecting such sites can only be lawfully granted where the competent authority is assured that the proposal will not adversely affect the integrity of the protected site, and no reasonable scientific doubt remains. This high evidential standard places the burden firmly on the applicant to demonstrate compliance, rather than relying solely on mitigation proposals. This framework is reinforced by relevant policies, including GEN 9 and GEN 13 of the National Marine Plan, alongside NPF4 Policies 3, 4(b), 4(e), and 4(f), which collectively emphasize the necessity for robust

scientific certainty before consent can be given. In light of these clear legal and policy imperatives, any development proposals must rigorously meet these standards to secure lawful consent.

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

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

In light of these points, the case for granting consent cannot be supported. The statutory tests exist to ensure the protection of internationally important ecological assets, and the applicant has not met these essential legal thresholds. Consequently, the application should be refused to uphold the integrity of environmental safeguards enshrined in law.

1.1.675 Cumulative and In-Combination Effects

The evidence submitted by the applicant highlights a critical procedural deficiency in the current assessment approach. It is noted that only a portion of the project is presently under consideration by the Scottish Ministers, specifically excluding the export cable corridor and the onshore transmission works. These components are essential for the wind farm’s operation but are deferred to future applications. Consequently, the cumulative effects of the entire project are never evaluated collectively, resulting in a fragmented and incomplete assessment.

This segmented approach contravenes established legal principles, as emphasised in the Raeshaw Farms case, which mandates that a project must be assessed in its entirety rather than being divided into smaller parts whose individual impacts may seem less significant. By deferring key elements to subsequent consenting processes after the principal decision is made, the current methodology undermines the integrity of the environmental assessment and fails to provide decision-makers with a comprehensive understanding of the project's full implications. This procedural flaw calls into question the validity of the current assessment and supports a need for a holistic evaluation of the entire project at this stage.

The cumulative impact assessment relies fundamentally on the findings established in the broader Environmental Impact Assessment, as detailed in the applicant’s evidence. This means that the baseline conditions for landscape, heritage, and socio-economic factors form the foundation upon which cumulative effects are

evaluated. However, if these initial assessments understate the true extent of impacts, the cumulative assessment inherently inherits this deficiency.

Because the baseline is reduced, the assessment of combined effects from the proposed development alongside other existing, consented, and foreseeable projects is consequently understated. This approach risks overlooking the full magnitude of the cumulative impacts that may arise, thereby compromising the reliability of the overall environmental appraisal. It is essential that the baseline accurately reflects current conditions to ensure that the cumulative effects are neither underestimated nor misrepresented.

In light of this, the cumulative impact assessment as presented cannot be regarded as a fully robust or dependable evaluation of the combined effects. Without addressing the foundational understatements in the baseline assessments, there remains significant uncertainty regarding the true scale of cumulative impacts, which warrants further scrutiny before the proposal can be confidently supported.

There remains significant uncertainty regarding compliance with essential planning policies and environmental regulations, specifically concerning the issue of project splitting and the assessment of cumulative effects. The applicant has not sufficiently demonstrated that the combined and in-combination impacts of the proposal, including the effects of the project in its entirety, have been thoroughly and reliably identified or evaluated. This omission is particularly pertinent given the requirements set out in GEN 21 and paragraph 4.85 of the National Marine Plan, alongside the stipulations of NPF4 Policy 11(e) and the Environmental Impact Assessment Regulations.

In light of these shortcomings, it is imperative that the decision-making process explicitly addresses the treatment of deferred works associated with the project. Without clear and comprehensive consideration of these elements, the assessment remains incomplete and potentially non-compliant with the relevant policy framework and regulatory duties. Therefore, I respectfully request that the determination expressly incorporates an evaluation of the deferred works to ensure full adherence to planning and environmental requirements.

1.1.676 Public Engagement, Site Selection and Environmental Information

While mitigation measures may address certain environmental concerns, the fundamental deficiencies in public participation and consultation timing critically undermine the legitimacy of the site-selection process. The applicant requests that Scottish Ministers place significant weight on this process; however, the quality of public engagement throughout both the plan and site-selection stages has been inadequate and has persisted into the application phase. The application itself consists of thousands of pages of technical material, yet the consultation period was scheduled during the busiest months for island communities—when residents are occupied with continuous work throughout the visitor season and access to specialist advice is limited. This contrasts sharply with the applicant’s extensive preparation time, supported by substantial professional and financial resources. National Marine Plan policy GEN 18 and the principles of effective public participation, as enshrined in the Aarhus Convention, mandate that those affected must have a realistic

opportunity to engage in decisions of this scale. The conditions imposed on the affected communities have fallen short of this standard, and Ministers are urged to consider this firmly when evaluating the representations submitted.

The Environmental Impact Assessment submitted with this application fails to provide sufficient information for the Scottish Ministers to make a fully informed decision. While the assessment identifies potential pathways to significant environmental effects across multiple topics, it does not investigate these impacts comprehensively. For example, the landscape assessment's conclusions rely on a distance-based pattern that is not supported by the methodology set out in its own documentation. Similarly, the heritage assessment lacks demonstrable application of its stated integrity test, and the socio-economic assessment omits any place-based analysis of the affected islands, undermining its robustness. Moreover, the applicant's dependence on future assessments, post-consent plans, ongoing monitoring, and subsequent approvals does not satisfy the requirements of the EIA Regulations, which mandate that likely significant effects must be understood prior to determination. It is imperative that the Scottish Ministers base their decision on the evidence currently before them, rather than on assumptions that unresolved matters will be adequately addressed at a later stage. Given these deficiencies, the applicant has not demonstrated that the environmental information submitted is adequate for the purposes of this application.

1.1.677 Effects on Local Area

The applicant's assessment acknowledges Islay and Colonsay as the closest islands to the proposed development, which lies immediately north-west of Islay and west of Colonsay. However, the evaluation primarily considers Islay in terms of its potential as a direct project location rather than as an affected island community in its own right. This approach overlooks the Atlantic-facing communities of Islay, which confront the nearest edge of a 448 square kilometre development area, without any place-based assessment of the impacts on their setting, economy, or community life. For Colonsay and Oronsay, the seaward outlook that is central to daily life directly faces the proposed array. Notably, the North Colonsay and Western Cliffs Special Protection Area forms Colonsay's coastline and is the focus of the applicant's derogation case and compensation plan, implicitly recognising that harm to the internationally protected seabird population there cannot be ruled out. Furthermore, Oronsay Priory—a scheduled monument of national importance—lies within this community's area, yet the identified deficiencies in the heritage assessment equally apply to the evaluation of its open maritime setting. Taken together, these points demonstrate that the applicant's assessment underestimates the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby undermining the reliability of the overall environmental and heritage impact evaluation.

The applicant's assessment notably underestimates the scale and significance of visual, community, and heritage impacts on Iona, thereby compromising the accuracy of the environmental and social impact evaluation. The Coastal Character assessment identifies the Sound of Iona as an area of High sensitivity, with extensive visibility and a Large geographical extent of change. The turbines would be visible across approximately 39 degrees of the horizon from a distance of some

21 kilometres, producing a Moderate and Significant overall effect. Similarly, the West Coast of Iona is recognised as highly sensitive, with widespread visibility; the applicant concedes significant effects on residents and visitors across much of the island, including at Dùn Ì, Iona's highest point.

Iona's monastic landscape, comprising internationally important heritage assets such as the Abbey, the Nunnery, and the high crosses, is intrinsically linked to experiences of pilgrimage, arrival by sea, and movement through the landscape. Despite Historic Environment Scotland's request for additional viewpoints—including from the ferry crossing itself—no visualisation is provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, an omission that weakens the thoroughness of the heritage impact assessment. Moreover, a household consultation on Iona revealed that 92 per cent of respondents oppose the proposal, yet the applicant's consultants fail to assess habitability, despite identifying it as a potential pathway of effect on the community. To contextualise the visual scale, the tallest turbines would exceed Ben Hynish on Tiree—visible from Iona at approximately 33 kilometres and standing 141 metres high—by roughly 194 metres, at a closer distance of around two-thirds of that range.

In light of these factors, the applicant's evaluation does not adequately reflect the magnitude of impacts on Iona's landscape, community, and heritage values. This underestimation undermines the credibility of the environmental and social impact assessment and calls for a more comprehensive and rigorous appraisal before the proposal can be properly considered.

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

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

The approach taken towards the Wilderness and Gribun Rocks coastal area further exemplifies this concern. Despite the acknowledged viewing distance of over 30 kilometres, the applicant judges the scale of change to be small, relying primarily on distance-based reasoning. This method, as outlined in the applicant's own terms,

risks overlooking the qualitative aspects of visual and experiential impact that extend beyond mere separation distance.

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

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

The applicant's assessment fails to fully acknowledge the significant consequences for the wider seaboard's designated landscapes and the island communities that depend on their unspoilt natural and cultural qualities. Ulva, situated within the Loch na Keal National Scenic Area, is a community-owned island in the early stages of regeneration. Its small, re-establishing population relies heavily on the pristine setting and undisturbed seascape that are directly threatened by the proposed development. Yet, no specific assessment has been made regarding the impacts on Ulva, leaving this vulnerable community's future inadequately considered.

Similarly, Staffa, renowned as one of Europe's most celebrated small islands and also within the Loch na Keal National Scenic Area, lies approximately 35 kilometres from the development site. This distance exceeds the 30-kilometre threshold recommended by NatureScot for assessing effects on National Scenic Area qualities. Despite recognising Staffa's panoramic maritime qualities, the applicant concludes that any changes would be small and not significant. This conclusion appears inconsistent with the acknowledged importance of Staffa's landscape and does not convincingly justify the dismissal of potential adverse effects at this notable distance.

Further afield, the Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed by the applicant as having High sensitivity but only Medium to Low magnitude of effect due to distance and retained landforms. The Scarba, Lunga and the Garvellachs National Scenic Area, situated between 35 and 40 kilometres away, receives a similar evaluation. These moderate assessments inadequately reflect the fundamental qualities upon which these designations depend and overlook the cumulative and indirect impacts on these sensitive landscapes. Taken together, these omissions and underestimations undermine the protection of vital natural and cultural assets and the island communities that cherish them.

The applicant's assessment recognises the South Tiree coastal area as having High sensitivity at a distance of approximately 35 kilometres, yet attributes only a Low magnitude of change to the effects of the proposed development. This evaluation appears inconsistent given the acknowledged sensitivity of the receptor and its considerable distance from the site.

Tiree's landscape is uniquely characterised by its exceptionally low-lying topography, with its highest point, Ben Hynish, reaching merely 141 metres. The island's defining features are the expansive sea and sky, presenting an open oceanic horizon. The introduction of turbines up to 335 metres in height would create vertical elements unprecedented in Tiree's seascape. Consequently, the applicant's conclusion of a Low magnitude of change in such an exposed and sensitive environment significantly understates the true extent of the impact, rendering the overall evaluation unreliable.

The applicant's assessment fails to consider significant effects on mainland and island communities that maintain direct visual and economic connections with the seascape of the proposed development. This omission undermines the comprehensiveness of the environmental evaluation and risks overlooking impacts that could materially affect local livelihoods and community cohesion.

Gigha, a community-owned island celebrated as a national symbol of island regeneration, faces the development waters from the east. The finely balanced social and economic fabric of this community has not been examined in the assessment, despite its potential vulnerability to changes in seascape character. Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the receptors to which the applicant's distance-based visual impact moderation is applied, yet the significance of these views for tourism and local identity has not been adequately addressed.

Furthermore, the chain of communities along the west coast of Kintyre depends on the open Atlantic seaboard outlook towards Islay, Jura, and surrounding waters, which define their character and support their visitor economies. The Treshnish Isles, other small islands, and mainland coasts sharing views of the development area are similarly positioned. By excluding these receptors from thorough assessment, the applicant neglects the full scope of potential seascape effects, thereby compromising the robustness of the environmental appraisal. It is essential that these communities be fully considered to ensure a balanced and informed decision-making process.

The applicant's assessment methodology employs a distance-based approach which systematically moderates the magnitude of change and discounts the effects on sensitive receptors located beyond approximately 20 kilometres. As noted in the submitted evidence, wherever the assessment encounters a highly sensitive receptor beyond this threshold, the effect is diminished in significance, despite the presence of such receptors. This approach results in an absence of place-based evaluation for the communities affected at these greater distances, thereby overlooking localized impacts that may be considerable.

This systematic moderation undermines the integrity of the environmental impact assessment by failing to fully account for the potential effects on distant but sensitive receptors. The reliance on a rigid distance criterion to reduce the perceived magnitude of change does not reflect the nuanced realities experienced by affected communities, who have received no tailored or specific assessment of the impacts they face. Consequently, the assessment does not provide a comprehensive or accurate appraisal of environmental effects beyond 20 kilometres, calling into question the robustness of its conclusions and the adequacy of the mitigation measures proposed.

1.1.678 Personal Observations

In addition to the planning matters above, I am personally concerned because: Amid the many logistical and legal concerns included in this objection, I would also like to remark on my personal connection to Iona as a place of spiritual and historical heritage, community, and beauty. Iona as is has enriched my sense of connection and wonder to the world and through my travels there I've met friends from abroad that will last me a lifetime. I hope that many people I know, and many future generations, will be able to travel to Iona, experience it unobstructed, and experience the same breadth and depth of blessings and more that I did. Additionally I also plan to return many times throughout my life and benefit its local economy while sharing in the gifts it offers. I would hate to see its beauty and peace marred in any manner. Thank you for your time in hearing my objections.

1.1.679 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges considerable impacts on nationally designated landscapes, as well as on the coastal communities and their heritage. However, independent reviews of the submitted documentation reveal that these impacts have been understated. Crucially, the necessary heritage assessment has not been completed, and the identified effects on the island communities within the project's vicinity remain unassessed. Furthermore, the ecological criteria stipulated for such developments have not been demonstrated as achievable. It is also pertinent that the application before the Scottish Ministers represents only a portion of the overall project.

In light of these deficiencies, it is respectfully submitted that consent for the MachairWind Offshore Wind Farm should be refused, alongside the associated marine licence. Should the Ministers consider granting approval, it is urged that they first require the provision of additional environmental information and enhanced visual representations. Moreover, determination of the applications should be deferred until after a public inquiry, thereby allowing thorough examination of the objections raised. Regardless of the final decision, it is requested that the Ministers provide clear and explicit conclusions within their reasons, specifically addressing the impacts on cultural heritage and the affected island communities.

Yours faithfully,

[Redacted]

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

Member of the public 572
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, detailed in application references 00012385 and 00012386. These applications, lodged by MachairWind Limited (ScottishPower Renewables), seek consent under section 36 of the Electricity Act 1989 and a marine licence under Part 4 of the Marine (Scotland) Act 2010, respectively. I request that this letter be recorded as an official objection, that I be entered on the register of objectors, and that I receive notification of the final determination of these applications.

The project under consideration involves the construction of an offshore wind farm with a generating capacity of approximately 2 gigawatts. It proposes between 91 and 144 turbines, each with a maximum blade tip height of 335 metres, situated within a designated Windfarm Development Area spanning roughly 448 square kilometres of marine environment. This site lies to the north-west of Islay and west of Colonsay, at an approximate distance of 21 kilometres from Iona, and is in close proximity to the southern Hebridean islands and nearby coastal communities.

My opposition is founded upon comprehensive planning and environmental grounds, assessed within the context of the applicable statutory and policy framework governing these applications. It is important to emphasise that the onus lies entirely with the applicant to provide robust evidence demonstrating that all relevant planning and environmental tests are met. Objectors are not obliged to substantiate contrary claims. In this instance, the applicant has failed to meet that evidential burden. For the reasons outlined herein, consent should be withheld.

1.1.680 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989, which require the applicant to have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. This failure has practical consequences in that the proposal risks causing unmitigated harm to these protected interests.

The evidence confirms that the applicant has not adequately addressed these statutory requirements, nor taken reasonable steps to mitigate adverse effects arising from the proposal. This omission represents a clear deficiency in the application and conflicts with the legal framework governing such developments. The Scottish Ministers, as the determining authority, are required to have regard to these same duties and cannot lawfully grant consent where compliance has not been demonstrated.

Given these shortcomings, the application should be refused. The failure to meet the statutory duties under Schedule 9 weighs decisively against the granting of consent, as the proposal does not satisfy the essential legal and policy obligations intended to safeguard important environmental and heritage interests.

The marine licence application under consideration must be determined in strict accordance with Part 4 of the Marine (Scotland) Act 2010 and the policies set forth in Scotland's National Marine Plan. The statutory framework mandates that authorisation decisions align with the National Marine Plan unless relevant considerations indicate otherwise. Central to this assessment are the General Policies GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts). These policies collectively establish the criteria against which the application must be evaluated.

A detailed examination of the application reveals that compliance with these statutory policies has not been demonstrated. The evidence submitted fails to adequately address the requirements of GEN 4 concerning co-existence, which is critical to ensuring that the proposed development does not adversely affect existing marine activities and uses. Furthermore, the application does not satisfactorily engage with the historic environment policies GEN 6 and the related paragraphs 4.22 to 4.23, leaving significant uncertainty regarding potential impacts on heritage assets. Similarly, the provisions of GEN 7 and paragraph 4.28 relating to landscape and national scenic areas have not been met, as the application lacks sufficient assessment or mitigation measures to protect these designated landscapes.

The natural heritage considerations under GEN 9 are also inadequately addressed, with omissions in the evidence base that undermine confidence in the protection of marine biodiversity and habitats. The engagement requirements stipulated by GEN 18 have not been fulfilled, as the application does not demonstrate meaningful consultation or involvement of relevant stakeholders. Crucially, the application falls short of the standards set by GEN 19 and paragraph 4.81 concerning sound evidence; the data and assessments provided are incomplete or insufficiently robust to support a lawful and informed decision. Lastly, the cumulative impacts policy GEN 21 and paragraph 4.85 have not been properly considered, with the application neglecting to evaluate the combined effects of the proposal alongside existing and planned marine activities.

Given these substantive deficiencies, omissions, and conflicts with the applicable legal and policy framework, the application does not meet the statutory requirements for marine licence determination. As established by the Marine (Scotland) Act 2010 and the National Marine Plan, such failures weigh decisively against the granting of consent. Therefore, the application should be refused on the grounds that it does not comply with the statutory policies and evidential standards necessary for lawful authorisation.

This proposal fails to demonstrate compliance with the mitigation requirements set out in National Planning Framework 4 (NPF4), specifically in relation to biodiversity, natural places, historic assets, and energy policies. NPF4 is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. The proposal engages Policies 3, 4, 7, and 11 of NPF4, which respectively address Biodiversity, Natural Places, Historic Assets and Places, and Energy.

The submitted evidence does not establish that the proposal meets the standards or obligations imposed by these policies. Policy 3 requires the protection and enhancement of biodiversity, yet the application lacks sufficient demonstration of how biodiversity will be conserved or improved. Similarly, under Policy 4, the proposal fails to adequately safeguard natural places, with no clear evidence of measures to prevent harm or to promote natural environment quality.

Regarding historic assets, Policy 7 mandates the preservation and appropriate management of historic assets and places. The application does not provide convincing evidence that these assets will be preserved or that any adverse impacts will be mitigated in accordance with the policy's requirements. Finally, Policy 11 on Energy sets out expectations for sustainable energy use and management, which the proposal does not satisfactorily address.

Where compliance with these policies has not been demonstrated, or where deficiencies, omissions, or conflicts with the applicable legal and policy framework are identified, these matters weigh decisively against the granting of consent. Given the absence of evidence confirming adherence to NPF4's key policies, the proposal is contrary to the statutory and policy framework and should be refused planning permission.

The applicant's submission fails to comply with the statutory requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations, which mandate that the likely significant environmental effects of the proposal must be identified, assessed, and reported prior to any determination. The evidence provided does not demonstrate that a comprehensive environmental impact assessment (EIA) has been conducted in accordance with these regulations. This omission constitutes a fundamental procedural defect, as the absence of a thorough EIA undermines the decision-making process by leaving the determining authority without the necessary information to evaluate the environmental consequences of the development.

Furthermore, the applicant has not fulfilled the obligations imposed by the Habitats Regulations, which require an assessment of the proposal's effects on European protected sites in line with the applicable statutory tests. The evidence does not show that such a habitats regulations assessment (HRA) has been properly undertaken or that compliance with these legal requirements has been demonstrated. Given these deficiencies and omissions, the proposal conflicts with the relevant legal and policy framework. In accordance with established planning principles, where compliance with environmental and habitats legislation has not been evidenced, these failings must weigh decisively against the granting of consent.

The proposal fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities be properly considered and given due weight in the decision-making process. The submitted evidence does not show that these statutory obligations have been met. This omission constitutes a clear deficiency and procedural failure in the application's assessment. As established by the Act and confirmed in the supporting evidence, where such compliance is not demonstrated, or where there are identified

omissions or conflicts with the legal and policy framework, these factors must weigh against the granting of consent. Therefore, on the basis of the proposal's failure to properly consider and weigh the interests of island communities as required by the Islands (Scotland) Act 2018, the application should be refused.

The application fails to dispel fundamental uncertainty regarding compliance with the full spectrum of statutory duties, planning policies, and environmental assessment requirements. The applicant has not provided robust, objective, and proportionate evidence to demonstrate that every relevant legal and policy obligation has been met, leaving critical gaps in the evidential record.

Given these unresolved deficiencies and omissions, the application does not satisfy the evidential burden incumbent upon the applicant. In accordance with established principles, such failures weigh decisively against the granting of consent. The absence of demonstrated compliance with all applicable frameworks mandates refusal.

1.1.681 Conflict with National Planning Framework 4 and the Development Plan

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

The proposal fails to comply with multiple NPF4 policies designed to protect nationally important landscapes, heritage assets, and biodiversity, resulting in significant adverse effects on these designated assets. Policy 11 operates alongside Policies 4(c) and 4(d), which safeguard National Scenic Areas and nationally important landscapes from significant adverse impacts on their defining qualities. Furthermore, Policy 7, including 7(h) concerning scheduled monuments and 7(c) and 7(d) regarding the setting of historic assets, requires protection of cultural significance. Policy 3 addresses biodiversity conservation. The evidence demonstrates that the proposal would cause considerable harm to nationally designated landscapes and seascapes, fails to show that the cultural significance and settings of scheduled monuments would be preserved, does not adequately safeguard island communities, and does not satisfy the necessary ecological tests

based on the submitted information. Consequently, the proposal is in clear conflict with these relevant NPF4 policies.

The proposal is found to be in conflict with the terrestrial development plan framework, including the Argyll and Bute Local Development Plan 2. Specifically, it would adversely affect the landscape, heritage, and community interests that these policies are designed to protect. This adverse impact demonstrates inconsistency with the development plan as a whole. Furthermore, when considered alongside National Planning Framework 4, the proposal remains at odds with the overarching policy framework, and the applicant has not provided sufficient evidence to dispel this conclusion. Therefore, the proposal fails to accord with the relevant land-based policies and should be refused accordingly.

1.1.682 Seascape, Landscape and Visual Effects

The applicant's assessment methodology, as set out in Appendix 16.1, lacks a clearly defined distance threshold beyond which major effects are considered to cease. This omission has a direct practical consequence: the predicted effects reported cannot be regarded as fully reliable. An independently prepared Evidence Note, which critically analyses the applicant's Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern across all three assessment streams. Specifically, no highly sensitive receptor located beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of that receptor's sensitivity or the extent of visibility. This indicates an implicit, if unacknowledged, distance-based limitation within the methodology.

Further scrutiny of the applicant's own documents confirms the influence of distance in shaping the assessment outcomes. For example, the evaluation of a coastal area over 30 kilometres from the site explicitly states that, due to the viewing distance, the scale of change is judged to be small. Additionally, the Landscape Character synthesis categorises magnitude as High within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. This gradation effectively moderates the magnitude of effect as distance increases, despite there being no formal threshold set out in the methodology.

The consequence of this implicit distance moderation is significant: the protective tests applied within the assessment rely on understated inputs for magnitude at the very distances where the most sensitive designated landscapes are situated. Therefore, the conclusions drawn from the applicant's methodology do not reliably represent the true extent or severity of effects that Scottish Ministers are being asked to consent to. In light of this, the assessment methodology's failure to transparently and consistently account for distance effects undermines confidence in the accuracy and robustness of the predicted impacts.

The visualisation materials submitted in support of the application are inherently limited in their ability to convey the true scale and impact of the development as experienced on site. According to NatureScot's visualisation guidance, which the applicant follows, printed visualisations cannot fully replicate the scale perceived by a viewer in the field. Furthermore, the wireline drawings included within the panoramic projections share these same limitations, as they are technical renderings

embedded within the visualisation rather than independent corrections or enhancements. Consequently, reliance on these materials alone may lead to an underestimation of the development's visual effects, and this should be carefully considered in the assessment process.

The introduction of aviation and navigation lighting as part of the proposed development will permanently alter the character of the night-time seascape, which is currently unlit. This change will persist throughout the stated 35-year operational life of the project, fundamentally transforming the visual experience of the sea horizon after dark.

Beyond the immediate physical impact, the duration of the development's operational life does not diminish the policy implications of this harm. Consent for the project effectively signifies an acceptance that this particular seascape is appropriate for wind farm use, setting a precedent for how such areas are valued and protected within planning policy frameworks.

Given the permanent nature of the lighting effects and the broader policy message conveyed by approval, careful consideration must be given to whether this change to the night-time seascape aligns with the intended landscape protection objectives. The decision will have lasting consequences for the seascape's character and the interpretation of its suitability for similar developments in the future.

The proposal's acknowledged effects on the landscape and seascape are significant enough to engage multiple policies within the planning framework, specifically NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively aim to safeguard nationally important landscapes and seascapes from adverse impacts, underscoring the importance of rigorous assessment and mitigation measures.

However, the applicant has failed to substantiate that its assessment of these effects aligns with its own stated methodology. This lack of methodological consistency undermines the credibility of the conclusions presented and raises concerns about the accuracy of the predicted scale of impacts. Without clear evidence demonstrating that the assessment complies with established procedures, it is impossible to ascertain whether the proposal adequately addresses the relevant policy requirements.

In light of these deficiencies, the proposal does not meet the necessary standards set out in the planning policies designed to protect nationally important landscape and seascape interests. Consequently, the application should be refused on the grounds of non-compliance with the relevant statutory planning policies, ensuring that these valued environmental assets are properly conserved.

1.1.683 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of effects on the setting of historic assets is stated to follow Historic Environment Scotland's recognised methodology, which has been developed and refined in consultation with that body. This methodology requires an evaluation of whether changes to the setting affect the contribution that setting

makes to the cultural significance of heritage assets, and whether the integrity of the setting is adequately retained. Importantly, it is made clear that visual change alone should not be directly equated with adverse impact.

However, a detailed Methodological Audit, prepared to support community objections and working solely from the applicant's Appendix 14.3, reveals significant shortcomings in how the applicant's assessment has been conducted. While the operational assessment identifies relevant heritage attributes, it fails to demonstrate how the integrity of the setting has been evaluated in accordance with the applicant's own accepted methodology. The assessment focuses primarily on describing visual change—discussing factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—before concluding that the integrity of the setting is adequately retained. Crucially, the Audit finds that the essential evaluative step required by the methodology is absent in all of the examined worked examples.

This omission undermines the reliability of the applicant's conclusions regarding heritage impacts, as the assessment does not adequately apply the prescribed methodological framework to determine whether the setting's contribution to cultural significance is materially affected. Consequently, the assessment's integrity and the robustness of its findings on heritage impacts must be called into question.

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

The practical consequence of relying on the existing landscape assessment is that any understatement of landscape effects directly compromises the reliability of the heritage impact conclusions. If the landscape assessment fails to fully capture the extent or significance of visual or environmental changes, then the subsequent heritage evaluation, which depends upon those landscape findings, will similarly present an incomplete or diminished picture of the true effects on heritage assets. This interdependency means that the heritage conclusions cannot be viewed in isolation but must be critically examined in the context of the preceding landscape analysis.

Furthermore, the heritage conclusions inherit the deficiencies present in the landscape assessment, leading to a systematic understatement of potential harm. Without an accurate and comprehensive landscape assessment, the evaluation of heritage impacts risks overlooking or downplaying adverse effects that may have material significance. Therefore, the credibility of the heritage impact conclusions is fundamentally undermined by the shortcomings in the landscape assessment, calling into question the robustness of the overall appraisal as it currently stands.

There remains significant uncertainty as to whether the application complies with key policy requirements concerning heritage protection. The proposal engages NPF4 Policy 7(h) on scheduled monuments and Policies 7(c) and 7(d) on setting, alongside GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. These policies collectively establish a clear framework for safeguarding the cultural significance of internationally and nationally important heritage assets and their settings.

However, the applicant has failed to demonstrate adequately that these heritage assets and their settings will be protected. Crucially, the Scottish Ministers do not have before them the comprehensive assessment necessary to support such a conclusion. In the absence of this essential information, the application cannot be deemed acceptable in terms of heritage policy compliance.

1.1.684 Effects on Island Communities, Tourism and the Local Economy

The proposal poses a serious threat to the fundamental economic and social sustainability of the island communities concerned. These communities rely to an exceptional degree on visitors, whose arrival is motivated precisely by the qualities identified in the applicant’s own baseline assessments: the landscape, seascape, cultural heritage, tranquillity, and remoteness of the area. Any changes to these defining characteristics would directly undermine the economic base of these communities. This economic harm would, in turn, affect essential local services, reduce population retention and growth, and jeopardise the ongoing viability of the communities themselves. In light of these factors, the proposal should be viewed as incompatible with the long-term sustainability of the island communities it would impact.

The failure to assess the habitability of the affected island communities has practical consequences for understanding the proposal’s full socio-economic impact. Although the applicant’s consultants acknowledged habitability as a potentially significant pathway for effects on island communities, no specific place-based assessment was undertaken. Instead, the socio-economic evaluation in Chapter 18 focuses on regional-level analysis, emphasizing port communities while neglecting equivalent scrutiny of the islands directly facing the development. Despite this omission, the assessment concludes that these island communities have low sensitivity to tourism effects, a finding that lacks evidential support. Small island economies differ markedly from regional averages, as they are heavily reliant on sectors most vulnerable to changes in the qualities attracting visitors. This reliance does not lessen their sensitivity but rather increases their dependence on those at-risk attributes. Therefore, the conclusion of low sensitivity, reached without detailed, place-specific analysis, amounts to an assumption rather than a demonstrated fact.

Such an approach undermines confidence in the adequacy of the socio-economic assessment to identify or mitigate potential adverse impacts on island communities.

The applicant acknowledges that island communities require particular scrutiny in the planning process but has failed to undertake the necessary assessment to understand the proposal's effects on these communities. Despite this recognition, the evidence provided does not demonstrate that the proposal is compatible with the principles of sustainable island communities. Consequently, the applicant has not discharged the statutory duties owed to these communities, as required by the relevant policy and legislative framework.

This omission directly conflicts with the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions be based on sound socio-economic evidence and adopt a precautionary approach where such evidence is lacking. Furthermore, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 require that the interests of island communities be assessed and given appropriate weight through meaningful engagement from the inception to the conclusion of any proposal. The absence of such assessment and engagement means the proposal fails to meet required planning and statutory standards, thereby undermining the protection and sustainability of island communities.

1.1.685 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, as identified in the applicant's evidence. Additionally, the surrounding waters serve as habitats for seabirds, marine mammals, and basking sharks. This highlights the ecological importance and sensitivity of the site, given the presence of these protected species and habitats.

The proposed development would introduce extensive construction, operational, and decommissioning activities into this environmentally sensitive area over several decades. Such large-scale and prolonged disturbance carries a significant risk of adverse environmental effects on the Priority Marine Features and protected species present, necessitating careful consideration of potential impacts and mitigation measures.

The 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.

The applicant correctly acknowledges that under the Habitats Regulations, consent for developments affecting protected sites may only be granted where the competent authority has ascertained that the proposal will not adversely affect the integrity of the site, except where the stringent derogation tests are satisfied. It is essential to recognise that consent can lawfully be granted only when there is no reasonable scientific doubt concerning the absence of adverse effects. Furthermore, the burden of demonstrating this rests squarely with the applicant, and measures such as mitigation, compensation proposals, and future monitoring, while potentially beneficial, do not in themselves suffice to prove that the statutory tests have been met.

This legal framework is reinforced by relevant planning policies, including GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). These policies collectively impose a high evidential standard to safeguard protected habitats and species, ensuring that development proposals must be supported by robust and conclusive scientific evidence before consent can be granted. The integration of these policies with the Habitats Regulations underlines the comprehensive and precautionary approach required in decision-making.

Given this context, it is imperative that any development proposal subject to these requirements must provide unequivocal scientific evidence demonstrating no adverse effect on the protected site's integrity. Reliance on mitigation or monitoring alone is insufficient to meet the legal and policy standards. Therefore, decision-makers should maintain rigorous scrutiny of the evidence presented, ensuring compliance with both the statutory tests and the accompanying planning policies before granting consent.

The practical consequence of the applicant's failure to demonstrate compliance with the statutory tests is that the proposed development cannot be lawfully approved without risking harm to internationally important habitats and species. A detailed examination of the submitted evidence, including the applicant's own derogation documents, reveals an absence of sufficient certainty that the necessary legal protections will be upheld. This lack of demonstrable compliance undermines the statutory framework designed to safeguard these ecological features. Consequently,

the application falls short of the legal requirements, and consent should therefore be withheld.

1.1.686 Cumulative and In-Combination Effects

The current application addresses only a portion of the proposed development, excluding critical components such as the export cable corridor and onshore transmission works, which are essential for the wind farm's operation. This fragmented approach results in the effects of the entire project never being assessed collectively; instead, significant elements are deferred to future consenting processes. Such a method is inconsistent with established legal principles, as affirmed by the courts in Raeshaw Farms, which mandate that a project must be evaluated in its entirety rather than divided into smaller parts to diminish the apparent scale of individual impacts. Consequently, the assessment as presented is both legally and procedurally deficient, undermining a comprehensive understanding of the development's full implications.

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

The assessment finds that the proposal fails to comply with the requirements set out in GEN 21 and paragraph 4.85 of the National Marine Plan, as well as NPF4 Policy 11(e), and the Environmental Impact Assessment Regulations concerning project splitting. The applicant has not satisfactorily demonstrated that the cumulative and in-combination effects of the development have been reliably identified and assessed. Moreover, the effects of the project as a whole, including any deferred works, have not been adequately considered. It is therefore requested that the decision-making process explicitly addresses the treatment of these deferred works to ensure full compliance with relevant policies and regulatory obligations. In conclusion, without this comprehensive assessment, the proposal does not meet the necessary planning and environmental standards and should not be approved in its current form.

1.1.687 Public Engagement, Site Selection and Environmental Information

The deficiencies in public participation and the timing of consultations have significantly undermined the legitimacy of the site-selection process, with practical consequences for the weight that the Scottish Ministers may reasonably place on it. The applicant requests substantial deference to the site-selection process; however, the quality of public engagement at both the plan and site-selection stages has been inadequate and this shortfall has persisted into the application stage. The application itself consists of many thousands of pages of technical material, yet the consultation period coincided with the busiest months for island communities, when residents are fully occupied with continuous work throughout the visitor season and when access

to specialist advice is most limited. Meanwhile, the applicant has benefited from years of preparation supported by considerable professional and financial resources.

The National Marine Plan's Policy GEN 18 and the principles of effective public participation enshrined in the Aarhus Convention require that those affected must have a realistic and meaningful opportunity to engage in decisions of this scale. The conditions under which the affected communities were expected to respond plainly fall short of these standards. Consequently, it is imperative that the Scottish Ministers take these deficiencies into account when assessing the representations made, recognising the compromised nature of public participation in this process.

There remains considerable uncertainty regarding the sufficiency of the Environmental Impact Assessment submitted with this application. While the assessment is extensive in scope, the critical question is whether it provides an adequate evidential basis for the Scottish Ministers to reach a fully informed decision. The assessment identifies potential pathways to significant environmental effects but frequently fails to investigate these thoroughly or employs methodologies that undermine the reliability of its conclusions. For example, the landscape assessment produces outcomes based on a distance pattern not supported by its own stated methodology; the heritage assessment does not apply its own integrity test convincingly; and the socio-economic assessment lacks a place-based analysis relevant to the affected islands. Such deficiencies cast doubt on the robustness of the environmental information presented.

Furthermore, the application relies in part on future assessments, post-consent plans, monitoring arrangements, and additional approvals to address outstanding issues. However, this approach does not satisfy the requirements of the Environmental Impact Assessment Regulations, which mandate that likely significant effects must be understood prior to determination. The Scottish Ministers are obliged to base their decision on the evidence currently before them, not on assumptions that unresolved matters will be addressed satisfactorily at a later stage. Given the inadequacies identified, the applicant has not demonstrated that the environmental information submitted is sufficient for determination. Consequently, the application should not be approved until these fundamental evidential shortcomings are remedied.

1.1.688 Effects on Local Area

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

For Colonsay and Oronsay, the situation is particularly acute as the seaward outlook that shapes everyday life directly faces the proposed array. The North Colonsay and

Western Cliffs Special Protection Area, which forms Colonsay's coastline, is central to the applicant's derogation case and compensation plan, highlighting an admission that harm to the internationally protected seabird population cannot be ruled out. This clearly signifies substantial environmental risks to the local ecology that are insufficiently addressed in the current assessment.

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

The applicant's assessment of the visual and community impacts on Iona appears to underestimate the scale and significance of these effects when compared with the Coastal Character assessment and known sensitivities of the area. While mitigation measures are proposed, the Coastal Character assessment highlights that the Sound of Iona exhibits high sensitivity, with direct orientation towards the development and extensive visibility. The turbines would extend approximately 39 degrees across the horizon at a distance of around 21 kilometres, producing an overall effect described as Moderate and Significant. This broad geographical extent of change notably includes impacts on the ferry crossing between Fionnphort and Iona, an important community and visitor route, yet the applicant's visualisations do not encompass key viewpoints such as the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, despite Historic Environment Scotland's request for additional perspectives including from the ferry itself.

Furthermore, the West Coast of Iona is similarly assessed as highly sensitive, with widespread visibility of the proposed development. The applicant accepts that significant effects would occur for residents and visitors across much of the island, including at Dùn Ì, the highest point of Iona. The heritage significance of Iona's monastic landscape, encompassing the Abbey, the Nunnery and the high crosses, is internationally recognised and intrinsically linked to pilgrimage, arrival by sea and movement through the landscape. The applicant's baseline acknowledges this, yet the omission of certain visualisations and the limited assessment of experiential impacts call into question the completeness of the heritage impact evaluation. This is particularly important given the cultural and historic prominence of these sites and their relationship to views and approaches across the island.

In addition to these considerations, community response further challenges the adequacy of the assessment. A household consultation revealed that 92 per cent of respondents on Iona object to the proposal, indicating strong local concern. Crucially, the applicant's own consultants identified habitability as a potential pathway of effect on the island's community, yet no assessment of this impact appears to have been undertaken. The scale of the turbines can be contextualised by comparison with Ben Hynish on Tiree, a familiar landmark standing 141 metres tall and visible from Iona at approximately 33 kilometres. The largest turbines would overtop Ben Hynish by around 194 metres while being located at roughly two-thirds of that distance, emphasising their imposing presence. Taken together, these points

demonstrate that the applicant's evaluation underestimates the significant visual, community and heritage effects on Iona, thereby compromising the accuracy of the environmental and social impact assessment.

The applicant's assessment recognises significant effects on several key areas of Mull and the Ross of Mull, notably the Ross of Mull South coastal area, which is identified as having High sensitivity at distances of approximately 22 to 24 kilometres, with a Medium magnitude of impact attributed. The assessment acknowledges significant effects at Erraid and on the Core Paths of the Ross, as well as at Fionnphort, the community serving as the gateway to Iona and the primary point of embarkation for visitors. This community is explicitly noted as being most directly linked to the flow of visitors, whose experience the applicant concedes would be significantly affected. Similarly, across Mull, significant effects are accepted on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is assessed as having High sensitivity throughout, at viewing distances between approximately 21 and 33 kilometres, yet only a Medium magnitude of impact is attributed. This suggests an underestimation of potential visual and experiential effects in sensitive, designated landscapes.

A further concern arises from the applicant's treatment of the Wilderness and Gribun Rocks coastal area, where the assessment relies heavily on distance-based reasoning, concluding that due to viewing distances exceeding 30 kilometres, the scale of change is small. Such reasoning fails to fully account for the qualitative importance of these landscapes and their coastal character to the local communities and tourism economy. Mull's west-facing tourism sector, including wildlife boat operators and accommodation providers in its western townships, depends fundamentally on the integrity of the Atlantic seascape, which the proposed development would industrialise. Notably, no place-based assessment has been undertaken for these communities, leaving a significant gap in understanding the cumulative visual, economic, and community impacts. This omission undermines the robustness of the applicant's conclusions and suggests the need for a more comprehensive and locally attuned evaluation of effects on Mull and the Ross of Mull coastal communities and landscapes.

The applicant's assessment acknowledges the presence of several designated landscapes within the wider seaboard area, including the Loch na Keal National Scenic Area and its constituent islands such as Ulva and Staffa. Ulva, a community-owned island within this National Scenic Area, is at the early stages of regeneration, relying heavily on its unspoilt seascape and setting for recovery. However, the assessment fails to address the specific effects on this small, re-establishing community, despite the fact that Ulva fully shares the effects on the designated landscape. Similarly, Staffa, renowned as one of the most celebrated small islands in Europe and situated approximately 35 kilometres from the development area, lies beyond the 30-kilometre boundary suggested by NatureScot for assessing effects on National Scenic Area qualities. The applicant concludes that the scale of change at Staffa would be small and not significant, notwithstanding its own acceptance of the island's panoramic maritime qualities.

The Jura National Scenic Area, located approximately 28 to 32 kilometres from the proposed development, is assessed as having high sensitivity but only medium to low magnitude effects attributed to distance, apparent scale, and retained landforms. This moderation, however, appears inconsistent with the designation's emphasis on the wild and undeveloped character of its Atlantic outlook. The same approach is applied to the Scarba, Lunga, and the Garvellachs National Scenic Area, situated roughly 35 to 40 kilometres away, where effects are similarly downplayed.

Taken together, these assessments suggest an underestimation or omission of significant effects on important designated landscapes and the vulnerable island communities that depend on their natural and cultural qualities. The failure to adequately evaluate impacts on Ulva's community and the minimisation of effects on other National Scenic Areas risk undermining the protection intended for these sensitive environments and their associated human settlements. A more thorough and nuanced consideration is therefore necessary to ensure the safeguarding of these valued landscapes and communities.

The applicant's Environmental Statement assesses the South Tiree coastal area, situated approximately 35 kilometres from the proposed development, as having High sensitivity but attributes a Low magnitude of change to the effects on this landscape. This combination underpins their overall evaluation of the impact on Tiree's coastal character.

However, Tiree's landscape is uniquely defined by its exceptionally low-lying topography, with the highest point, Ben Hynish, reaching only 141 metres. The island's character derives from the dominance of sea and sky and an open oceanic horizon. Introducing turbines of up to 335 metres in height would result in vertical elements unprecedented in the seascape. Such large-scale structures would fundamentally alter the visual and experiential qualities of the landscape.

Given this context, the conclusion of a Low magnitude of change appears to significantly understate the true extent of impact on Tiree's sensitive and distinctive landscape character. This understatement calls into question the reliability of the applicant's assessment, which fails to fully reflect the magnitude of change likely to be experienced by this highly sensitive receptor.

The applicant's assessment has overlooked significant effects on mainland and island communities that have direct visual and economic connections to the seascape in question. Notably, Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by residents, faces the development area from the east. Despite the island's finely balanced community and economy, the assessment fails to examine the impacts on Gigha, thereby omitting consideration of a key receptor intimately linked to the seascape.

Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the sensitive receptors to which the applicant's distance-based mitigation approach is applied, raising concerns about the validity of this method. Additionally, the chain of communities along the west coast of Kintyre, whose character and visitor economy depend on open Atlantic

seaboard views towards Islay, Jura, and surrounding waters, along with the Treshnish Isles and other small islands and mainland coasts overlooking the development site, have also been excluded from assessment. This omission undermines the comprehensiveness of the applicant's evaluation and leaves unaddressed potential adverse effects on these interconnected communities.

There remains considerable uncertainty surrounding the applicant's reliance on a distance-based methodology that applies systematic moderation and discounting of effects beyond approximately 20 kilometres. This approach inherently assumes that impacts diminish uniformly with distance, yet it fails to account for the nuanced and place-specific sensitivities of receptors located beyond this threshold. Such generalisation risks overlooking significant adverse effects that may persist or manifest differently at greater distances, thereby compromising the thoroughness of the environmental impact assessment.

Critically, as evidenced, the applicant's assessment effectively minimises the magnitude of change experienced by highly sensitive receptors beyond the 20-kilometre boundary, while neglecting to conduct any detailed place-based evaluation for the affected communities. This procedural omission undermines the integrity of the assessment process and its conclusions, leaving those communities without due consideration of the effects they endure. Consequently, the applicant's approach does not provide a robust or comprehensive appraisal of environmental impacts and should be re-examined to ensure all significant effects are properly identified and addressed.

1.1.689 Personal Observations

In addition to the planning matters above, I am personally concerned because: I am submitting this response as a resident and business operator with a direct, longstanding interest in Mull and Iona, and I object to the MachairWind proposal on the following grounds.
Direct personal and economic impact. I maintain established connections to this coastline, including a long-term horticultural interest and developing commercial plans for small-scale cultural and tourism-related activity in the area. These plans depend materially on the retained character of the surrounding seascape as undeveloped and unindustrialised. The introduction of up to 91 turbines of up to 340 metres in height, within approximately 13 miles of Iona and covering an area equivalent to over half the landmass of Mull, would constitute a permanent and irreversible alteration to the visual and environmental setting on which this economic activity depends. This represents a foreseeable and material financial detriment, not a speculative one.
Impact on designated and undesignated heritage assets. Iona is a site of recognised national and international religious, cultural, and historic significance, with a documented continuity of use spanning approximately fifteen centuries. The setting of a heritage asset is a material planning consideration, and the applicant's own consultation material to date includes only limited visual assessment (a single photomontage from Iona), using methodology that is widely understood to underrepresent the apparent scale of turbines of this height at this proximity. I submit that the visual and setting impact assessment currently before the Marine Directorate is inadequate to support a determination on a development of this scale and

sensitivity.
Cumulative community impact. A formal community consultation carried out by Iona Community Council found that 92% of participating households objected to the proposal, with 3% in support. This is not a marginal division of opinion but a near-unanimous community position, and I submit it should be treated as strong evidence of disproportionate local impact under any assessment of community benefit versus harm.
Economic base of the community. The local economy of Mull and Iona is substantially dependent on tourism generated by landscape and heritage value that this development would directly compromise. Any diminution in visitor numbers arising from adverse visual and environmental impact would have a direct and quantifiable effect on livelihoods across the community, including my own.
Conclusion. I do not object to renewable energy development in principle. However, I submit that the scale, height, and proximity to sensitive heritage sites proposed under MachairWind is disproportionate, that the environmental and visual impact assessment is currently insufficient to justify consent, and that the applicant should be required to consider reduced scale, reduced turbine height, or alternative siting before this application proceeds further.

Based on my own local knowledge, I also wish to highlight that: Yes. I submit that the following features have not received adequate weight in the applicant's assessment to date.
Protected and migratory bird populations. The waters and coastline around Mull, Iona and the wider Inner Hebrides support internationally significant seabird populations, including species with designated protection status. Offshore turbine arrays of this scale and height present recognised collision and displacement risks to seabirds, as well as barrier effects on migratory routes. I submit that cumulative ornithological impact — assessed in combination with other operational and consented offshore developments on the west coast — requires more rigorous and transparent survey data than has been made publicly available to date.
Marine ecology and protected habitats. The development area and surrounding waters support marine ecosystems of recognised conservation value, including seabed habitats and species sensitive to construction disturbance, subsea cabling, and long-term operational noise. I submit that baseline survey data and mitigation proposals for benthic and marine mammal impact should be subject to independent scrutiny before consent is considered.
Landscape and seascape character. The undeveloped character of the seascape to the south and west of Mull and Iona is, in itself, a landscape asset of national significance, contributing to the area's National Scenic Area status and its wider setting. This is not adequately captured by conventional visual impact methodology, which I submit underrepresents the perceived scale of turbines of this unprecedented height at this proximity to the coast. Greater weight should be given to seascape character assessment specific to this location, rather than generic offshore visual impact methodology developed for less sensitive sites.
Setting of Iona as a heritage and spiritual asset. As set out in my previous response, the significance of Iona derives not only from designated built heritage but from the integrity of its wider setting — the relationship between landscape, seascape, and centuries of continuous religious and cultural use. I submit this qualifies as a feature requiring specific and dedicated assessment, distinct from standard heritage impact methodology, given Iona's exceptional status.

Dark skies and tranquillity. The area's low levels of light pollution and background noise are a recognised part of its environmental and tourism value. Turbine lighting (required for aviation safety at this height) and associated vessel traffic during construction and maintenance would materially alter this, and I submit this has not been adequately addressed.
Community wellbeing and livelihoods. Beyond individual heritage or ecological features, I submit that the cumulative effect on community wellbeing — including the economic base derived from tourism, and the psychological and cultural value residents place on an unindustrialised coastline — should be treated as a material community feature in its own right, not merely a downstream consequence of other impacts.
I would ask that all of the above be subject to independent, rather than solely applicant-commissioned, assessment before any determination is made.

Finally, I would also ask the Scottish Ministers to consider: Yes. I would ask the Scottish Ministers to consider the following in reaching a determination.
Precedent and cumulative national impact. A consent decision on MachairWind will not be assessed in isolation by future developers or by the public. Approving turbines of unprecedented height (up to 340 metres, among the tallest proposed anywhere in the world) at close proximity to a nationally and internationally significant heritage site sets a precedent for the scale of development considered acceptable adjacent to Scotland's most sensitive coastal and cultural landscapes. I ask that Ministers weigh this precedent-setting effect explicitly, not merely the impacts of this application in isolation.
Proportionality between national energy policy and local irreversible harm. I recognise the Scottish Government's legitimate policy interest in expanding offshore renewable generation to meet net zero targets. However, I submit that policy support for renewable energy in general terms does not equate to a presumption in favour of any given site, scale, or turbine height. The harms identified in my previous responses — to heritage setting, landscape character, protected wildlife, and community wellbeing — are substantially irreversible for the operational lifetime of the project and beyond, whereas the shortfall in generating capacity from refusing or reducing this specific application is not similarly irreversible, since alternative sites, scales, or technologies remain available to meet the same policy objective. I ask that this asymmetry be given full weight.
Adequacy of consultation and evidence base. I submit that the applicant's consultation and environmental evidence base — including visual impact methodology, ornithological and marine survey data, and heritage setting assessment — should be independently verified before Ministers rely upon it, given the concerns raised by affected communities and the scale of what is being proposed. Where survey data is limited, dated, or applicant-commissioned without independent review, I ask that this be treated as a gap in the evidence base rather than resolved in the applicant's favour.
Weight to be given to near-unanimous community opposition. I ask that Ministers give substantial weight to the outcome of the Iona Community Council consultation, in which the overwhelming majority of participating households objected to this proposal. Community consent is not determinative of planning merit, but a result of this clarity is rare and should be treated as strong evidence that the proposal, as currently designed, is disproportionate to what the host community is willing to accept.

Alternatives not yet fully explored. Finally, I ask Ministers to consider whether the applicant has adequately demonstrated that a development of this scale, height, and proximity to Iona is necessary to meet the stated generating capacity, or whether reduced turbine numbers, reduced turbine height, or an alternative site further from designated heritage assets could achieve comparable policy benefit with materially less harm. I do not believe this has yet been demonstrated to the standard the scale of harm requires.
I would ask that this application not proceed to consent without these matters being fully and independently resolved.

1.1.690 Further Comments

No

1.1.691 Summary

The proposal before the Scottish Ministers fails to satisfy the relevant statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges considerable impacts upon nationally designated landscapes, as well as on the heritage and communities along this coastal region. However, a closer scrutiny of the submitted documents reveals that these significant effects have been underestimated. Crucially, the necessary heritage assessment has not been undertaken, and although impacts on the island communities have been identified, they remain unassessed. Furthermore, it has not been demonstrated that the ecological safeguards mandated by law can be complied with. Compounding these concerns, only a portion of the entire project is subject to the Ministers' consideration at this stage.

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

Should the Ministers consider not to refuse outright, it is requested that they require the submission of additional environmental information alongside enhanced visual representations of the development. Furthermore, it is proposed that the applications be determined only following a public inquiry, thereby allowing all objections and issues raised to be fully and properly examined. Regardless of the final decision, it is also sought that the Ministers clearly articulate their conclusions regarding the effects on cultural heritage and the impacted island communities within their formal reasons.

Yours faithfully,

[Redacted]

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

Member of the public 573
Dear Sir/Madam,

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

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

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

1.1.692 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989, which require the applicant to have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, as well as protecting sites, buildings, and objects of architectural, historic, or archaeological interest. This failure has practical consequences, as it undermines the statutory framework designed to safeguard these important environmental and heritage assets from adverse effects arising from development proposals.

Furthermore, the applicant has not shown that reasonable steps have been taken to mitigate any adverse impacts on these protected interests. The absence of adequate mitigation measures or evidence thereof indicates a significant omission in the application. This deficiency means that the proposal does not meet the legal requirements imposed on both the applicant and the Scottish Ministers, who must have regard to these duties when determining the application.

Given these shortcomings and the clear conflict with the applicable legal and policy framework, the application should be refused. Where compliance with Schedule 9 has not been demonstrated, and where evidence identifies such deficiencies and

omissions, these matters weigh decisively against the granting of consent under the Electricity Act 1989.

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

The evidence before the determining authority does not demonstrate compliance with these statutory requirements and relevant policies. Specifically, the application fails to provide sufficient evidence to satisfy the requirements of GEN 19 regarding sound evidence, and there are identified deficiencies and omissions in addressing cumulative impacts as required by GEN 21. Furthermore, the application does not adequately engage with the historic environment policies GEN 6 and GEN 7, nor does it properly address considerations related to natural heritage under GEN 9. The absence of demonstrated compliance with these policies constitutes a failure to meet the statutory framework established by the Marine (Scotland) Act 2010 and the National Marine Plan.

Given these deficiencies, omissions, and conflicts with the applicable legal and policy framework, the application does not meet the necessary statutory criteria. As such, these matters weigh decisively against the granting of consent for the marine licence.

The applicant's submission acknowledges that National Planning Framework 4 (NPF4) is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. The proposal engages several key policies within NPF4, specifically Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy). However, the evidence before the determining authority does not demonstrate compliance with these policies. Instead, it reveals deficiencies, omissions, and conflicts with the applicable legal and policy framework.

Policy 3 requires that development proposals protect and enhance biodiversity, ensuring no net loss and preferably net gain. The applicant has failed to provide sufficient evidence that the proposal will achieve these outcomes. There is a lack of comprehensive biodiversity assessment and no clear demonstration of how the proposal will avoid harm to protected species or habitats. This omission directly conflicts with the statutory duties to conserve biodiversity and the policy's explicit requirements.

Policy 4 mandates the protection and enhancement of natural places, including landscapes and ecosystems of national and local importance. The proposal's supporting documents do not adequately assess the impact on natural places, nor

do they propose measures to safeguard or enhance these areas. This failure to address the policy's requirements constitutes a material deficiency in the application.

Policy 7 concerns the protection of historic assets and places. The evidence submitted does not satisfactorily demonstrate that the proposal will preserve or enhance the character, setting, or significance of designated or undesignated heritage assets. The absence of a thorough heritage impact assessment and mitigation strategy conflicts with the statutory duty to protect historic environment interests and the policy's provisions.

Policy 11 relates to energy, requiring proposals to contribute to sustainable energy objectives and minimise adverse environmental impacts. The applicant has not provided adequate evidence that the proposal aligns with these objectives or complies with the policy's criteria. This omission represents a failure to meet the policy's requirements.

In summary, where compliance with NPF4 policies has not been demonstrated, and where the evidence identifies deficiencies, omissions, or conflicts with the applicable legal and policy framework, these matters weigh decisively against the granting of consent. The proposal's failure to satisfy the requirements of Policies 3, 4, 7, and 11 of NPF4 constitutes a fundamental breach of the statutory and policy framework governing this application. Consent should therefore be refused.

The applicant has failed to provide an adequate Environmental Impact Assessment (EIA) as required by The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations. These regulations mandate that the likely significant environmental effects of the proposal must be identified, assessed, and reported prior to any determination. The absence of a comprehensive and compliant EIA means that the decision-making process is not informed by a full understanding of the environmental consequences, contrary to statutory requirements.

Furthermore, the proposal does not satisfy the requirements of the Habitats Regulations, which require a thorough assessment of the effects on European protected sites in accordance with the applicable statutory tests. The evidence before the determining authority reveals deficiencies and omissions in demonstrating compliance with these legal obligations. Where such compliance has not been demonstrated, the law and policy framework dictate that these shortcomings must weigh against the granting of consent. Consequently, the proposal should be refused on the grounds of inadequate environmental and habitats impact assessment.

The applicant's submission does not demonstrate compliance with the requirements set out in the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be considered and given due weight during the decision-making process. The evidence confirms that where such compliance is not shown, or where deficiencies, omissions, or conflicts with the relevant legal and policy framework are identified, these factors must weigh against the granting of consent.

In this case, the proposal fails to properly consider and weigh the interests of island communities as required by the Act. There is a clear absence of evidence that the

decision-making process has adequately addressed these statutory obligations. This omission constitutes a significant procedural and substantive deficiency, undermining the legality and soundness of the proposal's assessment.

Accordingly, the failure to demonstrate compliance with the Islands (Scotland) Act 2018 and the associated evidential shortcomings weigh decisively against the approval of this application. Consent should not be granted in the absence of proper consideration and due weight being accorded to the interests of island communities as mandated by the statutory framework.

The applicant has failed to provide robust, objective, and proportionate evidence demonstrating compliance with every relevant statutory duty, planning policy, and environmental assessment requirement. This failure constitutes a fundamental breach of the evidential burden incumbent upon the applicant. The submitted documentation contains deficiencies and omissions that remain unaddressed, resulting in unresolved conflicts with the applicable legal and policy framework. Given that compliance has not been satisfactorily demonstrated, these shortcomings must weigh decisively against the granting of consent. In conclusion, the application does not meet the necessary evidential standards to satisfy legal and policy obligations and therefore should be refused.

1.1.693 Conflict with National Planning Framework 4 and the Development Plan

The proposal conflicts with the impact criteria set out in NPF4 Policy 11, thereby undermining the policy's intended support for renewable energy development. Although Policy 11 endorses such development, this support is conditional upon compliance with specific impact criteria, notably those addressing effects on communities (Policy 11(c)), and on landscape, seascape, and other receptors (Policies 11(d) and 11(e)).

In this case, the proposal would result in significant adverse effects on nationally designated landscapes and seascapes. Furthermore, it has not been satisfactorily demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, that island communities would be protected, or that the ecological requirements could be met based on the submitted evidence. These shortcomings indicate a clear conflict with the relevant provisions of Policy 11.

When compared to the mitigation measures required under Policies 4(c), 4(d), 7, and 3 of the National Planning Framework 4, the proposal falls short of adequately protecting the nationally important assets designated for their landscape, heritage, and biodiversity value. Policy 11 is intended to work alongside these policies to ensure significant adverse effects on National Scenic Areas, scheduled monuments, and biodiversity are avoided or suitably mitigated. However, the evidence demonstrates that the proposal would cause significant adverse effects on these designated landscapes and seascapes, without sufficient measures to prevent or offset such harm.

Furthermore, the submission has not satisfactorily demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, nor that the interests of island communities would be safeguarded. The ecological

requirements set out in Policy 3 remain unmet on the evidence provided. Taken together, these deficiencies establish clear conflict with the comprehensive suite of NPF4 policies designed to protect nationally important landscapes, heritage assets, and biodiversity. Consequently, the proposal cannot be considered compliant with the Framework's overarching aims for designated assets.

When considering the mitigation measures proposed, it is evident that they fall short in addressing the fundamental conflicts with the terrestrial development plan framework, particularly the Argyll and Bute Local Development Plan 2. This plan explicitly seeks to protect landscape, heritage, and community interests from adverse effects arising from development. The proposal, however, would result in detrimental impacts on these protected interests, indicating a clear inconsistency with the policies set out in the development plan. Despite the applicant's efforts, no convincing evidence has been presented to demonstrate that the proposal's effects can be sufficiently mitigated to align with these policy objectives.

Furthermore, this inconsistency with the Local Development Plan extends to a broader conflict with the National Planning Framework 4 when considered in its entirety. The applicant has not provided adequate justification or evidence to overcome this fundamental policy discordance. As a result, the proposal cannot be regarded as compliant with the relevant terrestrial development plan framework, reinforcing the position that it should not be supported in its current form.

1.1.694 Seascape, Landscape and Visual Effects

The applicant's assessment methodology notably lacks a defined distance threshold beyond which major effects are considered to cease, as stated in Appendix 16.1. Nonetheless, an independently prepared Evidence Note, which rigorously analyses the applicant's Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern across all three assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change. This pattern persists irrespective of the receptor's intrinsic sensitivity or the extent of its visibility. Such a finding indicates that the methodology implicitly diminishes the potential severity of effects at distances exceeding 20 kilometres, thereby raising significant concerns about the reliability of the predicted impacts upon sensitive receptors at these ranges.

Further scrutiny of the applicant's own documentation underscores the influence of distance on these judgements. For instance, the assessment of a coastal area situated over 30 kilometres from the development site explicitly states that, given the viewing distance, the scale of change is judged to be small. Moreover, the Landscape Character synthesis delineates a gradation of effect magnitude with distance: High magnitude effects are identified within approximately 20 kilometres, Medium effects between about 20 and 30 kilometres, and Low effects beyond approximately 30 kilometres for certain landscape types. This systematic moderation of magnitude at distances corresponding to the locations of the most sensitive designated landscapes results in protective tests being applied to understated inputs. Consequently, the conclusions presented do not reliably characterise the effects that the Scottish Ministers are asked to consent, thereby undermining the robustness and credibility of the applicant's assessment methodology.

The applicant's evidence draws on NatureScot's visualisation guidance, which acknowledges inherent limitations in the visual materials used to support the assessment. Specifically, the guidance recognises that printed visualisations cannot fully replicate the scale as perceived by a viewer on site. Furthermore, wireline drawings, which are presented within the same panoramic projections as the photographs, share the same constraints. These wireline drawings serve as a technical rendering within the visualisation rather than an independent corrective to photographic limitations. Consequently, while these visual materials provide a useful illustrative tool, they are inherently constrained and should be interpreted with an understanding of their technical and perceptual limitations.

The introduction of aviation and navigation lighting as part of the proposed development will permanently alter the character of the night-time seascape, which is currently unlit. This change will persist throughout the stated 35-year operational life of the project, fundamentally transforming the visual experience of the sea horizon after dark.

Beyond the immediate physical impact, the duration of the development's operational life does not diminish the policy implications of this harm. Consent for the project effectively signifies an acceptance that this particular seascape is appropriate for wind farm use, setting a precedent for how such areas are valued and protected within planning policy frameworks.

Given the permanent nature of the lighting effects and the broader policy message conveyed by approval, careful consideration must be given to whether this change to the night-time seascape aligns with the intended landscape protection objectives. The decision will have lasting consequences for the seascape's character and the interpretation of its suitability for similar developments in the future.

There remains significant uncertainty regarding the proposal's compliance with the suite of relevant planning policies designed to safeguard nationally important landscapes and seascapes. The effects identified engage specific provisions of the National Planning Framework 4, notably Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. Crucially, the applicant has failed to demonstrate that its assessment of the scale of these effects aligns with its own stated methodology. This lack of consistency undermines confidence in the conclusions reached and, consequently, in the assertion that the proposal adheres to the protections these policies afford. On this basis, it is concluded that the proposal does not comply with the key planning policies intended to protect the landscape and seascape interests at a national level.

1.1.695 Cultural Landscape, Archaeology and Historic Environment

There is considerable uncertainty surrounding the applicant's assessment methodology and its application in evaluating the impact on the setting of historic assets. Although the applicant asserts adherence to the recognised methodology developed by Historic Environment Scotland, concerns arise as to whether this approach has been properly followed in practice. This methodology explicitly requires an evaluation of how changes to setting affect the contribution that setting makes to the cultural significance of heritage assets, alongside an assessment of

whether the integrity of that setting is maintained. Importantly, it cautions against equating visual change directly with adverse impact, emphasising a more nuanced approach.

A detailed review of the applicant's operational assessment, particularly as documented in Appendix 14.3, reveals a focus on describing visual changes such as visibility, distance, monument prominence, retained views, screening, and skyline occupation. However, this review, presented in a published Methodological Audit prepared to support community objections, identifies a critical omission: the assessment does not demonstrate how the integrity of setting has been evaluated in line with the applicant's own accepted methodology. The essential evaluative step—determining whether the integrity of the setting is adequately retained—is not clearly evidenced in any of the examples examined by the Audit.

This lack of clarity and apparent methodological shortcoming undermines confidence in the reliability of the applicant's conclusions regarding heritage impacts. Without a transparent and rigorous demonstration that the integrity of setting has been properly assessed, the findings cannot be confidently accepted. It is therefore essential that this aspect of the assessment is revisited to ensure compliance with the recognised methodology and to provide a robust basis for decision-making on heritage matters.

The applicant's baseline assessment acknowledges that the cultural significance of the affected heritage assets extends beyond isolated physical features, encompassing a complex array of experiential qualities. These include the significance of pilgrimage routes, the historical arrival by sea, and the dynamic experience of movement through a living cultural landscape. The relationships between monuments, the spiritual associations they hold, and their integration within the surrounding landscape and seascape are central to the heritage value. Crucially, these elements are experienced not from fixed viewpoints but through continuous movement, highlighting the importance of understanding the heritage assets within their broader cultural and spatial context rather than as static or isolated features.

Historic Environment Scotland's consultation responses, as recorded within the application, reinforce this perspective by requesting additional viewpoints to ensure that these wider experiential and cultural qualities are fully represented. This indicates a recognition that the applicant's assessment, while comprehensive in certain respects, may not have adequately captured the full extent of the cultural landscape's significance. The omission of these wider viewpoints risks an incomplete understanding of how the heritage assets are perceived and valued in situ, potentially underrepresenting impacts on the cultural and spiritual dimensions integral to their heritage importance. In light of this, it is essential that any heritage impact assessment sufficiently encompasses these broader qualities to enable a fully informed planning decision.

The practical consequence of the identified deficiencies in the landscape assessment is that the conclusions drawn regarding heritage impacts cannot be regarded as fully reliable. This is because the heritage conclusions are directly dependent on the landscape assessment. Any understatement of landscape effects inevitably leads to a corresponding understatement in the assessment of heritage impacts.

It is therefore essential to recognise that if the landscape effects have been minimised or overlooked, the heritage assessment built upon these findings will inherit the same shortcomings. This interdependency means that the overall evaluation of the proposal's impact on heritage assets is compromised by the initial landscape analysis.

In light of this, the credibility of the heritage impact conclusions is fundamentally undermined. A robust and accurate landscape assessment is a prerequisite for a sound heritage impact appraisal, and without it, the conclusions presented must be treated with caution.

The application fails to comply with essential policy requirements concerning the protection of heritage assets. Specifically, it engages National Planning Framework 4 (NPF4) Policy 7(h) relating to scheduled monuments, alongside Policies 7(c) and 7(d) which address the setting of such assets, as well as Policy GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Critically, the applicant has not demonstrated that the cultural significance of internationally and nationally important heritage assets and their settings will be safeguarded. Furthermore, the Scottish Ministers have not been presented with the necessary assessment upon which such a conclusion would depend. Consequently, the proposal does not meet the statutory requirements for heritage protection and, therefore, cannot be regarded as acceptable in its current form.

1.1.696 Effects on Island Communities, Tourism and the Local Economy

The practical consequence of the proposed development is a direct threat to the fundamental economic and social sustainability of the island communities affected. These communities rely exceptionally heavily on visitors, whose presence underpins local businesses, services, and population stability. Any alteration to the qualities that draw visitors risks undermining the economic base upon which these islands depend.

The applicant's own baseline assessments identify the key attractions for visitors as the landscape, seascape, cultural heritage, tranquillity, and remoteness of the area. These elements are not peripheral; they constitute the very essence of what makes the islands appealing and viable as destinations. Diminishing or damaging these characteristics would inevitably lead to a decline in visitor numbers, with cascading effects on employment, local services, and community cohesion.

In summary, the proposal poses a significant risk to the viability of these island communities by threatening the qualities that sustain their visitor economy. Given the exceptional dependence of these islands on tourism drawn by these unique attributes, the development should be reconsidered to avoid jeopardising the long-term social and economic health of these communities.

The applicant's own consultants acknowledged that habitability constitutes a potentially significant pathway through which the proposal could impact island communities. Despite this, no assessment was undertaken to evaluate the habitability of the affected islands. Instead, the socio-economic assessment presented in Chapter 18 focuses primarily on regional-level analysis, detailing

potential impacts on port communities while omitting an equivalent, place-based examination of the island communities directly facing the development. This approach leads to the conclusion that these island communities exhibit low sensitivity to tourism effects, a finding reached without the benefit of targeted, location-specific analysis.

Such a conclusion fails to recognise the distinctive nature of small island economies, which are not adequately represented by regional averages. These economies are typically concentrated in sectors that are highly vulnerable to changes in the environmental and social qualities that attract visitors. Far from mitigating sensitivity, reliance on increasing visitor numbers intensifies dependence on these at-risk qualities. Therefore, the assertion of low sensitivity to tourism impacts, unsupported by detailed place-based assessment, amounts to an unsubstantiated assumption rather than evidence. This fundamental flaw undermines the robustness of the socio-economic assessment and calls into question the adequacy of the methodology to understand or mitigate the proposal's effects on island communities.

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

Moreover, the applicant has acknowledged that island communities warrant particular scrutiny but has failed to conduct the necessary assessment to understand the potential effects on these communities. There is no demonstrated evidence that the proposal is compatible with the principles of sustainable island communities, nor that the statutory duties owed to these communities have been adequately discharged. Given this shortfall, it is clear that the proposal does not meet the required standards for assessing and protecting island communities as mandated by current policy and legislation. Consequently, the proposal should not be approved in its current form.

1.1.697 Ecology, Biodiversity and Habitats Regulations

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

The proposed development would entail construction, operation, and decommissioning activities at a very large scale, persisting for decades. Such prolonged and extensive disturbance within this environmentally significant setting

presents a substantial potential for significant adverse effects on the protected species and habitats present.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically addressing the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are customarily prepared when an adverse effect on the integrity of a protected site cannot be definitively ruled out. Their submission constitutes a significant aspect of the application, acknowledging that, according to the applicant's own approach, Scottish Ministers may arrive at a different conclusion regarding potential adverse effects. This recognition underscores the applicant's awareness of the potential environmental impacts and their intent to address these through appropriate derogation provisions.

Developers must recognise that consent for projects potentially impacting protected habitats cannot be granted unless it is conclusively demonstrated that there will be no adverse effect on the integrity of the designated site. The legal framework, as established under the Habitats Regulations, imposes a high evidential threshold: consent is lawful only if no reasonable scientific doubt remains regarding the absence of harm. This places the onus squarely on the applicant to provide robust evidence. Importantly, proposals relying solely on mitigation, compensation measures, or future monitoring fail to satisfy these statutory requirements.

This strict approach is further reinforced by relevant planning policies, including GEN 9 and GEN 13 of the National Marine Plan, alongside NPF4 Policies 3, 4(b), 4(e), and 4(f). Together, these establish a comprehensive policy context that echoes the imperative of protecting sensitive habitats and species. Accordingly, any application must not only meet the legal criteria but also align with these policy standards to secure consent, underscoring the necessity for rigorous scientific evidence from the outset.

The evidence submitted by the applicant, including their own derogation documents, clearly indicates that they have not demonstrated compliance with the statutory tests required to protect internationally important habitats and species. This fundamental shortfall calls into question the validity of the application in its current form. Without satisfying these legal requirements, the protection of these critical ecological features cannot be assured.

Moreover, the degree of certainty necessary to ensure that adverse impacts will be avoided or mitigated has not been established. The statutory tests exist precisely to safeguard internationally important ecological assets, and failure to meet them undermines the integrity of the planning process. It is imperative that any proposal affecting such features demonstrates unequivocal compliance before consent is considered.

In light of these findings, it is clear that the application does not meet the legal thresholds set to protect internationally important ecological interests. Consequently, the case for granting planning consent is fundamentally undermined, and the application should not be approved.

1.1.698 Cumulative and In-Combination Effects

The current approach to assessing the project is fundamentally flawed because it only considers a portion of the development before the Scottish Ministers, while deferring critical components such as the export cable corridor and the onshore transmission works to later applications. These deferred elements are essential for the operation of the wind farm, yet their impacts are not evaluated alongside the principal works. This fragmented assessment results in the effects of the entire project never being examined collectively. Such piecemeal consideration undermines the integrity of the planning process and conflicts with established legal principles. Notably, the courts in Raeshaw Farms have affirmed that a project must be assessed in its entirety rather than being artificially divided into smaller parts to downplay the overall impact. Consequently, the current method of separating key elements into subsequent consenting processes after the main decision has been made is contrary to this principle. In summary, the incomplete project assessment arising from deferred elements is both legally and procedurally unsound, preventing a comprehensive evaluation of the project's full effects.

While mitigation measures are often highlighted to address environmental impacts, it is critical to scrutinise the reliability of the cumulative impact assessment itself. The assessment relies fundamentally on baseline data derived from the Environmental Impact Assessment, which has been shown to understate effects on landscape, heritage, and socio-economic factors. Because the cumulative assessment uses this reduced baseline, the combined effects of the current proposal alongside existing, consented, and foreseeable developments are similarly underestimated. Consequently, the cumulative impact assessment cannot be regarded as a reliable indicator of the true extent of combined effects, undermining confidence in its conclusions.

The applicant has failed to demonstrate that the cumulative and in-combination effects of the proposal, including the full scope of the project, have been reliably identified and assessed. This shortcoming is particularly significant given the potential for deferred works to contribute additional environmental impacts that remain unquantified and unconsidered. Such omission undermines the integrity of the environmental impact assessment and obscures the true scale of potential harm.

This failure constitutes non-compliance with established planning policies and regulatory frameworks, specifically engaging GEN 21 and paragraph 4.85 of the National Marine Plan, as well as NPF4 Policy 11(e). Furthermore, it contravenes the requirements of the Environmental Impact Assessment Regulations concerning project splitting, which mandate a comprehensive and integrated assessment of all components of a development to prevent piecemeal consideration that might understate cumulative effects.

In light of these concerns, it is imperative that the decision-making process explicitly addresses the treatment of deferred works to ensure a complete and transparent evaluation. Without this, there remains a material risk that significant environmental effects will be overlooked, justifying refusal of consent until such deficiencies are rectified.

1.1.699 Public Engagement, Site Selection and Environmental Information

The consultation process for this application has been markedly deficient in facilitating effective public participation, a shortfall that directly undermines the legitimacy of the site-selection process. The application itself comprises many thousands of pages of technical material, demanding considerable time and expertise to review. However, the consultation period was scheduled during the busiest months of the year for island communities, coinciding with the continuous work of residents throughout the visitor season. This timing severely limited the availability of specialist advice and constrained the capacity of those affected to engage meaningfully. In contrast, the applicant has had years to prepare, with substantial professional and financial resources at their disposal, creating a significant imbalance in the ability to participate fully and fairly.

The National Marine Plan's policy GEN 18, alongside the principles of effective public participation enshrined in the Aarhus Convention, mandates that affected parties be afforded a realistic opportunity to influence decisions of such magnitude. The conditions under which the local communities were required to respond fall short of this essential standard. This failure to ensure adequate participation not only diminishes the quality and fairness of the decision-making process but also calls into question the weight that Scottish Ministers can legitimately place on the site-selection process. It is therefore imperative that Ministers give careful consideration to these representational concerns when evaluating the application.

The Environmental Impact Assessment submitted in support of this application is insufficient for the Scottish Ministers to make an informed decision. While the assessment is extensive in scope, its adequacy is fundamentally compromised across several key topics. For example, the landscape assessment purports to identify significant effects but relies on a distance-based outcome pattern that its own methodology does not support. Similarly, the heritage assessment fails to demonstrate the application of its stated integrity test, undermining confidence in its conclusions. The socio-economic assessment is also deficient, notably lacking any place-based analysis of the islands directly affected by the proposal.

Moreover, the application frequently depends on future assessments, post-consent plans, monitoring regimes, and additional approvals to address matters that should be resolved at this stage. This approach conflicts with the requirements of the EIA Regulations, which mandate that likely significant environmental effects be fully understood prior to determination. The Scottish Ministers are bound to make their decision based on the evidence currently before them, not on the assumption that outstanding issues will be satisfactorily addressed later.

In light of these considerations, the applicant has not demonstrated that the environmental information provided is adequate for the purposes of determination. Therefore, the Environmental Impact Assessment as submitted fails to meet the necessary standards, and the application should not be approved on the basis of incomplete and insufficient environmental information.

1.1.700 Effects on Local Area

The applicant's mitigation measures fall short in adequately addressing the direct and significant effects on the communities of Islay, Colonsay, and Oronsay. While the development area extends over 448 square kilometres immediately north-west of Islay and west of Colonsay, the assessment treats Islay primarily as a potential project location rather than as a distinct island community with its own social and economic characteristics. This approach neglects a place-based evaluation of the impacts on Islay's Atlantic-facing communities, which are situated closest to the development boundary and whose daily lives and local economy are inextricably linked to their coastal setting. Consequently, the application's failure to assess how the development might alter the community's sense of place or economic wellbeing undermines the reliability of its environmental evaluation.

Similarly, for Colonsay and Oronsay, the environmental and heritage assessments inadequately consider the significance of the seaward outlook that defines daily life. The North Colonsay and Western Cliffs Special Protection Area, located on Colonsay's coastline, is at the centre of the applicant's derogation case and compensation plan, implicitly acknowledging that harm to the internationally protected seabird population cannot be ruled out. Moreover, Oronsay Priory, a scheduled monument of national importance within this community, is affected by gaps identified in the heritage assessment, particularly regarding the treatment of its open maritime setting. Taken together, these deficiencies demonstrate that the application underestimates the scale and nature of impacts on the local communities, economy, and heritage, calling into question the robustness of the overall environmental and heritage impact evaluation.

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

The heritage and community implications further reveal critical gaps in the assessment. Iona's monastic landscape, encompassing the Abbey, the Nunnery, and high crosses, holds international significance, intrinsically linked to pilgrimage and sea arrival routes, as identified in the applicant's baseline studies. Despite Historic Environment Scotland's requests for additional viewpoints, including from the ferry crossing itself, the applicant has not provided visualisations from key vantage points such as the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, thereby limiting the understanding of visual impacts on heritage assets.

Moreover, community consultation on Iona indicates overwhelming opposition, with 92 per cent of households objecting to the proposal. The applicant's own consultants identify habitability as a potential pathway of effect on the island's community, yet no assessment of this pathway has been undertaken. This omission further compromises the accuracy and completeness of the environmental and social impact evaluation, leading to an underrepresentation of the true scale and significance of effects on Iona.

The applicant's assessment acknowledges significant effects on several key locations within Mull and the Ross of Mull coastal communities. Specifically, the Ross of Mull South coastal area is identified as having High sensitivity at distances of approximately 22 to 24 kilometres, with an attributed Medium magnitude of effect. Significant impacts are recognised at Erraid and on the Core Paths of the Ross, while Fionnphort, serving as the gateway to Iona and the principal embarkation point for visitors, is explicitly accepted to experience significant effects. This community is notably reliant on the flow of visitors, highlighting the importance of understanding the development's influence on local dynamics.

Further across Mull, the applicant accepts significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Areas. The Loch na Keal National Scenic Area, which encompasses Mull's western waters and islands, is assessed as having High sensitivity throughout a range of approximately 21 to 33 kilometres. However, the magnitude of impact in this nationally designated landscape is attributed no more than Medium. This suggests a potential underestimation of the development's visual and environmental intrusion within an area of recognised scenic importance. The applicant's approach appears to downplay the extent of change, especially given the acknowledged sensitivity.

The assessment's treatment of the Wilderness and Gribun Rocks coastal area further exemplifies this concern. Here, the applicant judges the scale of change to be small due to a viewing distance exceeding 30 kilometres. This distance-based reasoning raises questions about the adequacy of the impact evaluation, particularly given that Mull's west-facing tourism economy, wildlife boat operations, and accommodation in western townships are intimately linked to the Atlantic seascape that would be industrialised by the development. Importantly, none of these communities have received a place-based assessment tailored to their specific contexts, which risks overlooking significant economic and social consequences. Taken together, these points suggest that the applicant's assessment does not fully capture the visual, economic, and community impacts on Mull and Ross of Mull, particularly in relation to designated landscapes and tourism-dependent communities.

The applicant's assessment of the impacts on wider seaboard designated landscapes and island communities appears to underestimate significant effects, particularly when compared to the mitigation standards typically applied to sensitive areas. For instance, Ulva, a community-owned island within the Loch na Keal National Scenic Area, is at the outset of its regeneration and relies heavily on the unspoilt seascape and setting, qualities that remain unassessed in the application despite being integral to the island's recovery. Similarly, Staffa, one of Europe's most celebrated small islands and also within the Loch na Keal National Scenic Area, lies

approximately 35 kilometres from the development. This exceeds the 30 kilometre assessment boundary suggested by NatureScot, yet the applicant concludes the effects there would be small and not significant, even though their own evaluation acknowledges the panoramic maritime qualities of the location.

Further, the Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed with High sensitivity at a distance of 28 to 32 kilometres but is attributed only Medium to Low magnitude of effect, justified by distance and retained landforms. This approach is similarly applied to the Scarba, Lunga and the Garvellachs National Scenic Area, situated approximately 35 to 40 kilometres away. Such treatment fails to adequately reflect the intrinsic qualities that underpin these designations. Taken together, these assessments omit the full extent of potential impacts on the natural and cultural qualities of these designated landscapes and the vulnerable island communities that depend on them, thereby undermining their protection and the integrity of the wider seaboard environment.

The applicant's assessment categorises the South Tiree coastal area as having High sensitivity at an approximate distance of 35 kilometres, yet concludes a Low magnitude of change resulting from the proposed development. This juxtaposition of high sensitivity with low impact magnitude appears incongruous, particularly given the distinctive environmental context of Tiree. The island's exceptional low-lying topography, with its highest elevation at Ben Hynish reaching only 141 metres, underpins a landscape character dominated by expansive sea and sky. Such a setting is inherently sensitive to vertical intrusions.

Given that the proposed turbines would reach heights of up to 335 metres, more than twice the island's highest natural point, their introduction would constitute a profound alteration to Tiree's open oceanic horizon. This scale of vertical structure is without precedent in the seascape and, accordingly, the applicant's conclusion of a Low magnitude of change does not adequately capture the likely visual and experiential impacts. The assessment thus significantly understates the magnitude of change and impact on Tiree's sensitive and distinctive landscape character, leading to an unreliable evaluation of effects.

The applicant's assessment fails to address significant effects on mainland and island communities that have direct views of, and economic reliance upon, the seascape affected by the development, thereby undermining the comprehensiveness of the evaluation. Notably, Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by residents, faces the development waters from the east; yet, no examination has been made of the potential impacts on its delicate community balance and economy. Similarly, Ardnamurchan Point—the most westerly point of the British mainland—offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas represent precisely the receptors for which the applicant's distance-based moderation has been applied in this objection, calling into question the adequacy of the assessment. Additionally, the west coast of Kintyre comprises a sequence of communities whose character, outlook, and visitor economy are defined by their exposure to the open Atlantic seaboard towards Islay, Jura, and adjacent waters. The Treshnish Isles and other small islands and mainland coasts with views toward the development area share this position and have similarly

been omitted from consideration. In light of these unassessed effects on key coastal and island communities, the applicant's assessment cannot be regarded as comprehensive or sufficiently robust.

The applicant's assessment methodology employs a distance-based approach which systematically moderates the magnitude of change and discounts the effects on sensitive receptors located beyond approximately 20 kilometres. As noted in the submitted evidence, wherever the assessment encounters a highly sensitive receptor beyond this threshold, the effect is diminished in significance, despite the presence of such receptors. This approach results in an absence of place-based evaluation for the communities affected at these greater distances, thereby overlooking localized impacts that may be considerable.

This systematic moderation undermines the integrity of the environmental impact assessment by failing to fully account for the potential effects on distant but sensitive receptors. The reliance on a rigid distance criterion to reduce the perceived magnitude of change does not reflect the nuanced realities experienced by affected communities, who have received no tailored or specific assessment of the impacts they face. Consequently, the assessment does not provide a comprehensive or accurate appraisal of environmental effects beyond 20 kilometres, calling into question the robustness of its conclusions and the adequacy of the mitigation measures proposed.

1.1.701 Personal Observations

In addition to the planning matters above, I am personally concerned because: The proposal will significantly damage local communities and the heritage landscape. Also affecting the local economy in a devastating way as most is tied to tourism. The turbines would drastically affect the islands tranquil nature.

Based on my own local knowledge, I also wish to highlight that: Removal of animal habitats and wider impact on local ecology.

Finally, I would also ask the Scottish Ministers to consider: These islands are of immense importance to Christianity not just in the British Isles but globally and to drastically alter their character in this way would be a permanent stain on our nations heritage and something future generations will judge us harshly for.

1.1.702 Summary

The proposal for the MachairWind Offshore Wind Farm has not satisfactorily demonstrated compliance with the relevant statutory and policy frameworks governing its determination. The applicant's own assessments acknowledge significant impacts on nationally designated landscapes, as well as on the heritage and communities of this coastal region. Moreover, published analyses of the applicant's documentation reveal that the magnitude of these impacts has been understated. Crucially, the mandatory heritage assessment has not been undertaken, and although the effects on the island communities involved were identified, they were never subjected to proper evaluation. The ecological requirements set out by law have also not been demonstrated as achievable. In

addition, it is important to note that only a portion of the overall project is currently presented for consideration by the Scottish Ministers.

In light of these substantial deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm proposal, as well as to decline the associated marine licence application. Should the Ministers be inclined to grant approval, I request that they require the submission of further environmental information alongside enhanced visual representations of the development. Furthermore, I recommend that the applications be determined only following a public inquiry, which would allow a thorough examination of the issues raised in this objection. Regardless of the outcome, I also ask that the Ministers explicitly address the effects of the proposal on cultural heritage and the impacted island communities within their decision-making rationale.

Yours faithfully,

[Redacted]

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

Member of the public 574
Dear Sir/Madam,

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

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

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

1.1.703 Seascape, Landscape and Visual Effects

While the applicant acknowledges certain effects on landscape and seascape interests, it has failed to demonstrate that these effects have been adequately mitigated in accordance with relevant policy requirements. Specifically, these effects engage National Planning Framework 4 (NPF4) Policies 4(c) and 4(d), 11(d) and 11(e), alongside Policy GEN 7 and paragraph 4.28 of the National Marine Plan. Despite this, the applicant has not shown that its conclusions regarding the scale of these accepted effects align with its own stated methodology. Consequently, compliance with policies designed to protect nationally important landscapes and seascapes remains unproven, undermining the proposal’s conformity with the established planning framework.

1.1.704 Cultural Landscape, Archaeology and Historic Environment

The assessment submitted by the applicant fails to demonstrate adherence to the required methodology for evaluating the effects on the setting of historic assets, thereby calling into question the reliability of its conclusions regarding heritage impacts. Although the applicant adopts Historic Environment Scotland’s recognised approach—developed and refined through consultation with that body—which

mandates an evaluation of whether changes to setting affect the contribution setting makes to cultural significance and whether the integrity of setting is adequately retained, the assessment does not satisfy these requirements. Notably, the methodology explicitly states that visual change alone should not be equated directly with adverse impact, underscoring the need for a nuanced evaluative process.

A Methodological Audit prepared to support community objections, relying entirely on the applicant's Appendix 14.3, confirms that while the operational assessment identifies relevant heritage attributes, it does not clearly demonstrate how the integrity of setting has been assessed in accordance with the applicant's own accepted methodology. The assessment primarily describes visual changes such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, before concluding that the integrity of setting remains adequately retained. However, this critical evaluative step—central to the adopted methodology—is absent in all the worked examples examined by the Audit. This omission undermines confidence in the assessment's findings and raises serious concerns about its overall robustness in relation to heritage impacts.

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

1.1.705 Effects on Island Communities, Tourism and the Local Economy

The proposed development's potential impacts cannot be adequately mitigated without fundamentally altering the qualities that attract visitors to the island communities in question. While mitigation measures might address isolated effects, they fail to preserve the intrinsic landscape, seascape, cultural heritage, tranquillity, and remoteness that underpin the visitor appeal. The applicant's own baseline assessments confirm these attributes as critical to the islands' character and visitor experience, thereby limiting the effectiveness of any partial or compensatory mitigation.

These qualities form the foundation of the island communities' economic and social sustainability. The exceptional dependence on visitors means that any change to these attributes directly undermines the local economy, which supports essential

services, population retention, and long-term community viability. Consequently, the proposal represents a fundamental threat to the islands' continued existence as vibrant, sustainable communities rather than an impact that mitigation can suitably address.

1.1.706 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, with the surrounding waters providing habitat for seabirds, marine mammals, and basking sharks. The proposed project would introduce construction, operational, and decommissioning activities into this ecologically sensitive environment on a very large scale and over several decades. Given the presence of these protected species and habitats, the potential for significant adverse environmental effects is considerable, necessitating careful assessment and mitigation measures to safeguard the ecological integrity of the site and its marine surroundings.

1.1.707 Public Engagement, Site Selection and Environmental Information

The consultation process associated with this application has demonstrable deficiencies that undermine effective public participation, thereby calling into question the legitimacy of the site-selection process. The applicant requests that Scottish Ministers place significant weight on the site-selection exercise; consequently, the quality of public involvement at this stage is directly material to the decision. These deficiencies, evident during both the plan and site-selection stages, have persisted into the application phase. Notably, the application documentation comprises many thousands of pages of complex technical material. The consultation period coincided with the busiest months for island communities, during which residents are continuously engaged in work throughout the visitor season and access to specialist advice is limited. This timing contrasts with the applicant's extended preparation period, supported by substantial professional and financial resources. Under GEN 18 of the National Marine Plan and the principles of effective public participation enshrined in the Aarhus Convention, those affected must have a realistic opportunity to engage in decisions of this magnitude. The conditions imposed on the affected communities have fallen short of this standard, and it is imperative that Ministers bear this firmly in mind when weighing the representations submitted.

There remains significant uncertainty as to whether the environmental information provided is sufficient for the Scottish Ministers to make a fully informed decision on this application. Although the Environmental Impact Assessment (EIA) is extensive, its adequacy is questionable. The application identifies potential significant effects but fails to investigate them comprehensively or applies methodologies inconsistently. For example, the landscape assessment relies on distance-based outcomes not supported by its own methodology; the heritage assessment does not properly apply its stated integrity test; and the socio-economic assessment lacks any place-based analysis of the affected islands. Furthermore, the reliance on future assessments, post-consent plans, monitoring, and additional approvals does not satisfy the EIA Regulations' requirement that likely significant effects must be understood before determination. It is imperative that the Scottish Ministers base their decision on the evidence currently before them, not on assumptions that

outstanding matters will be satisfactorily resolved later. On this basis, the applicant has not demonstrated that the environmental information submitted is adequate, and the application should not be approved in its present form.

1.1.708 Effects on Local Area

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

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

While the applicant's assessment recognises some visual and community effects on Iona, it nonetheless underestimates their scale and significance when compared to established mitigation standards for sensitive landscapes and communities. The Coastal Character assessment attributes a High sensitivity to the Sound of Iona, noting its direct orientation towards the development, extensive visibility, and a large geographical extent of change. The turbines would be visible across approximately 21 kilometres and extend over 39 degrees of the horizon, producing a Moderate and Significant overall effect. Similarly, the West Coast of Iona is identified as highly sensitive with widespread visibility. The applicant accepts significant effects for residents and visitors across much of the island, including at Dùn Ì, the highest point, yet fails to adequately address the implications of these impacts.

Furthermore, Iona's monastic landscape, comprising internationally important heritage assets such as the Abbey, the Nunnery, and the high crosses, is intrinsically linked to pilgrimage, arrival by sea, and movement through the landscape. Despite Historic Environment Scotland's request for additional viewpoints—including from the ferry crossing itself—the applicant has not provided visualisations from key vantage

points such as the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn. This omission undermines a full understanding of the heritage impact. Community concerns are also profound; a household consultation found that 92 per cent of respondents object to the proposal. Importantly, the applicant's own consultants identified habitability as a potential pathway of effect on the Iona community, yet no assessment of this factor has been undertaken.

To contextualise the visual scale, the largest turbines would overtop Ben Hynish on Tiree—a familiar landmark 141 metres in height and visible from Iona at about 33 kilometres—by approximately 194 metres, despite being situated at roughly two-thirds of that distance. Taken together, these factors indicate that the applicant's evaluation significantly understates the visual, community, and heritage impacts on Iona, thereby compromising the accuracy of the environmental and social impact appraisal.

The applicant's assessment acknowledges significant effects on several key areas within Mull and the Ross of Mull coastal communities and landscapes. Specifically, the Ross of Mull South coastal area is identified as having high sensitivity at distances of approximately 22 to 24 kilometres, with the applicant attributing a medium magnitude of effect. Significant impacts are accepted at Erraid and on the Core Paths of the Ross, while Fionnphort—recognised as the gateway to Iona and the embarkation point for the crossing—is acknowledged to experience significant effects. This community is notably the most directly connected to the flow of visitors, underscoring its vulnerability to change.

Across the wider island of Mull, the applicant admits to significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Areas. The Loch na Keal National Scenic Area, which encompasses Mull's western waters and islands, is assessed as having high sensitivity throughout at distances ranging from approximately 21 to 33 kilometres. Despite this, the magnitude of impact is again limited to medium. This suggests a disparity between the sensitivity of the landscape and the scale of attributed effects, potentially understating the true extent of the development's influence.

Further illustrating this concern is the treatment of the Wilderness and Gribun Rocks coastal area, where the applicant's assessment relies heavily on distance to justify a small scale of change, given that viewing distances exceed 30 kilometres. This approach exemplifies a distance-based reasoning that may fail to capture the qualitative and experiential aspects of visual and landscape impacts, particularly in areas of acknowledged high sensitivity.

Moreover, Mull's west-facing tourism economy, including its wildlife boat operations and accommodation sectors within its western townships, is intrinsically linked to the unindustrialised Atlantic seascape. The proposed development would industrialise this seascape, yet the applicant's assessment does not provide any place-based evaluation of the effects on these communities that depend on this setting. This omission raises concerns regarding the adequacy of the assessment in reflecting the economic and social ramifications for tourism-dependent communities.

In conclusion, while the applicant recognises significant effects in various designated landscapes and communities on Mull and the Ross of Mull, the assessment's reliance on distance to moderate perceived impacts, the limited magnitude attributed despite high sensitivity, and the lack of place-based analysis for key tourism-dependent communities collectively suggest that the visual, economic, and community impacts are not fully or appropriately addressed. This gap indicates a need for more comprehensive and locally nuanced evaluation to ensure these significant effects are properly understood and mitigated.

The applicant's assessment fails to account adequately for the practical consequences of the proposed development on vulnerable island communities and wider designated landscapes. For example, Ulva, situated within the Loch na Keal National Scenic Area, is a community-owned island embarking on regeneration. Its recovery is inherently dependent on the unspoilt seascape and setting that the development threatens, yet no specific assessment of effects on Ulva has been undertaken. This omission overlooks the critical link between the community's viability and the preservation of the natural qualities that define its environment.

Similarly, the assessment underestimates impacts on renowned designated landscapes such as Staffa, the Jura, and the Scarba, Lunga and Garvellachs National Scenic Areas. Staffa lies approximately 35 kilometres from the development site, beyond the 30-kilometre range NatureScot advised for assessing effects on National Scenic Area qualities. Despite recognising the island's panoramic maritime qualities, the applicant concludes that changes there would be small and not significant. The Jura National Scenic Area, assessed at 28 to 32 kilometres distance, is rated as having high sensitivity but attributed only medium to low magnitude effects, justified by distance and retained landforms, though its designation explicitly depends on the wild, undeveloped Atlantic outlook. The Scarba, Lunga and Garvellachs National Scenic Area, 35 to 40 kilometres away, is treated similarly. These conclusions appear to underplay the significance of the development's effects on landscapes whose designations rest on precisely the qualities at risk.

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

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

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

The applicant’s assessment fails to consider significant effects on mainland and island communities that have direct visual and economic connections to the seascape in question. Notably, Gigha, a community-owned island emblematic of island regeneration, faces the development from the east, yet the potential impacts on its delicate community balance and economy remain unexplored. Similarly, Ardnamurchan Point—the most westerly tip of the British mainland—offers panoramic views along the Hebridean seaboard, attracting visitors whose experience depends on the unspoiled seaward panoramas. These receptors, critical to the local visitor economy, appear to be dismissed through a distance-based moderation approach. Furthermore, the west coast of Kintyre encompasses a series of communities whose identity and tourism are closely tied to the open Atlantic seaboard views towards Islay, Jura, and adjacent waters. The Treshnish Isles and other small islands and mainland coasts with sightlines to the development area share this vulnerability. The omission of these communities from thorough assessment undermines the comprehensiveness and reliability of the applicant’s environmental evaluation.

1.1.709 Personal Observations

In addition to the planning matters above, I am personally concerned because: Iona is steeped in history and an integral part of Scotland's history. Scotland's beauty and history are what makes it a place visitors flock to, bringing welcome revenue. Changing the landscape would affect it adversely by detracting from its beauty and authenticity.

Based on my own local knowledge, I also wish to highlight that: The landscape and birds the make Iona home.

Finally, I would also ask the Scottish Ministers to consider: Scotland's landscapes deserve protection for future generations!

1.1.710 Summary

The proposal for the MachairWind Offshore Wind Farm fails to meet the statutory and policy requirements applicable to its determination. The applicant’s own evaluation acknowledges significant impacts on nationally designated landscapes as well as on the coastal communities and their heritage. Moreover, published analyses of the applicant’s documents reveal that the magnitude of these impacts has been underestimated. Crucially, the necessary heritage assessment has not been conducted. The identified effects on the impacted island communities remain unassessed, and the ecological criteria required by law have not been demonstrated as achievable. Additionally, the Scottish Ministers are only being asked to consider a portion of the overall project.

In light of these deficiencies, it is respectfully urged that the Scottish Ministers refuse the consent sought for the MachairWind Offshore Wind Farm and decline the associated marine licence. Should the Ministers consider granting consent, it is further requested that additional environmental information and enhanced visual representations be provided. Furthermore, the applications ought to be determined only after the holding of a public inquiry, allowing for a thorough examination of the concerns raised in this objection.

Regardless of the outcome, it is also requested that the Ministers explicitly address and document their conclusions regarding the effects on cultural heritage and the island communities affected by the proposal within their decision rationale.

Yours faithfully,

[Redacted]

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

Member of the public 575
Dear Sir/Madam,

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

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

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

1.1.711 Legislative and Policy Framework

The proposal fails to meet the fundamental legal requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations, which mandate that the likely significant environmental effects of any development must be thoroughly identified, assessed, and reported prior to determination. The absence of a comprehensive and compliant Environmental Impact Assessment (EIA) in this case represents a critical procedural and substantive deficiency. Without this essential assessment, the decision-making authority is deprived of the necessary evidence to understand the full scope and scale of environmental consequences, thereby undermining the statutory framework designed to safeguard environmental interests. This failure to provide an adequate EIA is not a minor oversight but a fundamental breach of the statutory process, which must weigh decisively against the granting of consent.

Furthermore, the proposal does not satisfy the requirements of the Habitats Regulations, which impose a clear duty to assess the effects of the development on European protected sites in accordance with the applicable statutory tests. The absence of a demonstrable Habitats Regulations Assessment (HRA) or any evidence that these statutory tests have been properly applied constitutes a significant omission and legal non-compliance. Given the stringent protections afforded to European sites, any uncertainty or failure to demonstrate compliance with

these regulations is a matter of serious concern. As established by the approved evidence, where compliance with the Habitats Regulations has not been demonstrated, or where deficiencies and omissions are evident, these factors must be regarded as material considerations against the proposal. In this instance, the lack of adequate assessment and failure to meet statutory obligations unequivocally justify refusal of consent.

The proposal fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be properly considered and given due weight in the decision-making process. This statutory obligation is clear and unambiguous, yet the submitted documentation does not provide adequate evidence that these interests have been sufficiently identified, assessed, or integrated into the planning evaluation. The absence of such consideration represents a significant procedural deficiency.

Moreover, the evidence before the determining authority reveals omissions and shortcomings in addressing the specific needs and circumstances of island communities as required by the Act. These deficiencies undermine the integrity of the decision-making process and conflict with the applicable legal and policy framework. Where compliance with the Islands (Scotland) Act 2018 has not been demonstrated, the legislation explicitly directs that such failures must weigh against the granting of consent.

In light of these factors, the proposal cannot be regarded as meeting the statutory tests set out by the Islands (Scotland) Act 2018. The failure to properly consider and give due weight to the interests of island communities constitutes a material flaw that should result in the refusal of planning permission. The decision-making process must uphold the legal protections afforded to island communities, which this proposal does not satisfy.

The practical consequence of the applicant’s failure to discharge the evidential burden of proof is that the application cannot be considered compliant with the relevant legal and policy requirements, thereby undermining the basis for granting planning consent. It is a fundamental principle that the applicant must demonstrate, by means of robust, objective, and proportionate evidence, that every applicable statutory duty, planning policy, and environmental assessment requirement has been fully satisfied. This responsibility is not discretionary but mandatory, ensuring that decision-makers have a clear and reliable evidential foundation upon which to assess the proposal’s lawfulness and policy conformity.

In this case, the applicant has not met this essential evidential standard. The submitted documentation and supporting evidence fail to establish compliance with all relevant legal and policy frameworks. There are identifiable deficiencies and omissions within the evidence presented, which have not been adequately addressed or remedied. Moreover, certain aspects of the proposal conflict with statutory duties and planning policies, as evidenced by the absence of demonstrable conformity in the applicant’s submissions. These shortcomings are material and substantive, directly impacting the integrity of the planning assessment process.

The absence of comprehensive and convincing evidence to prove compliance means that the application falls short of the statutory and policy requirements that govern the planning system. As established in the approved evidence, where compliance has not been demonstrated, or where evidence reveals deficiencies, omissions, or conflicts with the applicable legal and policy framework, these factors must weigh decisively against the granting of consent. The applicant's failure to provide the necessary evidential assurance precludes the possibility of lawful approval.

In conclusion, the applicant has not fulfilled the requisite evidential burden to demonstrate compliance with all relevant statutory duties, planning policies, and environmental assessment obligations. This failure constitutes a fundamental flaw in the application, which, in accordance with established legal and policy principles, necessitates refusal of planning permission.

1.1.712 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to comply with the impact criteria set out in NPF4 Policy 11, thereby undermining the policy's support for renewable energy development. Specifically, it would result in significant adverse effects on nationally designated landscapes and seascapes. Furthermore, it has not been demonstrated that the cultural significance of scheduled monuments and their settings would be adequately protected. Additionally, the proposal does not show that island communities would be safeguarded, nor has it been established that the ecological requirements can be met based on the evidence provided. NPF4 Policy 11 supports renewable energy development only insofar as these impact criteria—including those addressing effects on communities and on landscape, seascape, and other receptors—are satisfied. The failure to meet these tests means the proposal conflicts with the policy's provisions and cannot be regarded as compliant.

The proposal must be assessed in the context of several interrelated policies within NPF4 that collectively seek to safeguard nationally important landscapes, heritage assets, and biodiversity. Policy 11 functions alongside Policy 4(c) and 4(d), which specifically protect National Scenic Areas and nationally important landscapes from significant adverse effects on their designated qualities. Furthermore, Policy 7 addresses the protection of scheduled monuments, particularly through Policy 7(h), and includes provisions concerning the settings of historic assets under Policies 7(c) and 7(d). Policy 3 complements these protections by establishing requirements for the conservation and enhancement of biodiversity.

In light of the evidence presented, the proposal conflicts with these critical policies. It would result in significant adverse effects on nationally designated landscapes and seascapes, undermining the very qualities for which these areas are protected. Moreover, the submission has not satisfactorily demonstrated that the cultural significance of scheduled monuments and their settings would be preserved. There is also a failure to show that island communities, which often rely on the integrity of their natural and historic environments, would be adequately safeguarded by the development. This lack of demonstration raises substantial concerns regarding compliance with the policies aimed at heritage and community protection.

Finally, the ecological requirements set out under Policy 3 have not been evidenced as being capable of fulfillment based on the materials submitted. Without convincing evidence that the ecological tests can be met, the proposal remains contrary to the biodiversity objectives enshrined in NPF4. Taken together, these shortcomings indicate that the proposal does not comply with the suite of policies designed to protect designated assets at the national level, and as such, the proposal should be reconsidered in light of these significant policy conflicts.

The applicant's evidence confirms that the proposal would have adverse effects on the landscape, heritage, and community interests safeguarded by the terrestrial development plan, including the Argyll and Bute Local Development Plan 2. These impacts are material to the land-based effects under consideration and directly conflict with the policies set out within that plan.

Consequently, the proposal is inconsistent with the overall development plan framework and with National Planning Framework 4 when considered in its entirety. The applicant has failed to demonstrate that these conflicts can be overcome, thereby reinforcing the conclusion that the proposal does not accord with the relevant planning policies.

1.1.713 Seascape, Landscape and Visual Effects

The practical consequence of the applicant's assessment methodology is that it systematically underestimates the magnitude of landscape and visual effects at distances where the most sensitive designated landscapes are located. Despite the absence of any explicit distance threshold in the applicant's Appendix 16.1 beyond which major effects cease, the evidence demonstrates a consistent pattern across all three streams of assessment: no highly sensitive receptor beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of its inherent sensitivity or the extent of visibility. This pattern indicates an implicit distance-based moderation that is not transparently acknowledged in the methodology.

The applicant's own documentation further confirms the influence of distance in shaping judgements of effect magnitude. For example, an assessment of a coastal area over 30 kilometres away qualifies the scale of change as small, explicitly citing the viewing distance as a key factor. Similarly, the Landscape Character synthesis categorises magnitude as High within approximately 20 kilometres, Medium between roughly 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. These distance thresholds, while not formally stated in the methodology, effectively constrain the recognition of significant effects at greater distances, where important landscape receptors are situated.

As a result, the protective tests applied in the assessment process are based on understated inputs. By moderating magnitude values at distances coinciding with the location of the most sensitive designated landscapes, the conclusions drawn cannot be regarded as a reliable or accurate reflection of the true effects the Scottish Ministers are being asked to consider. This calls into question the robustness of the applicant's methodology and the validity of its predicted outcomes, undermining confidence in the decision-making process.

The practical consequence of relying on the submitted visualisation materials is that they do not fully convey the true scale and impact of the proposed development as experienced on site. NatureScot's visualisation guidance, which the applicant follows, explicitly recognises that printed visualisations cannot replicate the scale perceived by a viewer in the field. Furthermore, the wireline drawings included within the same panoramic views share the inherent limitations of the photographs they accompany; these drawings are technical renderings within the visualisation rather than independent tools to correct or enhance the visual accuracy. Therefore, while the materials offer a useful indication of appearance, they should be treated with caution and not be regarded as definitive representations of visual impact.

The applicant's evidence acknowledges that the proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration to the character of the night-time seascape over the stated 35-year operational lifespan. This change would be a novel feature in an environment that has, until now, been characterised by natural darkness, thereby affecting the visual experience of the area during night-time hours.

It is also noted that the 35-year operational period does not represent a limit on the potential harm in policy terms. The decision to grant consent for this development would effectively amount to a determination that this particular seascape is suitable for wind farm use. Such a decision carries significant weight, as it establishes a precedent regarding the acceptability of lighting effects and their impact on the character of the night-time environment.

In balancing these considerations, it is important to recognise the lasting implications of introducing permanent lighting into an unlit seascape, alongside the policy recognition that consent equates to suitability for wind farm development in this location. Any assessment of the proposal must therefore carefully weigh the visual and character impacts against the broader policy framework governing offshore wind farm siting.

The proposal fails to comply with key planning policies designed to safeguard landscape and seascape interests. Specifically, the effects of the development engage National Planning Framework 4 (NPF4) Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. The applicant has not demonstrated that its conclusions regarding the scale of these acknowledged effects align with its own established methodology. Furthermore, there is no evidence to show that the proposal meets the requirements of the policies protecting nationally important landscapes and seascapes. On this basis, the proposal does not accord with the relevant policy framework and should be refused.

1.1.714 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of the proposed development's impact on the setting of historic assets does not fully comply with the recognised methodology established by Historic Environment Scotland. While the applicant claims to have adopted this methodology, which necessitates evaluating whether changes to setting affect its contribution to the cultural significance of heritage assets and whether the integrity of that setting is adequately retained, the assessment fails to demonstrate this critical

evaluative step. Notably, the methodology explicitly states that visual change should not be directly equated with adverse impact, yet the applicant's analysis appears to overlook this distinction.

A detailed Methodological Audit, prepared in support of community objections and based solely on the applicant's Appendix 14.3, reveals that although the assessment identifies relevant heritage attributes such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it stops short of showing how the integrity of setting has been assessed in accordance with the applicant's own accepted methodology. The Audit finds that the assessment merely describes visual changes and then asserts that the integrity of setting is adequately retained without providing the necessary evaluative reasoning. This omission undermines the reliability of the applicant's conclusions regarding heritage impacts and calls into question the robustness of the assessment overall.

The practical consequence of relying on a limited assessment of heritage impacts is that the full cultural significance of the affected assets may be overlooked, leading to an incomplete understanding of potential harm. The applicant's baseline acknowledges that this significance arises from dynamic qualities such as pilgrimage routes, arrival by sea, and movement through a living cultural landscape. These aspects emphasize the relationships between monuments, spirituality, and the surrounding landscape and seascape, which are experienced sequentially rather than from static viewpoints.

However, the applicant's assessment appears insufficient to capture these experiential qualities fully. Historic Environment Scotland, whose consultation responses are included in the application, highlighted this shortcoming by requesting additional viewpoints. Their intention was to ensure that the broader cultural landscape and the intangible connections between heritage assets would be adequately represented and assessed.

In light of these concerns, it is essential that the assessment process incorporates a comprehensive evaluation of the heritage assets' cultural significance, reflecting their dynamic and interconnected nature. Without such an approach, the appraisal risks undervaluing the heritage impacts, potentially undermining the effectiveness of any proposed mitigation measures.

The application fails to demonstrate compliance with essential policy provisions designed to protect heritage assets, notably those set out in NPF4 Policy 7(h) concerning scheduled monuments, as well as Policies 7(c) and 7(d) relating to their setting, alongside GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Critically, the applicant has not provided evidence that the cultural significance of internationally and nationally important heritage assets and their settings will be safeguarded. Consequently, the Scottish Ministers have not been presented with the necessary assessment to reach a reasoned conclusion on this matter. In light of this absence of demonstrable protection and assessment, the application does not meet key policy requirements for heritage protection and thus cannot be considered acceptable.

1.1.715 Effects on Island Communities, Tourism and the Local Economy

The proposed development poses a significant threat to the fundamental economic and social sustainability of the island communities affected. These communities rely exceptionally heavily on visitors, who are attracted by the very qualities identified in the applicant's own baselines: landscape, seascape, cultural heritage, tranquillity and remoteness. Any alteration to these attributes would directly undermine the economic foundation of these communities.

Such an impact would extend beyond immediate economic concerns, jeopardising the provision of local services, the retention of populations and ultimately the long-term viability of these island communities. The proposal therefore risks destabilising the delicate balance upon which these communities depend and should be carefully reconsidered in light of these vulnerabilities.

While mitigation measures may address some regional impacts, the applicant's socio-economic assessment fundamentally fails to capture the unique vulnerabilities of island communities. The applicant's own consultants acknowledged habitability as a potentially significant pathway for adverse effects on these communities, yet no specific assessment of island habitability was undertaken. Instead, Chapter 18 confines its analysis to a regional scale, focusing on port communities with detailed scrutiny, while neglecting an equivalent place-based evaluation of the islands directly facing the development. Despite this omission, the assessment concludes that these island communities possess low sensitivity to tourism effects—an assertion unsupported by focused analysis. In reality, small island economies diverge markedly from regional averages; their economic activity is heavily concentrated in sectors intimately tied to the qualities attracting visitors. Far from diminishing vulnerability, dependence on increasing visitor numbers intensifies sensitivity to any threats to these qualities. Consequently, the conclusion of low sensitivity rests not on evidence but on unexamined assumption, undermining the reliability of the socio-economic assessment and its capacity to inform appropriate mitigation for island communities.

The applicant acknowledges that island communities warrant specific and careful consideration within the planning process. However, the evidence demonstrates a failure to undertake the necessary assessment to understand the proposal's effects on these communities. This omission runs counter to the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions affecting marine and coastal environments be based on robust socio-economic evidence and apply a precautionary approach when such evidence is lacking. Furthermore, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 impose statutory obligations to assess and accord weight to the interests of island communities through meaningful engagement from the earliest stages of a proposal through to its conclusion.

In light of this, the proposal has not demonstrated compatibility with the sustainable development of island communities, nor has it satisfied the statutory duties owed to these populations. Without evidence that meaningful engagement has occurred or that the socio-economic impacts have been thoroughly evaluated, the decision-making process fails to align with established policy and statutory frameworks. Accordingly, the proposal cannot be considered compliant with the necessary standards for the protection and promotion of island community interests.

1.1.716 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, placing highly sensitive ecological assets directly within the zone of proposed activity. Surrounding waters are also known to support a range of protected species, including seabirds, marine mammals, and basking sharks, which rely on these habitats for feeding, breeding, and migratory pathways. The scale of the proposal is substantial, involving construction, operation, and eventual decommissioning phases extending over several decades, thereby introducing prolonged and potentially cumulative pressures on these environmentally critical components.

Given the ecological significance of the site and adjacent marine environment, the introduction of large-scale industrial activity raises serious concerns regarding adverse environmental effects. The presence of Priority Marine Features within the development footprint, coupled with the usage of surrounding waters by protected species, underscores the need for rigorous assessment and mitigation strategies. Without such measures, the proposal risks causing substantial harm to habitats and species of national and international importance, undermining biodiversity objectives and statutory conservation priorities.

The practical consequence of the applicant's submission of a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan is that it implicitly acknowledges the possibility of adverse impacts on the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are specifically prepared for circumstances in which an adverse effect on the integrity of a protected site cannot be definitively ruled out. Their inclusion within the application therefore signals the applicant's recognition that mitigation measures alone may not suffice to prevent harm, necessitating recourse to derogation provisions.

Moreover, the submission of such documents constitutes a significant feature of the application process, as it indicates that the Scottish Ministers may reach a different conclusion from the applicant regarding the presence or absence of adverse effects on the protected site. This suggests a level of uncertainty or dispute about the environmental impacts, reinforcing the importance of careful scrutiny of the proposed compensation measures. While the applicant has taken steps to address potential effects, the reliance on derogation documentation highlights the need for thorough assessment to ensure that the integrity of the Special Protection Area is not compromised.

Consent for developments affecting protected habitats and species can only be granted where there is no reasonable scientific doubt that the integrity of the protected site will remain unaffected. Under the Habitats Regulations, the competent authority must be satisfied that the proposal will not adversely affect the site's integrity, except where strict derogation tests are conclusively met. This places a very high evidential burden on the applicant to demonstrate compliance. Importantly, measures such as mitigation, compensation proposals, or future monitoring alone do not suffice to meet the statutory tests. This stringent legal framework is reinforced by specific policy provisions, including GEN 9 and GEN 13 of the National Marine Plan, alongside Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4.

Given these requirements, any consent granted without unequivocal scientific certainty that the protected site’s integrity will remain intact would be unlawful. Therefore, proposals must be rigorously assessed against these standards before any approval is considered.

The applicant has failed to demonstrate that the statutory tests intended to protect internationally important habitats and species can be satisfied. This conclusion is drawn directly from the submitted evidence, including the applicant’s own derogation documents, which reveal an insufficient degree of certainty regarding compliance with these legal requirements. Without clear assurance that the necessary protections will be met, the application falls short of the statutory standards designed to safeguard ecological features of international significance, thereby undermining any case for granting planning consent.

1.1.717 Cumulative and In-Combination Effects

The current assessment approach is fundamentally flawed as it fails to evaluate the project in its entirety, contrary to established legal principles. Only a portion of the development is presently before the Scottish Ministers, with critical components such as the export cable corridor and onshore transmission works deferred to future applications. These elements are indispensable for the wind farm’s operation, yet their environmental and cumulative effects are excluded from the principal decision-making process. This segmentation results in a fragmented evaluation, preventing a comprehensive understanding of the project's overall impact. Such an approach conflicts with the principle upheld in Raeshaw Farms, where the courts emphasised that projects must be assessed holistically rather than divided into smaller parts whose individual impacts might appear less significant. Consequently, the current methodology undermines the integrity of the assessment and should be reconsidered to ensure a complete and lawful evaluation of all project elements.

The practical consequence of relying on flawed baseline assessments is that the cumulative impact assessment fails to provide a reliable account of the true combined effects of the proposed development alongside other existing, consented, and foreseeable projects. This undermines the ability of decision-makers to fully understand the scale and significance of the overall impact on the environment and local communities.

This unreliability stems from the cumulative assessments depending directly on conclusions drawn in the Environmental Impact Assessment (EIA), particularly those relating to landscape, heritage, and socio-economic factors. When these underlying assessments understate effects, as demonstrated elsewhere, the cumulative assessment necessarily begins from a diminished baseline. Consequently, the aggregated effects presented do not reflect the actual extent of harm or change that would result from the cumulative development scenario.

It follows that the cumulative impact assessment cannot be regarded as a sound basis for planning decisions. Without an accurate baseline, the combined effects of this proposal and other developments are consistently underestimated, risking inadequate mitigation and management measures. A thorough reassessment is

essential to ensure that the cumulative impacts are fully and fairly evaluated in line with statutory requirements.

The applicant's submission fails to meet the requirements set out in GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the Environmental Impact Assessment Regulations concerning project splitting. Unlike a comprehensive assessment that would encompass all related works, including deferred elements, the current approach does not reliably identify or evaluate the cumulative and in-combination effects of the proposal in its entirety. This omission undermines the ability to compare and consider appropriate mitigation measures effectively across the full scope of the project.

Given this deficiency, it is essential that the decision-making process explicitly addresses the treatment of the deferred works to ensure compliance with policy and regulatory frameworks. Without such consideration, the potential environmental impacts may be underestimated, leading to insufficient mitigation and an incomplete understanding of the proposal's overall effects. Accordingly, the application as submitted does not satisfy the necessary standards for environmental assessment and planning policy adherence.

1.1.718 Effects on Local Area

The applicant's assessment fails to adequately recognise and address the direct and significant impacts that the proposed development would have on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby undermining the reliability of the overall environmental and heritage impact evaluation. Islay and Colonsay are the nearest inhabited islands to the development site, which extends over a 448 square kilometre area immediately north-west of Islay and west of Colonsay. Yet, the application primarily considers Islay only in terms of its potential as a direct project location rather than as a community likely to experience substantial effects. Notably, Islay's Atlantic-facing communities confront the closest edge of the development area, but there is no place-based assessment of how this proximity might affect their setting, local economy, or community life.

In relation to Colonsay and Oronsay, the seaward outlook, which is integral to daily life and identity, directly faces the proposed array. The North Colonsay and Western Cliffs Special Protection Area, part of Colonsay's own coastline, is central to the applicant's derogation case and compensation plan. This area represents the clearest recognition within the application that harm to an internationally protected seabird population associated with these cliffs cannot be ruled out. Moreover, Oronsay Priory, a scheduled monument of national importance situated within this community, has its open maritime setting insufficiently addressed. The previously identified deficiencies in the heritage assessment apply fully to this feature, further highlighting the inadequacy of the appraisal of impacts on local heritage assets.

Given these considerations, the applicant's evaluation does not provide a comprehensive or reliable account of the effects on these island communities and their significant environmental and cultural receptors. This underassessment risks overlooking adverse consequences that would be materially relevant to planning

decisions, and as such, the assessment should be revisited to ensure that the impacts on Islay, Colonsay, and Oronsay are properly and fully accounted for.

The applicant's Coastal Character assessment recognises the Sound of Iona as an area of high sensitivity, noting its direct orientation towards the proposed development, extensive visibility, and a large geographical extent of change. The assessment quantifies the overall effect as moderate and significant, with visibility extending approximately 21 kilometres and turbines occupying around 39 degrees of the horizon. This finding is consistent with the high sensitivity attributed to the west coast of Iona, where widespread visibility is similarly acknowledged. The applicant concedes that significant effects will be experienced by residents and visitors across much of the island, including at Dùn Ì, the island's highest point.

Despite these acknowledgements, the assessment falls short in fully capturing the scale and significance of the impacts on Iona's internationally important monastic landscape. The Abbey, the Nunnery, and the high crosses are central to the heritage value of the island, with their significance closely tied to pilgrimage, arrival by sea, and movement through the landscape as established in the applicant's own baseline evidence. Historic Environment Scotland's request for additional viewpoints, including from the ferry crossing between Fionnphort and Iona, was not comprehensively addressed; notably, no visualisation is provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, a location of particular heritage relevance.

Community concerns further underscore the gravity of the potential impacts. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal. The applicant's own consultants identify habitability as a potential pathway of effect on the community, yet this crucial aspect was never assessed, leaving a significant gap in the social impact evaluation. The perceived scale of the development can be further contextualised by comparison with a familiar local landmark: Ben Hynish on Tiree, standing at 141 metres and visible from Iona at approximately 33 kilometres, would be dwarfed by the largest turbines, which would exceed Ben Hynish's height by around 194 metres and be located at roughly two-thirds of that distance.

In summary, while the applicant recognises some significant effects on Iona, the assessment underestimates the extent and importance of visual, community, and heritage impacts. This results in an incomplete and potentially misleading environmental and social impact evaluation, which must be addressed to ensure that the full implications for Iona are properly understood and mitigated.

The practical consequence of the applicant's assessment is a significant underestimation of the visual and community impacts on Mull and the Ross of Mull coastal areas, which are integral to the region's tourism economy. The Ross of Mull South coastal area, recognised for its High sensitivity at distances of 22 to 24 kilometres, is attributed only a Medium magnitude of effect, despite the applicant accepting significant impacts at Erraid and on the Core Paths of the Ross. Notably, Fionnphort, the gateway to Iona and primary embarkation point for visitors, is acknowledged as experiencing significant effects, yet the broader community implications bound to the flow of visitors remain inadequately addressed. Similarly,

across Mull, significant effects on Core Paths and within the Central, South and West Mull Local Landscape Area are accepted, and the Loch na Keal National Scenic Area, a designation of High sensitivity at approximately 21 to 33 kilometres, is attributed no more than Medium magnitude. This disparity suggests a disconnect between recognised sensitivity and the scale of attributed effects, potentially diminishing the perceived impact on these tourism-dependent communities and landscapes.

Further illustrating the limitations of the assessment is the treatment of the Wilderness and Gribun Rocks coastal area, where the applicant's reliance on viewing distance—over 30 kilometres—is used to justify judging the scale of change as small. This distance-based reasoning fails to adequately reflect the qualitative and economic significance of the landscape, particularly given the dependence of Mull's west-facing tourism economy on the Atlantic seascape. Wildlife boat operations and the accommodation infrastructure supporting western townships would be affected by the industrialisation of these seascapes, yet none of these communities have been afforded a place-based assessment. This omission undermines a comprehensive understanding of the development's impact, risking adverse consequences for both the landscape character and the economic vitality of these coastal communities.

The applicant's assessment of the wider seaboard designated landscapes and island communities results in practical consequences that risk undermining the protection of their essential natural and cultural qualities. Notably, Ulva, situated within the Loch na Keal National Scenic Area, is a community-owned island undergoing a critical phase of regeneration. This small, re-establishing community depends fundamentally on the unspoilt seascape and setting at stake, yet the applicant has failed to provide any assessment of the potential effects on Ulva. The absence of consideration for such a vulnerable community raises concerns about the adequacy of the overall evaluation and the safeguarding of the island's recovery prospects.

Further scrutiny reveals that other significant designated landscapes, despite their acknowledged sensitivities, are similarly underestimated. Staffa, also within the Loch na Keal National Scenic Area and renowned as one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development area—beyond the 30 kilometre threshold advised by NatureScot for assessing National Scenic Area effects. The applicant nonetheless concludes that the scale of change on Staffa would be small and not significant, despite recognising its panoramic maritime qualities. Similarly, the Jura National Scenic Area, located around 28 to 32 kilometres away, is assigned High sensitivity but only Medium to Low magnitude of effect, justified by distance and retained landforms, even though its designation is founded on its wild, undeveloped Atlantic outlook. The Scarba, Lunga and the Garvellachs National Scenic Area, at 35 to 40 kilometres distance, receives comparable treatment. These assessments collectively suggest that significant effects on these important landscapes may be overlooked, thereby diminishing the protection of their distinctive character and the integrity of the island communities that rely on them.

The applicant's assessment significantly understates the magnitude of change and impact on Tiree's sensitive and distinctive landscape character, resulting in an

unreliable evaluation of effects. Specifically, the South Tiree coastal area, which lies approximately 35 kilometres from the proposed development, is classified as having High sensitivity. Despite this, the applicant attributes only a Low magnitude of change to this receptor. This is inconsistent with the nature of Tiree's landscape, which is exceptionally low-lying and defined by the dominance of sea and sky. The island's highest point, Ben Hynish, rises merely 141 metres. In this context, turbines reaching up to 335 metres would introduce vertical structures unprecedented in Tiree's seascape, disrupting the open oceanic horizon that is fundamental to its character. Given this exposure and sensitivity, a Low magnitude conclusion is clearly a severe understatement, undermining the credibility of the overall impact assessment.

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

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

Moreover, the chain of communities along the west coast of Kintyre, whose character, outlook, and visitor economy are intimately tied to the open Atlantic seaboard facing Islay, Jura, and adjacent waters, has also been overlooked. This oversight extends to the Treshnish Isles and other small islands and mainland coasts with views toward the development area, all of which share a similarly direct visual and economic relationship to the seascape. Collectively, these omissions indicate that the assessment does not fully account for the breadth of receptors potentially affected, thus compromising its overall robustness and reliability.

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

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

kilometre threshold, the assessment does not provide a reliable basis for decision-making.

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

1.1.719 Personal Observations

In addition to the planning matters above, I am personally concerned because: These are wild areas which are the heritage of my children. Once they are gone they are gone. This is not an appropriate site. Further more, I do not see what benefits this development will bring.

1.1.720 Summary

The proposal for the MachairWind Offshore Wind Farm fails to demonstrate compliance with the relevant statutory and policy frameworks governing its determination. The applicant's own assessments acknowledge significant adverse impacts on nationally designated landscapes, as well as on the coastal communities and heritage assets. However, published analyses of their documentation reveal that these impacts have been understated. Notably, the essential heritage assessment has not been undertaken, while the effects on the island communities impacted by the development have been identified but never subjected to proper evaluation. In addition, the ecological criteria required by law have not been demonstrated as capable of being satisfied. It is also of concern that only a portion of the project is currently presented for consideration by the Scottish Ministers.

Given these deficiencies, it is respectfully urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm and decline to grant the associated marine licence.

Should the Ministers be inclined not to refuse outright, it is requested that they require the submission of further environmental information alongside enhanced visualisations. Any determination should be deferred until after a public inquiry, thereby allowing a thorough examination of the issues raised in this objection. Furthermore, it is essential that the Ministers explicitly address and state their conclusions regarding the impacts on cultural heritage and the affected island communities in their decision, regardless of the outcome.

Yours faithfully,

[Redacted]

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

Member of the public 576
Dear Sir/Madam,

Please stop! This is going to destroy so much!

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

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

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

1.1.721 Seascape, Landscape and Visual Effects

There is a fundamental uncertainty regarding the applicant’s assessment methodology, particularly in relation to how distance thresholds are treated. Notably, the written methodology in Appendix 16.1 does not specify any distance beyond which major effects are considered to cease. However, an independently prepared Evidence Note, drawing solely from the applicant’s Chapter 16 and its appendices, reveals a consistent pattern: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of its sensitivity or visibility.

Further examination of the applicant’s own documents underscores the influence distance has on their judgements. For instance, an assessment of a coastal area over 30 kilometres away explicitly states that, given the viewing distance, the scale of change is judged to be small. Additionally, the Landscape Character synthesis categorises magnitude of effect as High within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. This demonstrates a clear, though implicit, distance-related grading of impact severity.

The implication of this approach is that the protective tests required by Scottish Ministers are being applied to inputs that are systematically understated. When magnitude is moderated precisely at distances where the most sensitive designated landscapes are located, the resulting conclusions cannot be regarded as a reliable description of the effects for which consent is sought. This raises significant concerns about the robustness and accuracy of the assessment on which the decision-making process depends.

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

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

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

1.1.722 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment employs the methodology recognised by Historic Environment Scotland for evaluating effects on the setting of historic assets. This approach, developed in consultation with Historic Environment Scotland, mandates an evaluation that goes beyond mere visual change, focusing instead on whether alterations to setting affect the contribution setting makes to the cultural significance of heritage assets and whether the integrity of setting is maintained. It explicitly cautions against equating visual change directly with adverse impact, emphasising a nuanced, evaluative process.

However, an independent Methodological Audit, conducted in response to community objections and relying solely on the applicant's Appendix 14.3, identifies a significant deficiency in the applicant's operational assessment. While the assessment successfully identifies relevant heritage attributes such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it fails to demonstrate how the integrity of setting has been evaluated in accordance with the prescribed methodology. Instead, the assessment primarily describes visual changes and then asserts that the integrity of setting is adequately retained without undertaking the necessary evaluative step. This omission undermines the reliability of the conclusions drawn about heritage impacts and calls into question the robustness of the overall assessment.

1.1.723 Effects on Island Communities, Tourism and the Local Economy

There is significant uncertainty regarding the potential impact of the proposed development on the fundamental qualities that attract visitors to the island communities in question. The applicant's own baseline assessments identify key attributes such as landscape, seascape, cultural heritage, tranquillity, and remoteness as central to the visitor experience. Any alteration to these characteristics raises serious doubts about the continued appeal of the area as a destination.

These qualities are not merely aesthetic or incidental; they underpin the economic foundation of the island communities. The exceptional dependence on visitor-generated income means that changes affecting these attributes could directly undermine local businesses, employment opportunities, and the provision of essential services. This economic fragility, in turn, poses risks to the broader social fabric and demographic stability of the islands.

Consequently, the proposal threatens the long-term viability of these communities by jeopardising the very qualities upon which their sustainability relies. Given the clear linkage between the visitor-attracted characteristics and the islands' economic and social wellbeing, careful reconsideration is necessary before any development proceeds.

There remains significant uncertainty regarding the adequacy of the applicant's socio-economic assessment methodology, particularly in its treatment of island communities directly affected by the proposal. While the applicant's own consultants have acknowledged habitability as a potentially significant pathway of impact, no specific assessment of island habitability was undertaken. Instead, Chapter 18 of the socio-economic assessment adopts a regional approach that focuses on port communities, neglecting a detailed, place-based evaluation of the island communities themselves. Despite this omission, the assessment nonetheless concludes that these island communities exhibit low sensitivity to tourism effects, a conclusion that appears unsupported given the absence of targeted analysis.

This methodological shortcoming is critical given the unique economic characteristics of small island communities. Their economies are not reflective of regional averages but are concentrated in sectors highly vulnerable to changes in the qualities that attract visitors. Moreover, their reliance on increasing visitor numbers serves not to

mitigate sensitivity but rather to deepen dependence on the very environmental and social qualities potentially at risk from the proposal. Therefore, to assert low sensitivity without a rigorous, place-specific assessment is to rely on assumption rather than evidence. Such uncertainty fundamentally undermines confidence in the applicant's conclusions and suggests that the socio-economic impacts on island communities have not been adequately understood or mitigated.

1.1.724 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, while the adjacent waters provide habitat for seabirds, marine mammals, and basking sharks. The proposed project would entail construction, operation, and decommissioning activities on a very large scale, persisting over several decades, thereby introducing significant and prolonged disturbance to this ecologically sensitive environment.

Given the presence of these designated and protected marine features and species, the proposal raises considerable concerns regarding its potential to cause substantial adverse environmental effects. The ecological importance and sensitivity of the site and surrounding waters necessitate rigorous assessment to ensure that the integrity of these habitats and species populations is maintained.

In considering the applicant's approach to addressing potential adverse effects on protected sites, it is notable that they have submitted both a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan. These documents specifically target the guillemot population within the North Colonsay and Western Cliffs Special Protection Area, reflecting a recognition that the proposed development may pose risks to this designated habitat. Such submissions are conventionally prepared in circumstances where it cannot be definitively ruled out that the integrity of a protected site may be compromised, indicating a precautionary stance on the part of the applicant.

The presence of these documents within the application package serves as a significant feature, underscoring the applicant's awareness of the complexities involved in securing consent where protected species and sites are concerned. Importantly, these plans are framed as "Without Prejudice," suggesting that the applicant does not concede an adverse effect but acknowledges the possibility that the Scottish Ministers might assess the situation differently. This cautious approach allows for the consideration of derogation provisions under relevant conservation legislation, which permit certain actions that might otherwise be prohibited, provided that appropriate compensation measures are implemented to offset any harm.

While the submission of derogation and compensation plans demonstrates a proactive attempt to mitigate potential impacts, it also raises questions about the certainty of the applicant's conclusions regarding adverse effects. The reliance on such documents reflects an understanding that the planning authority may not concur with the applicant's assessment of no significant harm. Consequently, these submissions should be carefully scrutinised to ensure that any proposed compensation is adequate, enforceable, and capable of maintaining the overall integrity of the protected area. It remains essential that the planning decision fully

weighs these considerations in determining whether the application can be granted without undermining the conservation objectives of the site.

While mitigation, compensation measures, and future monitoring are often proposed to address potential impacts on protected habitats, these alone do not satisfy the stringent legal requirements set out under the Habitats Regulations. Consent for developments affecting such sites can only be lawfully granted where the competent authority is assured that the proposal will not adversely affect the integrity of the protected site, and no reasonable scientific doubt remains. This high evidential standard places the burden firmly on the applicant to demonstrate compliance, rather than relying solely on mitigation proposals. This framework is reinforced by relevant policies, including GEN 9 and GEN 13 of the National Marine Plan, alongside NPF4 Policies 3, 4(b), 4(e), and 4(f), which collectively emphasize the necessity for robust scientific certainty before consent can be given. In light of these clear legal and policy imperatives, any development proposals must rigorously meet these standards to secure lawful consent.

The assessment of the submitted evidence, notably the applicant's own derogation documentation, reveals a fundamental failure to satisfy the statutory tests designed to protect internationally important habitats and species. This lack of demonstrable compliance undermines the legal safeguards intended to prevent harm to these ecological features. Consequently, the application does not meet the required legal standards, thereby weakening the justification for granting consent.

1.1.725 Cumulative and In-Combination Effects

The current assessment before the Scottish Ministers addresses only a portion of the proposed development, explicitly excluding the export cable corridor and the onshore transmission works that are essential for the wind farm's operation. This partial submission results in a fragmented evaluation whereby the cumulative effects of the entire project are never considered in a single, comprehensive review. The deferred elements will be subject to separate consenting processes subsequent to the principal decision, thereby precluding a holistic appraisal of the project's environmental and operational impacts at the critical initial stage.

Such an approach is fundamentally at odds with established legal principles, notably those upheld by the courts in Raeshaw Farms, which require that a project be assessed in its entirety rather than segmented into smaller components with individually diminished apparent effects. By permitting the project to be effectively "salami-sliced," the decision-making process risks underestimating the true scale and significance of the development's impacts. This fragmented methodology undermines the integrity of the planning assessment and fails to provide a robust basis for informed determination, thereby rendering the current approach legally and procedurally flawed.

The applicant has failed to demonstrate that the cumulative and in-combination effects of the proposal, including the deferred works, have been reliably identified and assessed, contrary to the requirements set out in GEN 21 and paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the Environmental Impact Assessment Regulations concerning project splitting. This omission undermines

compliance with relevant planning policies and environmental regulations. Consequently, it is essential that the decision-making process expressly addresses the treatment of the deferred works to ensure a comprehensive and lawful assessment. Without this, the application remains incomplete and cannot be properly determined.

1.1.726 Public Engagement, Site Selection and Environmental Information

There is considerable uncertainty as to whether the consultation process associated with this application has met the essential standards of effective public participation. The applicant invites Scottish Ministers to place significant weight on the site-selection process, yet the deficiencies in public engagement observed at both the plan and site-selection stages have persisted into the current application phase. Given that the application comprises many thousands of pages of technical material, the scale and complexity of the documentation have further complicated meaningful engagement.

Compounding this difficulty, the consultation period coincided with the busiest months of the year for island communities, when residents are engaged continuously throughout the visitor season and access to specialist advice is notably limited. This timing has inevitably constrained the ability of those affected to provide considered and informed responses. In contrast, the applicant has had years to prepare its case, supported by substantial professional and financial resources, thereby creating an imbalance in the consultation process.

Under GEN 18 of the National Marine Plan and the principles enshrined in the Aarhus Convention, it is imperative that those affected by decisions of this magnitude are afforded a realistic opportunity to participate. The conditions under which the communities have been required to respond fall short of this benchmark. It is therefore respectfully urged that Ministers bear these concerns firmly in mind when considering the representations made, recognising the potential implications for the legitimacy of the site-selection process.

There remains considerable uncertainty regarding the adequacy of the Environmental Impact Assessment submitted with this application. While the EIA is extensive in scope, its sufficiency is questionable, as it identifies pathways to significant effects without fully investigating them or relying on methodologies that fail to support its conclusions. Notably, the landscape assessment applies an outcome based on distance patterns absent from its own methodology, the heritage assessment does not evidence the application of its stated integrity test, and the socio-economic assessment omits any place-based analysis of the affected islands. Such deficiencies undermine confidence in the EIA’s ability to provide a comprehensive understanding of likely significant effects.

Furthermore, the application’s reliance on future assessments, post-consent plans, monitoring, and additional approvals runs counter to the requirements of the EIA Regulations, which mandate that likely significant effects be understood prior to determination. The Scottish Ministers must base their decision on the evidence presently before them, not on assumptions that unresolved issues will be satisfactorily addressed at a later stage. In this case, the applicant has not

demonstrated that the environmental information submitted is adequate to support an informed decision, and accordingly, the application should not be approved.

1.1.727 Effects on Local Area

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

For Colonsay and Oronsay, the situation is particularly acute as the seaward outlook that shapes everyday life directly faces the proposed array. The North Colonsay and Western Cliffs Special Protection Area, which forms Colonsay's coastline, is central to the applicant's derogation case and compensation plan, highlighting an admission that harm to the internationally protected seabird population cannot be ruled out. This clearly signifies substantial environmental risks to the local ecology that are insufficiently addressed in the current assessment.

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

The applicant's assessment underestimates the scale and significance of the visual, community, and heritage impacts on Iona, leading to an incomplete evaluation of environmental and social effects. The Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity, with direct orientation towards the development, extensive visibility, and a large geographical extent of change. The turbines would be visible across approximately 21 kilometres, spanning around 39 degrees of the horizon, significantly affecting the ferry crossing between Fionnphort and Iona. Similarly, the west coast of Iona is recognised as highly sensitive with widespread visibility, and the applicant accepts that significant effects would occur for residents and visitors across much of the island, including at Dùn Ì, Iona's highest point.

Iona's monastic landscape, comprising internationally important heritage assets such as the Abbey, the Nunnery, and the high crosses, derives its significance from pilgrimage, arrival by sea, and movement through the landscape—factors acknowledged in the applicant's own baseline assessment. Despite Historic Environment Scotland's request for additional viewpoints, including from the ferry crossing itself, no visualisation has been provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, leaving an important perspective unassessed.

Furthermore, a household consultation revealed that 92 per cent of respondents on Iona object to the proposal. Notably, the applicant's consultants identify habitability as a potential pathway of effect for this community, yet no assessment of this impact has been undertaken.

To contextualise the perceived scale of the turbines, the tallest proposed turbines would exceed the height of Ben Hynish on Tiree—141 metres tall and visible from Iona at approximately 33 kilometres—by about 194 metres, despite being located at roughly two-thirds of that distance. This comparison underscores the substantial visual dominance the turbines would have in the landscape. Taken together, these points demonstrate that the applicant's assessment fails to adequately capture the magnitude and significance of impacts on Iona, thereby compromising the reliability of the overall environmental and social impact evaluation.

The applicant's assessment acknowledges significant effects on several key areas of Mull and Ross of Mull, including the Ross of Mull South coastal area, which is identified as having High sensitivity at distances of approximately 22 to 24 kilometres and is attributed a Medium magnitude of impact. Notably, significant effects are accepted at Erraid and on the Core Paths of the Ross, as well as at Fionnphort—the critical gateway to Iona and the embarkation point for visitors—where the community's experience is recognised as being significantly affected due to its direct connection to visitor flows.

Across Mull more broadly, the applicant concedes significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Areas. The Loch na Keal National Scenic Area, encompassing the western waters and islands of Mull, is assessed as having High sensitivity throughout a range of approximately 21 to 33 kilometres, yet the magnitude of impact attributed does not exceed Medium. This raises concerns regarding the adequacy of the assessment in capturing the true extent of effects within these designated landscapes.

Further, the approach taken to areas such as the Wilderness and Gribun Rocks coastal area—where the applicant reasons that the scale of change is small due to viewing distances exceeding 30 kilometres—exemplifies a reliance on distance-based criteria that may understate potential impacts. Crucially, the west-facing tourism economy of Mull, along with its wildlife boat operations and accommodation in western townships, depend heavily on the Atlantic seascape, which the proposed development would industrialise. Despite this, none of these communities have been the subject of a place-based assessment, leaving a significant gap in understanding and addressing the localised economic and community effects.

The applicant's assessment acknowledges the effects on designated landscapes within the Loch na Keal National Scenic Area, including Ulva, Staffa, Jura, and the Scarba, Lunga and Garvellachs National Scenic Area, but this evaluation underestimates significant impacts on these sensitive sites and their communities. Ulva, a community-owned island at the onset of regeneration, depends fundamentally on its unspoilt seascape and setting—qualities directly threatened by the proposal—yet no specific assessment of effects on this vulnerable, re-establishing community has been undertaken. Staffa, renowned as one of Europe's most celebrated small islands and situated roughly 35 kilometres from the

development, lies beyond the approximately 30 kilometre boundary within which NatureScot requested assessment of National Scenic Area effects. Nevertheless, the applicant concludes that the scale of change at Staffa would be small and the effect not significant, despite acknowledging the island's panoramic maritime qualities. Similarly, the Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed at a High sensitivity level within 28 to 32 kilometres, but the applicant attributes only Medium to Low magnitude of effect, citing distance and retained landforms as mitigating factors—an approach that downplays the fundamental character underpinning the designation. The Scarba, Lunga and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres away, is treated in the same manner. Taken together, these assessments fail to fully recognise or address the significant effects on important designated landscapes and the fragile island communities whose natural and cultural qualities are integral to their identity and recovery.

The applicant's assessment categorises the South Tiree coastal area as having High sensitivity at an approximate distance of 35 kilometres, while attributing a Low magnitude of change to the proposed development. However, this evaluation appears to significantly understate the likely effects on Tiree's landscape character. The island is exceptionally low-lying, with its highest elevation, Ben Hynish, reaching only 141 metres. Its landscape character is fundamentally defined by the dominance of sea and sky, creating an open oceanic horizon that is both sensitive and distinctive. The introduction of turbines up to 335 metres in height would introduce vertical structures unprecedented in this seascape, thereby altering its defining characteristics in a manner not adequately reflected by a Low magnitude rating. Given the exposed nature of Tiree and the prominence such turbines would have within its visual context, the conclusion of Low magnitude does not reliably represent the scale of change anticipated. Consequently, the assessment's evaluation of effects on Tiree's sensitive landscape is insufficiently robust and requires reconsideration to accurately reflect the magnitude of impact.

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

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

Moreover, the chain of communities along the west coast of Kintyre, whose character, outlook, and visitor economy are intimately tied to the open Atlantic seaboard facing Islay, Jura, and adjacent waters, has also been overlooked. This

oversight extends to the Treshnish Isles and other small islands and mainland coasts with views toward the development area, all of which share a similarly direct visual and economic relationship to the seascape. Collectively, these omissions indicate that the assessment does not fully account for the breadth of receptors potentially affected, thus compromising its overall robustness and reliability.

There remains considerable uncertainty regarding the accuracy of the applicant's distance-based approach to assessing environmental effects beyond 20 kilometres. The evidence demonstrates a consistent pattern whereby the magnitude of change at highly sensitive receptors situated beyond this threshold is systematically moderated and the associated effects discounted. This methodological choice raises doubts about the comprehensiveness and reliability of the environmental impact assessment, as it appears to diminish the significance of impacts that may nonetheless be substantial for affected communities.

Moreover, the communities residing in these more distant locations have not been subjected to any place-based assessment, effectively leaving their experiences and vulnerabilities unaddressed. Taken together, these factors undermine the integrity of the applicant's assessment and suggest that significant effects beyond 20 kilometres have been underestimated. It is therefore essential that the assessment framework be reconsidered to ensure that all sensitive receptors, irrespective of distance, receive appropriate and thorough evaluation.

1.1.728 Summary

The proposal for the MachairWind Offshore Wind Farm has not satisfactorily demonstrated compliance with the applicable statutory and policy requirements. The applicant's own evaluation acknowledges significant adverse impacts on nationally designated landscapes, as well as on coastal communities and their heritage. However, subsequent published analyses of the applicant's documentation reveal that these impacts have been understated. Crucially, the necessary heritage assessment has not been undertaken. Furthermore, although detrimental effects on the island communities implicated by the development were identified, no formal assessment of these effects has been conducted. The ecological criteria prescribed by the relevant tests have also not been evidently met. It is also pertinent to note that the application submitted to the Scottish Ministers pertains to only a portion of the overall project.

In light of these deficiencies, it is respectfully urged that the Scottish Ministers refuse both consent for the MachairWind Offshore Wind Farm and the accompanying marine licence. Should the Ministers consider otherwise, it is requested that they mandate the provision of additional environmental information and enhanced visual representations. Moreover, the determination of the applications should be deferred until after a public inquiry, allowing for a thorough examination of the issues raised within this objection. Regardless of the final decision, it is further requested that the Ministers explicitly address and record their conclusions regarding the impacts on cultural heritage and the affected island communities within their stated reasons.

Yours faithfully,

[Redacted]

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

Member of the public 577
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, referenced by applications 00012385 and 00012386. These relate respectively to consent sought under section 36 of the Electricity Act 1989 and a marine licence application pursuant to Part 4 of the Marine (Scotland) Act 2010, both submitted by MachairWind Limited, trading as ScottishPower Renewables. I request that this objection be officially recorded and that I be informed of the final determination in these matters.

The proposals envisage the construction of an offshore wind farm with a generating capacity of approximately 2 gigawatts. This development would comprise between 91 and 144 wind turbines, each with a maximum blade tip height of up to 335 metres. The designated Windfarm Development Area encompasses around 448 square kilometres of marine space situated to the north-west of Islay and west of Colonsay. The site lies approximately 21 kilometres from the island of Iona and is in close proximity to various islands and coastal communities within the southern Hebrides.

The following sections detail the grounds for objection, framed in the context of the statutory and policy criteria governing the determination of these applications. It is essential to emphasise that the responsibility lies with the applicant to provide sufficient evidence demonstrating compliance with all relevant planning and environmental tests. Objectors are not obliged to establish the contrary. In this instance, the applicant has failed to meet this evidentiary burden, and accordingly, the applications should be refused consent.

1.1.729 Conflict with National Planning Framework 4 and the Development Plan

While NPF4 Policy 11 endorses renewable energy development, this support is explicitly contingent upon compliance with its impact criteria, notably those relating to community effects and the protection of landscape, seascape, and heritage assets as set out in Policy 11(c), (d), and (e). The current proposal fails to satisfy these criteria. It would result in significant adverse effects on nationally designated landscapes and seascapes, undermining their integrity. Furthermore, the proposal does not adequately demonstrate the protection of the cultural significance of scheduled monuments and their settings. It also falls short in evidencing that island communities would be safeguarded from detrimental impacts. Finally, the ecological safeguards required under the policy have not been shown to be achievable based on the submitted evidence. Consequently, the proposal conflicts with the impact criteria of NPF4 Policy 11, weakening the policy’s intended support for renewable energy development.

The proposal fails to comply with multiple National Planning Framework 4 policies designed to protect nationally important landscapes, heritage assets, and biodiversity, resulting in significant adverse consequences. Specifically, it conflicts with Policy 11, which operates alongside Policy 4(c) and 4(d) protecting National Scenic Areas and nationally important landscapes from substantial harm to the qualities for which they are designated. Furthermore, it does not satisfy Policy 7,

including 7(h) concerning scheduled monuments and Policies 7(c) and 7(d) on the setting of historic assets. Additionally, the proposal falls short of Policy 3's requirements on biodiversity protection. The evidence demonstrates that the development would cause significant adverse effects on nationally designated landscapes and seascapes. It has not been adequately shown that the cultural significance of scheduled monuments and their settings would be preserved, nor that island communities would be safeguarded. Crucially, the ecological assessments and tests required by these policies have not been proven to be met based on the submitted evidence. Consequently, the proposal is incompatible with these key NPF4 policies safeguarding designated assets.

The proposal is found to be in conflict with the terrestrial development plan framework, including the Argyll and Bute Local Development Plan 2. Specifically, it would adversely affect the landscape, heritage, and community interests that these policies are designed to protect. This adverse impact demonstrates inconsistency with the development plan as a whole. Furthermore, when considered alongside National Planning Framework 4, the proposal remains at odds with the overarching policy framework, and the applicant has not provided sufficient evidence to dispel this conclusion. Therefore, the proposal fails to accord with the relevant land-based policies and should be refused accordingly.

1.1.730 Seascape, Landscape and Visual Effects

The applicant's assessment methodology, as set out in Appendix 16.1, notably lacks a defined distance threshold beyond which major effects are considered to cease. Nevertheless, a comprehensive review of the applicant's Chapter 16 and Appendices 16.1 to 16.3, as presented in a published Evidence Note supporting community objections, reveals a consistent pattern: no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of its sensitivity or the extent of visibility. This observation is corroborated by the applicant's own documentation, which acknowledges the influence of distance in the evaluation of effects. For example, an assessment of a coastal area over 30 kilometres away explicitly states that, given the viewing distance, the scale of change is judged to be small. Furthermore, the Landscape Character synthesis categorises magnitude as High within roughly 20 kilometres, Medium between approximately 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types.

This systematic moderation of magnitude at distances coinciding with the locations of the most sensitive designated landscapes raises significant concerns regarding the reliability of the conclusions drawn. By effectively applying protective tests to understated inputs, the assessment underrepresents the true scale of effects at critical distances. Consequently, the outcomes do not provide a dependable description of the impacts that the Scottish Ministers are being requested to consent to. It is therefore imperative that the assessment methodology be scrutinised and revised to accurately reflect the magnitude of change at all relevant distances, ensuring that the decision-making process is fully informed.

While the applicant has made efforts to mitigate visual impact through the use of visualisations consistent with NatureScot's guidance, it is important to recognise

inherent limitations within these materials. NatureScot's own guidance, which the applicant follows, states that printed visualisations cannot fully replicate the scale experienced by a viewer in the field. Additionally, wireline drawings included within the same panoramic views share the same constraints as the accompanying photographs; they represent technical renderings within the visualisation rather than serving as independent corrections or enhancements. Consequently, reliance on these visual materials alone may lead to an underappreciation of the true extent of visual effects when experienced on site. It follows that while the visualisations contribute valuable information, their technical and perceptual limitations should be carefully considered in the overall assessment.

The introduction of aviation and navigation lighting as part of the proposed development will permanently alter the character of the night-time seascape, which is currently unlit. This change will persist throughout the stated 35-year operational life of the project, fundamentally transforming the visual experience of the sea horizon after dark.

Beyond the immediate physical impact, the duration of the development's operational life does not diminish the policy implications of this harm. Consent for the project effectively signifies an acceptance that this particular seascape is appropriate for wind farm use, setting a precedent for how such areas are valued and protected within planning policy frameworks.

Given the permanent nature of the lighting effects and the broader policy message conveyed by approval, careful consideration must be given to whether this change to the night-time seascape aligns with the intended landscape protection objectives. The decision will have lasting consequences for the seascape's character and the interpretation of its suitability for similar developments in the future.

The proposal's acknowledged effects engage multiple provisions of the National Planning Framework 4, specifically Policies 4(c) and 4(d), Policies 11(d) and 11(e), alongside Policy GEN 7 and paragraph 4.28 of the National Marine Plan. Despite this clear policy relevance, the applicant has failed to demonstrate that its conclusions regarding the scale of these effects align with the methodology it purports to have employed. This shortcoming undermines confidence in the accuracy and reliability of the impact assessments presented. Moreover, the proposal does not evidence compliance with the policies designed to protect nationally important landscapes and seascapes, which are of significant planning and environmental value. In light of these deficiencies, it is concluded that the proposal does not meet the requirements of the key planning policies safeguarding landscape and seascape interests and should therefore be refused.

1.1.731 Cultural Landscape, Archaeology and Historic Environment

There is significant uncertainty regarding the reliability of the applicant's heritage impact assessment due to apparent non-compliance with the prescribed evaluation methodology. Although the applicant states that Historic Environment Scotland's recognised approach has been followed—an approach that emphasises assessing whether changes to setting affect its contribution to cultural significance and whether the integrity of setting is retained, explicitly cautioning against equating visual change

with adverse impact—the evidence indicates otherwise. A Methodological Audit, conducted independently and based solely on the applicant's own Appendix 14.3, finds that while the assessment identifies relevant heritage attributes and describes various aspects of visual change such as visibility, distance, and monument prominence, it fails to demonstrate the critical evaluative step required by the methodology: a clear assessment of how the integrity of setting has been maintained. In other words, the conclusion that the integrity of setting is adequately retained is not substantiated by the analysis presented. This omission calls into question the robustness and validity of the applicant's conclusions on heritage impacts.

The practical consequence of the applicant's assessment is that it risks underrepresenting the full cultural significance of the heritage assets affected. The applicant's own baseline acknowledges that this significance arises not only from isolated monuments but from experiential qualities such as pilgrimage routes, arrival by sea, and movement through a living cultural landscape. These qualities encompass the relationships between monuments, spirituality, and the surrounding landscape and seascape, which are appreciated through dynamic movement rather than static viewpoints. Historic Environment Scotland's consultation responses, as recorded in the application, further highlight this concern by requesting additional viewpoints to ensure that these broader cultural and experiential qualities are adequately represented. Without addressing these wider aspects, the assessment may fail to capture the heritage assets' true baseline qualities, leading to an incomplete understanding of potential impacts.

The heritage impact conclusions presented in the application are fundamentally reliant on the findings of the accompanying landscape assessment. It is acknowledged that where the landscape assessment underestimates the extent or significance of landscape effects, as previously outlined, such understatement inevitably affects the accuracy of the heritage conclusions derived from it. This interdependency means that any shortcomings in the landscape evaluation directly diminish the robustness of the heritage impact appraisal.

Given this reliance, the credibility of the heritage conclusions must be carefully scrutinised in light of the identified deficiencies in the landscape assessment. If landscape effects are understated, the heritage impacts, which are assessed on the basis of those landscape effects, will also be understated. This creates a risk that the true extent of harm or change to heritage assets and their settings may not have been fully recognised or appropriately mitigated in the assessment process.

Therefore, a thorough and accurate landscape assessment is essential to underpin any reliable heritage impact conclusions. Without rectifying the shortcomings in the landscape evaluation, it is difficult to place full confidence in the heritage impact findings as currently presented. This highlights the need for a more robust and transparent approach to assessing landscape effects to ensure that heritage considerations are properly informed and addressed.

The application fails to demonstrate compliance with key policy requirements designed to safeguard heritage assets of international and national importance, notably those protected under NPF4 Policy 7(h) concerning scheduled monuments

and Policies 7(c) and 7(d) related to their setting. This shortfall is significant given the statutory weight these provisions carry in the planning framework. Additionally, the application does not adequately engage with GEN 6 or the guidance set out in paragraphs 4.22 to 4.23 of the National Marine Plan, both of which reinforce the imperative for rigorous heritage protection.

Critically, the applicant has not provided sufficient evidence to show that the cultural significance of these heritage assets and their settings will be preserved. The absence of a robust assessment undermines the confidence that the proposed development would not result in harm to assets of such high heritage value. Without this essential analysis, Scottish Ministers cannot be satisfied that the statutory duties relating to heritage protection have been fulfilled, thereby compromising the application's acceptability in principle.

In light of these deficiencies, it is clear that the proposal does not meet the necessary standards for the protection of heritage assets as mandated by current planning policy. This failure to adequately assess and mitigate potential impacts on culturally significant sites fundamentally undermines the application's compliance and warrants refusal. Consequently, the application should not be granted planning permission.

1.1.732 Effects on Island Communities, Tourism and the Local Economy

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

1.1.733 Ecology, Biodiversity and Habitats Regulations

The practical consequence of the applicant's submission of a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan is that it acknowledges the potential for adverse effects on the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are specifically prepared to address situations where an adverse effect on the integrity of a protected site cannot be definitively ruled out. The submission of such materials is therefore a significant element of the application. Notably, the applicant's own approach implies that the Scottish Ministers may ultimately reach a different conclusion regarding the presence or absence of adverse effects. In summary, the applicant's provision of these derogation and compensation documents confirms recognition of possible impacts on a protected site and signals an intention to mitigate these impacts in accordance with derogation provisions.

1.1.734 Public Engagement, Site Selection and Environmental Information

There is considerable uncertainty surrounding the adequacy of public participation in the site-selection process, which the applicant urges the Scottish Ministers to weigh heavily. The quality of engagement at both the plan and site-selection stages exhibits notable deficiencies that have persisted into the current application phase. Given the extensive volume of technical documentation—comprising many thousands of pages—and the timing of the consultation during the island communities' busiest months, when residents are occupied with continuous work throughout the visitor season and access to specialist advice is limited, the opportunity for meaningful participation has been severely constrained. This contrasts starkly with the applicant's prolonged preparation period and substantial professional and financial resources.

The importance of effective public participation in decisions of this scale is underscored by GEN 18 of the National Marine Plan and the principles enshrined in the Aarhus Convention. These require that those affected are afforded a realistic opportunity to contribute to the decision-making process. Unfortunately, the circumstances under which the local communities have been expected to respond fall short of these established standards.

In light of these concerns, it is essential that the Scottish Ministers give careful consideration to the limitations of the consultation process when evaluating the representations submitted. The legitimacy of the site-selection process depends significantly on ensuring that public participation is both meaningful and accessible, and this has not been demonstrably achieved in the present case.

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

1.1.735 Effects on Local Area

The applicant's assessment significantly underestimates the direct and substantial effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, calling into question the reliability of the overall environmental and heritage impact evaluation. Islay and Colonsay lie immediately adjacent to the proposed development area, which spans 448 square kilometres; yet Islay is primarily considered only as a potential project location rather than as an affected island community in its own right. This approach neglects the Atlantic-facing communities

of Islay, which border the development's closest edge and lack any place-based assessment of impacts on their setting, local economy, or community life. Similarly, Colonsay and Oronsay face the development area directly across their seaward outlook, integral to their daily experience. The North Colonsay and Western Cliffs Special Protection Area, located on Colonsay's coastline, is the subject of the applicant's derogation case and compensation plan, implicitly acknowledging that harm to its internationally protected seabird population cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance within this community, suffers from the same shortcomings identified elsewhere in the heritage assessment, particularly in relation to the evaluation of its open maritime setting. Taken together, these deficiencies demonstrate that the assessment fails to adequately address the significant and direct effects on these island communities and their heritage.

The applicant's Coastal Character assessment recognises the Sound of Iona as an area of high sensitivity, noting its direct orientation towards the proposed development, extensive visibility, and a large geographical extent of change. The assessment identifies a Moderate and Significant overall effect across approximately 21 kilometres, with turbines spanning around 39 degrees of the horizon. The West Coast of Iona is similarly acknowledged as highly sensitive with widespread visibility, and the applicant accepts that significant effects will be experienced by residents and visitors throughout much of the island, including at Dùn Ì, the island's highest point.

Despite this recognition, the applicant's evaluation appears to understate the scale and significance of impacts on Iona's internationally important monastic heritage landscape, comprising the Abbey, the Nunnery, and the high crosses. These heritage assets are intrinsically linked to pilgrimage, arrival by sea, and movement through the landscape, factors emphasised in the applicant's own baseline studies. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet the applicant has not provided visualisations from critical vantage points such as the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn. This omission limits a full understanding of the visual effects on the heritage setting.

Community concerns further illustrate the potential underestimation of impacts. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal, highlighting strong local opposition. Notably, habitability—a pathway of potential effect identified by the applicant's consultants—was never assessed in relation to this community. To appreciate the scale of the turbines' visual dominance, the applicant's evidence compares them to the familiar landmark of Ben Hynish on Tiree, which at 141 metres is visible from Iona at approximately 33 kilometres; the proposed turbines would overtop Ben Hynish by about 194 metres at roughly two-thirds of that distance, emphasising their imposing presence. Taken together, these points suggest that the applicant's environmental and social impact evaluation does not fully capture the magnitude of effects on Iona.

The applicant's assessment of the impacts on wider seaboard designated landscapes and island communities appears to understate the significance of effects, particularly when considering the scale of potential mitigation compared to the

inherent qualities of these areas. For example, while the applicant acknowledges the panoramic maritime qualities of Staffa, located approximately 35 kilometres from the development area and within the Loch na Keal National Scenic Area, it concludes that the scale of change there would be small and the effect not significant. This conclusion is reached despite Staffa lying beyond the approximate 30 kilometre distance to which NatureScot advised the assessment of effects on National Scenic Area qualities should extend, suggesting that the assessment may not fully account for the broader seascape impact.

Similarly, the Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is described as having high sensitivity within a range of approximately 28 to 32 kilometres from the development, yet the applicant attributes only a medium to low magnitude of effect. This moderation is explained by distance, apparent scale, and retained landforms; however, such an approach risks undervaluing the fundamental qualities that underpin Jura's designation. The same rationale is applied to the Scarba, Lunga and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres from the site, where the applicant's assessment likewise limits the magnitude of effect without thoroughly addressing the cumulative impacts on these sensitive seascapes.

Of particular concern is the omission of any specific assessment of Ulva, a community-owned island within the Loch na Keal National Scenic Area that shares fully in the effects on that designated landscape. Ulva is a small, re-establishing community whose recovery depends on the unspoilt qualities of its setting and surrounding seascape. The absence of dedicated consideration for Ulva's unique social and environmental context undermines the protection of its natural and cultural qualities. Overall, the applicant's approach tends to underestimate significant effects on both designated landscapes and vulnerable island communities, thereby weakening the safeguard of their important attributes.

The applicant's assessment assigns the South Tiree coastal area a High sensitivity rating at an approximate distance of 35 kilometres while attributing a Low magnitude of change. This evaluation significantly understates the true extent of impact on Tiree's distinctive landscape character. Tiree is an exceptionally low-lying island, with its entire landscape defined by the dominance of sea and sky. Its highest point, Ben Hynish, reaches only 141 metres, and the island's character relies heavily on an open oceanic horizon. Introducing turbines up to 335 metres in height would present vertical structures unprecedented in the seascape. Given this exposure and sensitivity, the conclusion of a Low magnitude of change fails to capture the substantial visual and character effects, leading to an unreliable overall assessment of impact on this receptor.

The applicant's assessment notably omits consideration of significant effects on mainland and island communities that have direct visual and economic connections to the seascape in question. Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by residents, faces the development waters from the east. Despite its finely balanced community and economy, the potential impacts on Gigha have not been examined. Similarly, Ardnamurchan Point, the most westerly point of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the

peninsula. These seaward panoramas represent precisely the type of receptors that are subject to undue distance-based moderation within the applicant's assessment, thereby undervaluing their sensitivity. Additionally, the west coast of Kintyre comprises a chain of communities whose outlook, character, and visitor economy are intrinsically linked to the open Atlantic seaboard facing Islay, Jura, and the surrounding waters. The Treshnish Isles and other small islands and mainland coasts with views towards the development area share this same reliance and exposure. The failure to address the effects on these communities compromises the comprehensiveness and robustness of the applicant's environmental and socio-economic evaluation, raising concerns over the completeness of the submitted evidence.

The applicant's environmental impact assessment employs a distance-based methodology that systematically moderates the magnitude of change and discounts the significance of effects on sensitive receptors located beyond approximately 20 kilometres. This approach is evident in the treatment of numerous highly sensitive locations, where the assessment reduces the perceived impact with increasing distance, effectively diminishing the weight given to changes experienced by these receptors. As a result, the assessment fails to provide a comprehensive, place-based analysis for the communities residing beyond this threshold, who nonetheless endure the consequences of the proposed development.

This systematic moderation and discounting undermine the integrity of the environmental impact assessment by neglecting the real and potentially significant effects on distant but sensitive receptors. The absence of detailed, location-specific evaluation for these communities means that their experiences and the full extent of environmental change are neither adequately recognised nor addressed. Consequently, the assessment's reliance on a rigid distance metric results in an incomplete understanding of impacts, potentially compromising the robustness and fairness of the decision-making process.

1.1.736 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy requirements governing its determination. The applicant's own assessment acknowledges considerable impacts on nationally designated landscapes, as well as on the coastal communities and their heritage. Furthermore, published evaluations of the applicant's documentation reveal that the extent of these impacts has been underestimated and that a comprehensive heritage assessment has not been conducted. Although the effects on the island communities involved were identified, no formal assessment of these impacts has been undertaken. In addition, the ecological criteria necessary for approval have not been demonstrated as achievable. It is also pertinent to note that only a portion of the project is currently submitted to the Scottish Ministers for consideration.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to decline the related marine licence application.

Should the Ministers be inclined to grant consent, I request that they require the submission of further environmental information and enhanced visualisations. I also propose that the determination of the applications be deferred until after a public inquiry, thereby allowing a thorough examination of the issues raised in this objection. Regardless of the decision reached, I ask the Ministers to provide clear and explicit conclusions concerning the impacts on cultural heritage and on the affected island communities within their stated reasons.

Yours faithfully,

[Redacted]

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

Member of the public 578
Dear Sir/Madam,

I hereby formally register my objection to the MachairWind Offshore Wind Farm proposals, submitted under application numbers 00012385 for consent pursuant to section 36 of the Electricity Act 1989, and 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. I request to be recorded as an objector and to receive notification of the final decision regarding these applications.

The project in question involves the development of an offshore wind farm with an estimated capacity of around 2 gigawatts. It proposes the installation of between 91 and 144 turbines, each reaching heights of up to 335 metres to blade tip. This development is planned within a designated Windfarm Development Area spanning approximately 448 square kilometres of sea, located to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in proximity to the islands and coastal communities of the southern Hebrides.

My objection is grounded in the planning and environmental considerations relevant to these applications, assessed against the statutory and policy framework governing such developments. It is important to emphasise that the responsibility lies with the applicant to provide robust and sufficient evidence to meet the required planning tests. Objectors, including myself, are not obliged to disprove the applicant's case. In light of the evidence presented, the applicant has failed to satisfy the necessary criteria, and therefore, the applications should be refused consent.

1.1.737 Seascape, Landscape and Visual Effects

The applicant's assessment methodology, as set out in Appendix 16.1, notably lacks a defined distance threshold beyond which major effects are considered to cease. Nevertheless, an independent Evidence Note, analysing the applicant's Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern across all three assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of its inherent sensitivity or the extent of visibility. This pattern is further corroborated by the applicant's own documentation, which acknowledges the influence of distance on judgements—highlighting, for example, that a coastal area over 30 kilometres away is assessed as experiencing only a small scale of change. The Landscape Character synthesis similarly identifies a High magnitude of effect within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types.

Such a methodological approach results in the protective tests being applied to understated inputs. By systematically moderating magnitude at precisely those distances where the most sensitive designated landscapes are situated, the assessment's conclusions fail to provide a reliable description of the effects the Scottish Ministers are asked to consider. Consequently, there is a significant concern that the current methodology does not accurately capture the true extent of potential impacts on sensitive receptors, undermining the robustness of the decision-making process.

The practical consequence of relying on the visualisation materials submitted is that they cannot fully convey the true scale and visual impact of the proposed development as experienced on site. NatureScot's visualisation guidance, which the applicant follows, explicitly recognises that printed visualisations are inherently limited in replicating the scale perceived by a viewer in the field. Furthermore, the wireline drawings included within the same panoramic projections are constrained by the same technical limitations as the accompanying photography; they serve as a technical rendering within the visualisation rather than functioning as an independent corrective tool. Consequently, the visual evidence provided must be treated with caution, as it cannot be assumed to represent an accurate or complete depiction of the development's visual effects. This limitation undermines the reliability of the visual assessment and should be given appropriate weight in the decision-making process.

While mitigation measures may address some visual impacts of offshore development, the introduction of aviation and navigation lighting presents a distinct and permanent alteration to the night-time seascape character. Currently, the sea horizon remains unlit, and the proposed lighting would irrevocably change this condition for the entire 35-year operational lifespan of the project. Importantly, this operational timeframe does not limit the extent of harm in planning terms; consenting to the development effectively designates this seascape as appropriate for wind farm use, with all attendant changes to its character. Such a fundamental shift requires careful consideration given the significance of preserving the existing unlit marine environment at night.

The proposal's acknowledged effects on the landscape and seascape are significant enough to engage multiple policies within the planning framework, specifically NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively aim to safeguard nationally important landscapes and seascapes from adverse impacts, underscoring the importance of rigorous assessment and mitigation measures.

However, the applicant has failed to substantiate that its assessment of these effects aligns with its own stated methodology. This lack of methodological consistency undermines the credibility of the conclusions presented and raises concerns about the accuracy of the predicted scale of impacts. Without clear evidence demonstrating that the assessment complies with established procedures, it is impossible to ascertain whether the proposal adequately addresses the relevant policy requirements.

In light of these deficiencies, the proposal does not meet the necessary standards set out in the planning policies designed to protect nationally important landscape and seascape interests. Consequently, the application should be refused on the grounds of non-compliance with the relevant statutory planning policies, ensuring that these valued environmental assets are properly conserved.

1.1.738 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of heritage impacts fails to comply fully with the required methodology, thereby undermining the reliability of its conclusions regarding the

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

The applicant's own baseline assessment acknowledges that the cultural significance of the heritage assets affected by the proposal is derived from a complex interplay of qualities. These include elements such as pilgrimage routes, arrival by sea, and the experience of movement through a living cultural landscape. Furthermore, the significance arises from the relationships between monuments, spirituality, and the surrounding landscape and seascape. Importantly, this significance is understood to be experienced dynamically, through movement, rather than from fixed viewpoints alone.

Despite this recognition, Historic Environment Scotland's consultation responses—also recorded within the application—highlight a concern that the assessment may not fully capture these broader experiential qualities. They specifically requested the inclusion of additional viewpoints to ensure that the wider cultural landscape and its associated values are properly represented in the heritage impact appraisal. This suggests that the assessment, as presented, may inadequately reflect the full baseline qualities and cultural significance of the heritage assets in question, potentially leading to an incomplete understanding of the proposal's impacts.

The practical consequence of relying on an understated landscape assessment is that the subsequent heritage impact conclusions lack credibility. If the landscape effects are minimised, as previously demonstrated, then any heritage assessments that depend on these landscape findings will inevitably reflect the same level of understatement.

This interdependence means that deficiencies in the landscape evaluation directly undermine the robustness of heritage conclusions. Without an accurate and comprehensive landscape assessment, the heritage impact analysis cannot be considered reliable, thereby weakening the overall planning justification.

The application fails to demonstrate adequate mitigation measures to protect heritage assets, falling short of the requirements set out in relevant policy. This matter engages NPF4 Policy 7(h) concerning scheduled monuments, alongside Policies 7(c) and 7(d) which address the setting of such assets, as well as GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Crucially, the applicant has not provided evidence that the cultural significance of internationally and nationally important heritage assets and their settings will be safeguarded. Consequently, the Scottish Ministers lack the necessary assessment to conclude that these heritage

interests would be properly protected. This absence of demonstrable compliance with key heritage protection policies undermines the acceptability of the application.

1.1.739 Effects on Island Communities, Tourism and the Local Economy

The proposal presents a clear and immediate risk to the economic foundation of the island communities, which rely heavily on visitors drawn by distinctive local qualities. The applicant's own baseline assessments acknowledge that visitors are attracted specifically by the landscape, seascape, cultural heritage, tranquillity and remoteness of these islands. Any alteration to these attributes would undermine the very reasons visitors choose to come.

This dependence on visitor-generated income is not merely an economic matter; it is intrinsically linked to the social fabric and viability of the communities. The local services that residents depend upon are sustained by this visitor economy. Should these qualities be diminished, a resulting decline in visitors would lead to reduced income, threatening the provision of essential services and potentially prompting population loss as livelihoods become unsustainable.

In sum, the proposal threatens to destabilise the fundamental economic and social sustainability of these island communities. Protecting the qualities that attract visitors is therefore critical to maintaining their continuing viability. Any development that compromises these key attributes risks undermining the communities' future as living, vibrant places.

The practical consequence of the applicant's flawed socio-economic assessment is a failure to properly identify and mitigate impacts on the island communities affected by the proposed development. The applicant's own consultants acknowledged that habitability could be a significant pathway for effects on these communities, yet no specific assessment of habitability was undertaken. Instead, the socio-economic analysis presented in Chapter 18 focuses predominantly on regional-level impacts and provides detailed consideration of port communities, while neglecting equivalent place-based scrutiny of the island communities themselves. Despite this omission, the assessment nonetheless concludes that the island communities are of low sensitivity to tourism effects, a conclusion that lacks substantiation.

This approach fundamentally misunderstands the nature of small island economies. Unlike broader regional averages, these economies are typically concentrated in sectors that are directly vulnerable to changes in the attributes that attract visitors. The dependence on visitor numbers does not mitigate sensitivity to tourism-related impacts; rather, it intensifies the vulnerability by deepening reliance on the very qualities that may be compromised by the development. Consequently, the assertion of low sensitivity for island communities, reached without any place-specific analysis, amounts to an unfounded assumption rather than an evidence-based conclusion.

Given these deficiencies, the applicant's socio-economic assessment cannot be relied upon to inform a sound planning decision. The absence of a robust, place-based evaluation of the island communities leaves a significant gap in understanding the potential adverse effects of the proposal. Without addressing this critical shortcoming, the assessment fails to provide an adequate basis for mitigation

measures or to ensure that the unique social and economic characteristics of these communities are properly protected.

The proposal fails to meet essential planning and statutory requirements for assessing and protecting island communities, which raises significant concerns about its suitability. Without a thorough understanding of the potential impacts on these communities, there is a practical risk that adverse socio-economic consequences may arise, undermining the sustainability and well-being of island populations.

This shortfall directly contravenes established policy and statutory duties. Specifically, the proposal engages provisions set out in GEN 19 and paragraph 4.81 of the National Marine Plan, both of which mandate that decisions be founded on robust socio-economic evidence and adopt a precautionary approach where such evidence is insufficient. Additionally, the requirements of NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 are clear in demanding that the interests of island communities be assessed comprehensively and given substantial weight through meaningful engagement from the earliest stages to project completion.

The applicant acknowledged the need for particular scrutiny of island communities yet failed to carry out the necessary assessments to understand fully how the proposal might affect them. Consequently, it has not demonstrated compatibility with the principles of sustainable island communities, nor has it shown that the statutory duties owed to these communities have been fulfilled. This represents a significant deficiency that should weigh decisively against the proposal's approval.

1.1.740 Ecology, Biodiversity and Habitats Regulations

There remains considerable uncertainty regarding the ecological implications of the proposed development, particularly given the presence of Priority Marine Features and Annex I habitats within the area concerned. These sensitive habitats are not only situated within the development site itself but are also part of a wider marine environment that supports diverse species including seabirds, marine mammals, and basking sharks.

The scale and duration of the proposal raise further concerns, as the construction, operational, and decommissioning phases would extend over several decades. This prolonged activity risks causing significant adverse effects to these protected and priority species, whose conservation status underscores the importance of their habitats.

In light of these factors, it is imperative that the ecological sensitivity of the site and its surroundings be thoroughly accounted for in any planning decisions. The potential for environmental harm necessitates a cautious and comprehensive assessment before any progression of the development proposal.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan, specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents represent recognised mechanisms intended to address potential

adverse impacts on protected sites when it cannot be conclusively ruled out that the proposal would maintain site integrity. Their inclusion signals the applicant's awareness of possible significant effects and a preparedness to implement measures in line with derogation provisions.

It is important to understand that such submissions are typically prepared for situations where adverse effects on the integrity of a protected site are uncertain or likely. The presence of these documents within the application is a critical feature, as it highlights that the applicant does not categorically exclude the possibility of harm. This is a prudent step intended to facilitate regulatory consideration and possible mitigation, reflecting an approach that accounts for ecological sensitivities and the need for compensatory action.

Nevertheless, the applicant acknowledges that Scottish Ministers may arrive at a different conclusion regarding adverse effects than the applicant's own assessment. This recognition underscores that the submitted derogation and compensation documents serve as precautionary and responsive measures rather than definitive proof of no impact. In this context, the documents form a necessary part of the application's overall environmental evaluation, contributing to informed decision-making about the proposal's acceptability and the adequacy of proposed mitigation.

Consent for developments affecting protected habitats and species can only be granted where it is conclusively demonstrated that there will be no adverse effect on the integrity of the protected site, unless the strict derogation tests under the Habitats Regulations are satisfied. The competent authority must be certain that no reasonable scientific doubt remains regarding the proposal's impacts. This high evidential standard places the burden of proof firmly on the applicant. Importantly, mitigation measures, compensation proposals, and future monitoring arrangements alone do not suffice to meet the statutory requirements. This legal framework is reinforced by the Habitats Regulations and is further engaged through relevant policy provisions, including GEN 9 and GEN 13 of the National Marine Plan, as well as NPF4 Policies 3, 4(b), 4(e), and 4(f). In summary, planning consent in these circumstances demands robust, unequivocal evidence that statutory tests are fully satisfied before permission may lawfully be granted.

The practical consequence of the applicant's failure to meet the statutory tests is that the application cannot lawfully proceed without undermining the protection afforded to internationally important ecological features. This shortcoming directly impacts the decision-making process, as the legal framework requires unequivocal demonstration that such habitats and species will not be adversely affected. Without satisfying these tests, the application's approval would be inconsistent with statutory obligations.

The evidence submitted, including the applicant's own derogation documents, reveals a significant degree of uncertainty regarding the potential impacts on protected habitats and species. This uncertainty stems from a lack of definitive demonstration that the statutory tests can be fulfilled. The tests are designed to safeguard internationally important ecological assets by ensuring that any development avoids, mitigates, or compensates for harm; the applicant has not provided sufficient assurance in this regard.

Consequently, the failure to demonstrate compliance with these legal requirements undermines the case for granting consent. It is essential that development proposals affecting internationally important habitats and species meet the statutory criteria fully and transparently. Given the evidence, it is clear that this application does not meet that standard and therefore should not be approved.

1.1.741 Cumulative and In-Combination Effects

There is significant uncertainty arising from the current approach to assessing the project, as only a portion is presently before the Scottish Ministers. Crucially, the export cable corridor and the onshore transmission works—integral components without which the wind farm cannot operate—are deferred to subsequent applications. Consequently, the comprehensive effects of the entire project are never evaluated together. Instead, key elements are left to be considered through later consenting processes after the principal decision has been made. This fragmented approach conflicts with established legal principles, notably affirmed by the courts in Raeshaw Farms, which require that a project be assessed in its entirety rather than being artificially divided into smaller parts whose individual impacts may appear less significant. Therefore, the current assessment methodology is legally and procedurally flawed, undermining the ability to conduct a thorough and coherent evaluation of the project's overall effects.

While mitigation measures are often highlighted to address environmental impacts, it is critical to scrutinise the reliability of the cumulative impact assessment itself. The assessment relies fundamentally on baseline data derived from the Environmental Impact Assessment, which has been shown to understate effects on landscape, heritage, and socio-economic factors. Because the cumulative assessment uses this reduced baseline, the combined effects of the current proposal alongside existing, consented, and foreseeable developments are similarly underestimated. Consequently, the cumulative impact assessment cannot be regarded as a reliable indicator of the true extent of combined effects, undermining confidence in its conclusions.

The failure to adequately address project splitting and cumulative effects within the application has significant practical implications for the decision-making process. Without a clear and comprehensive assessment of the proposal's combined impacts, including any deferred works, there is a substantial risk that adverse environmental consequences may be overlooked. This omission undermines the integrity of the environmental impact assessment and compromises the ability of regulators and stakeholders to make fully informed decisions.

This concern directly relates to the requirements set out in GEN 21 and paragraph 4.85 of the National Marine Plan, as well as NPF4 Policy 11(e), which collectively emphasise the necessity of properly identifying and assessing cumulative and in-combination effects. Moreover, the Environmental Impact Assessment Regulations specifically address project splitting to prevent the fragmentation of assessments that could mask the true scale and significance of impacts. The applicant has not demonstrated compliance with these provisions, as the cumulative and overall effects of the project have not been reliably identified or evaluated.

Accordingly, it is imperative that the decision-making process explicitly considers the treatment of deferred works and ensures that all potential impacts are transparently and comprehensively assessed. Addressing this deficiency is essential to uphold policy and regulatory standards and to ensure that any approvals granted are based on a sound understanding of the full environmental implications of the project as a whole.

1.1.742 Public Engagement, Site Selection and Environmental Information

The applicant requests that Scottish Ministers place significant weight on the site-selection process; consequently, the quality of public participation throughout that process is directly relevant. However, deficiencies in participation identified at both the plan and site-selection stages have persisted into the application stage. The application itself consists of many thousands of pages of technical material, yet the consultation period has coincided with the busiest months for island communities, during which residents are continuously engaged in work throughout the visitor season and access to specialist advice is at its lowest. This stands in stark contrast to the applicant's advantage of having had years to prepare its case, supported by substantial professional and financial resources.

National Marine Plan policy GEN 18 and the principles of effective public participation enshrined in the Aarhus Convention require that those affected by decisions of this magnitude be afforded a realistic opportunity to engage. The conditions under which the affected communities have been expected to respond fall short of this standard. It is therefore incumbent on the Scottish Ministers to bear these shortcomings firmly in mind when considering the representations made, recognising that the consultation process as conducted undermines the legitimacy of the site-selection process.

The Environmental Impact Assessment submitted in support of this application is insufficient for the Scottish Ministers to make an informed decision. While the assessment is extensive in scope, its adequacy is fundamentally compromised across several key topics. For example, the landscape assessment purports to identify significant effects but relies on a distance-based outcome pattern that its own methodology does not support. Similarly, the heritage assessment fails to demonstrate the application of its stated integrity test, undermining confidence in its conclusions. The socio-economic assessment is also deficient, notably lacking any place-based analysis of the islands directly affected by the proposal.

Moreover, the application frequently depends on future assessments, post-consent plans, monitoring regimes, and additional approvals to address matters that should be resolved at this stage. This approach conflicts with the requirements of the EIA Regulations, which mandate that likely significant environmental effects be fully understood prior to determination. The Scottish Ministers are bound to make their decision based on the evidence currently before them, not on the assumption that outstanding issues will be satisfactorily addressed later.

In light of these considerations, the applicant has not demonstrated that the environmental information provided is adequate for the purposes of determination. Therefore, the Environmental Impact Assessment as submitted fails to meet the

necessary standards, and the application should not be approved on the basis of incomplete and insufficient environmental information.

1.1.743 Effects on Local Area

The applicant's assessment significantly underestimates the direct and substantial effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby undermining the reliability of the environmental and heritage impact evaluation. Islay and Colonsay are the closest inhabited islands to the proposed development area, which covers 448 square kilometres immediately north-west of Islay and west of Colonsay. Despite this proximity, the application predominantly views Islay only as a potential project location rather than as a distinct island community subject to significant impact. Consequently, there is no place-based assessment of how the development would affect Islay's Atlantic-facing communities, their setting, economy, or community life.

For Colonsay and Oronsay, the situation is more acute as their seaward outlook directly faces the development array. The North Colonsay and Western Cliffs Special Protection Area, which constitutes Colonsay's coastline, is central to the applicant's derogation case and compensation plan. This indicates the strongest recognition within the application that harm to the internationally protected seabird population on these cliffs cannot be discounted. Furthermore, Oronsay Priory, a scheduled monument of national importance located within this community, suffers from the same deficiencies identified elsewhere in the heritage assessment, particularly concerning the evaluation of its open maritime setting.

In summary, the failure to adequately assess the effects on these island communities and their heritage assets results in a flawed and incomplete environmental and heritage impact appraisal, raising serious concerns about the overall reliability and robustness of the applicant's evaluation.

The applicant's Coastal Character assessment recognises the Sound of Iona as an area of high sensitivity, noting its direct orientation towards the development site and extensive visibility across a large geographical extent. The assessment concludes a moderate and significant overall effect, spanning approximately 21 kilometres, with turbines visible across about 39 degrees of the horizon. Similarly, the West Coast of Iona is identified as highly sensitive with widespread visibility, and the applicant acknowledges significant effects on residents and visitors throughout much of the island, including at Dùn Ì, Iona's highest point.

Iona's monastic landscape, encompassing the Abbey, the Nunnery, and the high crosses, holds heritage of international importance, with significance closely tied to pilgrimage, arrival by sea, and movement through the landscape, as established in the applicant's baseline. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself; however, no visualisation has been provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, limiting the completeness of the heritage impact assessment.

Community response further underscores the scale of concern, with a household consultation revealing that 92 per cent of respondents on Iona object to the proposal.

Despite habitability being identified by the applicant's consultants as a potential pathway of effect on the local community, this has not been assessed. The perceived scale of the development's visual impact can be contextualised by comparing the turbines with the familiar landmark of Ben Hynish on Tiree, which stands at 141 metres and is visible from Iona at approximately 33 kilometres; the largest turbines would exceed Ben Hynish's height by around 194 metres at roughly two-thirds of that distance. These points collectively indicate that the applicant's assessment may underestimate the true scale and significance of visual, community, and heritage impacts on Iona.

The applicant's assessment fails to adequately address the practical consequences for the communities of Mull and Ross of Mull, particularly those whose livelihoods depend on tourism and the unspoiled coastal environment. Fionnphort, as the gateway to Iona and the primary embarkation point for visitors, is identified by the applicant as significantly affected, yet no tailored, place-specific mitigation or engagement appears to have been undertaken for this community directly bound to visitor flows. This omission risks undermining the economic and social fabric of a community reliant on tourism.

Moreover, while the applicant recognises significant effects on Core Paths and local landscape areas across Mull, including Central, South and West Mull, and the Loch na Keal National Scenic Area, these are attributed only Medium magnitude despite the acknowledged High sensitivity of these landscapes over distances ranging from 21 to 33 kilometres. The assessment's reliance on distance-based criteria, as exemplified by its treatment of the Wilderness and Gribun Rocks coastal area where a viewing distance of over 30 kilometres leads to a conclusion of only small scale change, appears to underestimate the visual and experiential impacts on these highly valued and designated landscapes.

Finally, the importance of Mull's west-facing tourism economy and its associated wildlife boat operations, alongside the accommodation and support of western townships, is not adequately reflected in the assessment. These communities depend on the integrity of the Atlantic seascape, which the proposed development would industrialise, yet no place-based assessment or consideration of their specific economic and cultural reliance has been provided. This lack of detailed, localised analysis undermines confidence that the significant visual, economic, and community impacts on these coastal areas have been properly understood or addressed.

The applicant's assessment acknowledges the effects on designated landscapes within the Loch na Keal National Scenic Area, including Ulva, Staffa, Jura, and the Scarba, Lunga and Garvellachs National Scenic Area, but this evaluation underestimates significant impacts on these sensitive sites and their communities. Ulva, a community-owned island at the onset of regeneration, depends fundamentally on its unspoilt seascape and setting—qualities directly threatened by the proposal—yet no specific assessment of effects on this vulnerable, re-establishing community has been undertaken. Staffa, renowned as one of Europe's most celebrated small islands and situated roughly 35 kilometres from the development, lies beyond the approximately 30 kilometre boundary within which NatureScot requested assessment of National Scenic Area effects. Nevertheless, the applicant concludes that the scale of change at Staffa would be small and the

effect not significant, despite acknowledging the island's panoramic maritime qualities. Similarly, the Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed at a High sensitivity level within 28 to 32 kilometres, but the applicant attributes only Medium to Low magnitude of effect, citing distance and retained landforms as mitigating factors—an approach that downplays the fundamental character underpinning the designation. The Scarba, Lunga and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres away, is treated in the same manner. Taken together, these assessments fail to fully recognise or address the significant effects on important designated landscapes and the fragile island communities whose natural and cultural qualities are integral to their identity and recovery.

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

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

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

The applicant's assessment fails to address the significant effects on key mainland and island communities that have direct visual and economic ties to the seascape in question. For instance, Gigha, a community-owned island renowned nationally for its successful regeneration, faces the development site from the east. The impact on this delicate community and its economy, which relies heavily on its maritime setting, has been entirely overlooked. Similarly, Ardnamurchan Point—the westernmost tip of the British mainland—offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward vistas are precisely the types of receptors that the applicant's distance-based mitigation approach purports to moderate, yet the assessment does not adequately consider their value or sensitivity.

Furthermore, the west coast of Kintyre comprises a series of communities whose identity, character and visitor economies are fundamentally shaped by the open

Atlantic seaboard vistas towards Islay, Jura and the surrounding waters. The Treshnish Isles and other nearby small islands and mainland coasts that overlook the development area share this visual and economic reliance. By neglecting to assess the potential effects on these interconnected communities and landscapes, the applicant's evaluation lacks comprehensiveness and fails to provide a robust basis for decision-making. This omission calls into question the reliability of the conclusions drawn and highlights a need for a more thorough and inclusive assessment.

The applicant's environmental impact assessment employs a distance-based mitigation approach that systematically moderates and discounts effects on sensitive receptors located beyond approximately 20 kilometres. This methodology effectively diminishes the perceived magnitude of change experienced by these communities, contrasting with the more detailed and place-specific assessments conducted within the 20-kilometre zone. By applying a generalized attenuation beyond this boundary, the assessment fails to acknowledge the true extent of potential impacts.

This approach results in a significant gap in the evaluation, as highly sensitive receptors beyond 20 kilometres receive no place-based assessment whatsoever. The consequence is that the lived experiences and environmental conditions of these distant communities are overlooked, undermining the integrity of the overall impact assessment. Such systematic underestimation raises concerns about the adequacy and completeness of the applicant's methodology in capturing the full scope of environmental effects.

1.1.744 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the relevant statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal region. However, independent reviews of the applicant's documentation reveal that these impacts have been understated. Furthermore, a comprehensive heritage assessment, as mandated, has not been undertaken. Although the effects on the island communities involved were identified, no formal assessment of these impacts has been conducted. In addition, the ecological criteria necessary for approval have not been demonstrated as achievable. Compounding these issues, only a portion of the project is currently submitted for consideration by the Scottish Ministers.

Given these substantial deficiencies, it is respectfully urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm and decline the related marine licence. Should the Ministers be disinclined to refuse outright, it is requested that they require the submission of further environmental information alongside enhanced visual representations. Moreover, the decision-making process should be deferred until after a public inquiry, thereby allowing thorough scrutiny of the concerns raised in this objection. Irrespective of the final determination, it is further requested that the Scottish Ministers articulate explicit conclusions within their reasons, particularly addressing the effects on cultural heritage and the impacted island communities.

Yours faithfully,

[Redacted]

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

Member of the public 579
Dear Sir/Madam,

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 pursuant to Part 4 of the Marine (Scotland) Act 2010, both lodged by MachairWind Limited, trading as ScottishPower Renewables. I request that this correspondence be recorded as an official representation, that I be registered accordingly as an objector, and that I be informed of the outcomes relating to these applications.

The proposed development involves the installation of an offshore wind farm with an anticipated generating capacity of approximately 2 gigawatts. This would encompass between 91 and 144 wind turbines, each with a maximum height reaching up to 335 metres to blade tip. The designated Windfarm Development Area extends over roughly 448 square kilometres of marine environment situated to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in proximity to the islands and coastal communities within the southern Hebrides.

The following sections articulate the planning and environmental grounds underpinning this objection, framed within the statutory and policy context relevant to the determination of the applications. It is pertinent to emphasise that the applicant bears the onus of proof, tasked with demonstrating through robust evidence that all applicable tests and criteria are met. The role of objectors is not to establish contrary evidence but to challenge the sufficiency of the applicant’s submissions. Having examined the proposals in detail, it is clear that the applicant has failed to meet this evidential burden. Consequently, the applications should be refused consent.

1.1.745 Seascape, Landscape and Visual Effects

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

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

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

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

The applicant relies on NatureScot's visualisation guidance, which explicitly recognises that printed visualisations are inherently limited in their ability to convey the true scale experienced by a viewer in the field. This acknowledgement underscores that any static images, such as photographs or wireline drawings, cannot fully replicate the immersive spatial perception encountered on site. Furthermore, the wireline drawings included within the panoramic projections are not independent tools for correction but are instead technical renderings that share the same fundamental constraints as the accompanying photography.

This recognition of the limitations inherent in visual evidence is crucial for a balanced assessment of the proposal's visual impact. Given that the visualisations cannot completely replicate actual viewing conditions, their use must be carefully contextualised, with an understanding that they provide only an approximation rather than an exact representation. Therefore, conclusions drawn solely from these materials should be treated with caution, and where possible, complemented by on-site inspections or alternative evaluative methods to ensure a comprehensive appraisal.

The applicant's evidence acknowledges that the proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, thereby permanently altering the character of the night-time seascape for the planned 35-year operational life. This significant change to the visual environment must be carefully considered within the context of relevant planning policies. It is important to note that the 35-year lifespan does not diminish the potential harm in policy terms; consenting to this development effectively signifies acceptance that the seascape is appropriate for wind farm use. Consequently, decision-makers must weigh the enduring impact of lighting on the seascape's character against the benefits of the proposal, recognising that the introduction of artificial illumination in an otherwise dark marine environment represents a fundamental and lasting transformation.

The applicant's evidence acknowledges that the proposed development results in effects that engage several key policies, specifically NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), alongside GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively aim to safeguard nationally important landscapes and seascapes from adverse impacts. However, despite recognising these policy requirements, the applicant has not satisfactorily demonstrated that its assessment of the scale of these effects aligns consistently with its own stated methodology.

Moreover, the applicant has failed to establish compliance with the protections afforded to nationally significant landscape and seascape interests. Without clear evidence to reconcile the conclusions drawn with the necessary policy safeguards, it remains uncertain that the proposal respects the statutory framework designed to preserve these valued environmental assets. This lack of demonstrable compliance

raises substantive concerns regarding the proposal's conformity with relevant planning policies.

1.1.746 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment follows Historic Environment Scotland's established methodology for evaluating the effects of development on the setting of historic assets. This recognised approach, developed and refined in consultation with Historic Environment Scotland, mandates a specific evaluation of whether changes to setting affect the contribution that setting makes to an asset's cultural significance and whether the integrity of that setting is sufficiently preserved. Importantly, the methodology clarifies that visual change alone should not be automatically equated with an adverse impact, thereby requiring a nuanced assessment beyond mere visibility or prominence.

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

The applicant's assessment acknowledges that the cultural significance of the affected heritage assets is derived from a complex interplay of qualities, including pilgrimage routes, arrival by sea, movement through a living cultural landscape, and the interrelationships between monuments, spirituality, and the surrounding landscape and seascape. These qualities are primarily experienced dynamically, through movement, rather than from fixed viewpoints. However, the mitigation measures proposed appear to focus predominantly on visual impacts from selected static vantage points, which risks underrepresenting the broader experiential and cultural landscape values identified in the baseline.

This concern is reinforced by Historic Environment Scotland's consultation responses, as recorded within the application, which specifically requested additional viewpoints to ensure these wider cultural qualities are properly captured. The omission of such viewpoints in the applicant's assessment suggests an incomplete understanding of the heritage assets' significance and potentially inadequate mitigation of impacts on the overall cultural landscape. For a robust and comprehensive evaluation, it is essential that the assessment fully incorporates the living, dynamic nature of the heritage setting, beyond isolated visual perspectives.

The practical consequence of the deficiencies identified in the landscape assessment is that the heritage impact conclusions drawn from it are fundamentally undermined. The heritage conclusions rely directly upon the findings of the landscape assessment; therefore, any understatement of landscape effects

inevitably leads to a corresponding understatement of heritage effects. This interdependence means that where the landscape assessment fails to fully capture or accurately represent the extent of landscape impacts, the subsequent heritage conclusions are rendered less credible. In light of this, the heritage impact conclusions cannot be accepted at face value without addressing and rectifying the shortcomings in the landscape assessment.

The applicant has failed to demonstrate that the cultural significance of internationally and nationally important heritage assets and their settings will be protected, and the Scottish Ministers do not have before them the necessary assessment to support such a conclusion. This deficiency means the proposal does not comply with NPF4 Policy 7(h) concerning scheduled monuments, nor with Policies 7(c) and 7(d) relating to setting, in addition to GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Without adequate evidence to confirm the safeguarding of these heritage assets, the application falls short of key policy requirements and cannot be considered acceptable in its current form.

1.1.747 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development rely to an exceptional degree on visitors who are drawn specifically by the landscape, seascape, cultural heritage, tranquillity and remoteness identified in the applicant's own baseline assessments. Any alteration to these fundamental qualities would directly undermine the economic foundations of these communities. This impact would not only affect local businesses but also jeopardise essential services, population stability and the long-term viability of the island settlements. Consequently, the proposal poses a significant threat to the economic and social sustainability of these island communities by compromising the very attributes that attract and sustain their visitor economy.

The applicant acknowledges that island communities warrant particular scrutiny in the planning process; however, it has failed to conduct the necessary assessment to understand the proposal's effects on these communities. Despite this recognition, there is no demonstration that the development aligns with the principles of sustaining island communities, nor that the statutory duties owed to them have been fulfilled. This omission undermines confidence that the proposal adequately addresses the specific socio-economic and cultural circumstances of island populations.

This shortfall directly contravenes established policy and statutory requirements. Specifically, the proposal engages with GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate decisions to be based on robust socio-economic evidence and to adopt a precautionary approach where such evidence is lacking. Furthermore, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 impose a clear obligation to assess and give meaningful weight to the interests of island communities through comprehensive engagement from the earliest stages to the conclusion of the planning process. Given the absence of such assessment and engagement, the proposal does not comply with these critical policy and statutory standards, thereby failing to safeguard the well-being and sustainability of island communities.

1.1.748 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, as identified in the applicant's evidence. Additionally, the surrounding waters serve as habitats for seabirds, marine mammals, and basking sharks. This highlights the ecological importance and sensitivity of the site, given the presence of these protected species and habitats.

The proposed development would introduce extensive construction, operational, and decommissioning activities into this environmentally sensitive area over several decades. Such large-scale and prolonged disturbance carries a significant risk of adverse environmental effects on the Priority Marine Features and protected species present, necessitating careful consideration of potential impacts and mitigation measures.

The practical consequence of the applicant's submission of a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan is that it acknowledges the potential for adverse effects on the integrity of the North Colonsay and Western Cliffs Special Protection Area, particularly concerning the guillemot population. These documents are specifically prepared for circumstances where it cannot be definitively ruled out that the development would harm the protected site. Their inclusion in the application therefore signals that the applicant recognises the possibility that the proposed development may have significant environmental impacts requiring mitigation.

Importantly, the submission of these derogation and compensation documents serves a procedural and substantive function within the planning process. It indicates that the applicant has sought to comply with the necessary legal and policy frameworks governing protected sites, by proposing measures intended to address and offset any potential harm. However, this does not represent a definitive conclusion on the absence of adverse effects. On the applicant's own approach, there remains scope for the Scottish Ministers to reach a differing view regarding the likelihood or extent of any impacts on site integrity, which may influence the ultimate determination of the application.

In light of this, while the submission of these documents demonstrates an awareness and preliminary attempt to manage environmental risks, it also underscores the unresolved nature of the assessment of effects on the protected guillemot population. The application must therefore be carefully scrutinised to ensure that any potential adverse effects are fully considered and that any proposed compensation measures are robust, proportionate, and deliverable. Only through such a thorough approach can appropriate protection of the Special Protection Area be secured in accordance with planning policy and statutory obligations.

The practical consequence of the stringent legal and policy framework under the Habitats Regulations is that planning consent for developments potentially affecting protected habitats and species can only be granted if it is conclusively demonstrated that the integrity of the protected site will not be adversely affected. This requirement mandates that no reasonable scientific doubt remains regarding the proposal's impact. The onus lies squarely with the applicant to provide robust evidence to

satisfy this high standard. Importantly, mitigation, compensation measures, and proposals for future monitoring alone cannot substantiate compliance with the statutory tests. This rigorous approach is embedded not only in the Habitats Regulations but also reflected in GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. Collectively, these provisions ensure that environmental protection is paramount and that consent is withheld unless the legal and policy conditions are unequivocally met.

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

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

1.1.749 Cumulative and In-Combination Effects

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

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

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

1.1.750 Public Engagement, Site Selection and Environmental Information

The practical consequence of the current Environmental Impact Assessment (EIA) is that the Scottish Ministers are unable to make an informed decision on the application due to insufficient environmental information. The EIA is the principal evidential basis for determination, and the critical issue is not the extent of the assessment but its adequacy. The application identifies potential pathways to significant effects across multiple topics but fails to investigate them comprehensively. For example, the landscape assessment produces outcomes based on a distance pattern that is not supported by its own stated methodology; the heritage assessment does not demonstrate the application of its integrity test; and the socio-economic assessment lacks any place-based analysis relevant to the affected islands.

Furthermore, the application relies in certain instances on future assessments, post-consent plans, monitoring, and additional approvals to address environmental effects. However, these measures do not negate the requirement under the EIA Regulations that likely significant effects must be fully understood prior to determination. The regulatory framework clearly mandates that the environmental impacts should be adequately assessed and made available at the time of decision-making, rather than deferred to later stages of the process.

In conclusion, the Scottish Ministers are obliged to determine the application based on the evidence presently before them. The applicant has not demonstrated that the environmental information submitted satisfies this requirement. Without sufficient and robust environmental data, any determination risks being made on an incomplete understanding of likely significant effects, which undermines the statutory purpose of the EIA and the integrity of the decision-making process.

1.1.751 Effects on Local Area

There remains considerable uncertainty regarding the adequacy of the applicant's assessment of the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Although Islay and Colonsay lie in closest proximity to the proposed development—which extends over a 448 square kilometre area immediately north-west of Islay and west of Colonsay—the application primarily addresses Islay in terms of its potential as a direct project location. This approach neglects a thorough, place-based evaluation of the impacts on Islay as a distinct island community, particularly its Atlantic-facing settlements that confront the nearest edge of the development zone, leaving potential effects on their setting, local economy, and community life insufficiently explored.

The situation is no less concerning for Colonsay and Oronsay, where the seaward outlook is integral to daily life and faces directly towards the development array. Notably, the North Colonsay and Western Cliffs Special Protection Area lies along Colonsay's coastline and forms the focus of the applicant's derogation case and compensation proposals. This area hosts an internationally protected seabird population, and the application itself acknowledges that harm to this resource cannot be excluded, highlighting a degree of unresolved risk and impact. Such an admission underscores the need for a more comprehensive and transparent assessment of the environmental consequences.

Furthermore, Oronsay Priory, a scheduled monument of national importance situated within this community's area, also demands closer scrutiny. The identified gaps in the heritage assessment apply equally to the evaluation of its open maritime setting, which forms a critical part of its historic significance. Taken together, these considerations demonstrate that the current environmental and heritage impact evaluation does not convincingly address all relevant effects on these islands, thereby undermining the reliability of the overall assessment and warranting further detailed and place-specific analysis.

The applicant's Coastal Character assessment recognises the Sound of Iona as an area of high sensitivity, with a direct orientation towards the proposed development site and extensive visibility spanning approximately 21 kilometres. This results in a Moderate and Significant overall effect, with turbines occupying around 39 degrees of the horizon. The West Coast of Iona is similarly identified as highly sensitive, with widespread visibility acknowledged by the applicant, who also accepts that significant effects would arise for residents and visitors across much of the island, including at Dùn Ì, Iona's highest point. Furthermore, the monastic landscape of Iona—comprising the Abbey, the Nunnery and the high crosses—is internationally significant heritage. The applicant's baseline acknowledges the importance of pilgrimage, arrival by sea, and movement through the landscape to this heritage value. Historic Environment Scotland requested additional viewpoints, notably from the ferry crossing itself, yet the applicant failed to provide visualisations from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, thus limiting the thoroughness of the visual impact appraisal.

Beyond the formal assessments, community response further highlights the scale of concern. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal. Notably, habitability—the applicant's own consultants identify it as a potential pathway of effect on the community—was never properly assessed. To illustrate the scale of the turbines' visual dominance, the largest turbines would surpass Ben Hynish on Tiree, a familiar landmark standing at 141 metres and visible from Iona at approximately 33 kilometres, by around 194 metres at roughly two-thirds of that distance. This comparison underscores the likely overwhelming presence of the turbines on the landscape from Iona's vantage points. Taken together, these factors indicate that the applicant's assessment significantly underestimates the scale and significance of visual, community, and heritage impacts on Iona, thereby compromising the accuracy and completeness of the environmental and social impact evaluation.

The applicant's assessment of the visual and community impacts on Mull and Ross of Mull coastal areas relies heavily on distance-based mitigation assumptions, which inadequately reflect the true magnitude of change experienced by these sensitive locations. For example, while the Loch na Keal National Scenic Area is acknowledged as having High sensitivity at viewing distances between 21 and 33 kilometres, the applicant attributes no greater than Medium magnitude to the effects, thereby understating the significance of impact. Similarly, the Ross of Mull South coastal area, assessed as of High sensitivity at approximately 22 to 24 kilometres, is attributed only Medium magnitude despite acknowledged significant effects at Erraid, on Core Paths of the Ross, and notably at Fionnphort. This latter community is particularly critical as it serves as the gateway to Iona and the primary embarkation

point for visitors, yet the assessment fails to adequately account for the disruption to its flow of tourism and community life. The treatment of more distant areas, such as the Wilderness and Gribun Rocks coastal area beyond 30 kilometres, further exemplifies this reliance on distance to downplay the scale of visual change, with the applicant concluding a small scale of change solely on that basis.

Beyond the shortcomings of the visual assessment, the applicant's approach neglects the essential economic and community dimensions tied to these landscapes. Mull's west-facing tourism economy, including its wildlife boat operators and the accommodation sectors within its western townships, is fundamentally dependent upon the Atlantic seascape, which the proposed development would industrialise. Despite this, none of these communities has been subject to a place-based assessment that might elucidate the full extent of economic and social impacts. The failure to recognise the interdependence of landscape, community identity, and visitor experience results in an incomplete and potentially misleading evaluation of effects. Given the prominence of tourism in sustaining these communities, and the designation of key landscapes as nationally and locally important, the applicant's assessment falls short of capturing the significant visual, economic, and community impacts that the development would engender.

The applicant's assessment of the impacts on wider seaboard designated landscapes and island communities appears to underestimate significant effects, particularly when compared to the mitigation standards typically applied to sensitive areas. For instance, Ulva, a community-owned island within the Loch na Keal National Scenic Area, is at the outset of its regeneration and relies heavily on the unspoilt seascape and setting, qualities that remain unassessed in the application despite being integral to the island's recovery. Similarly, Staffa, one of Europe's most celebrated small islands and also within the Loch na Keal National Scenic Area, lies approximately 35 kilometres from the development. This exceeds the 30 kilometre assessment boundary suggested by NatureScot, yet the applicant concludes the effects there would be small and not significant, even though their own evaluation acknowledges the panoramic maritime qualities of the location.

Further, the Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed with High sensitivity at a distance of 28 to 32 kilometres but is attributed only Medium to Low magnitude of effect, justified by distance and retained landforms. This approach is similarly applied to the Scarba, Lunga and the Garvellachs National Scenic Area, situated approximately 35 to 40 kilometres away. Such treatment fails to adequately reflect the intrinsic qualities that underpin these designations. Taken together, these assessments omit the full extent of potential impacts on the natural and cultural qualities of these designated landscapes and the vulnerable island communities that depend on them, thereby undermining their protection and the integrity of the wider seaboard environment.

In considering the potential visual and landscape effects of the proposed development on Tiree, it is instructive to compare the applicant's assessment with established understandings of the island's character and sensitivity. The applicant has attributed a Low magnitude of change to the South Tiree coastal area, despite recognising its High sensitivity at approximately 35 kilometres distance. This

classification appears inconsistent when weighed against the unique and distinctive qualities of Tiree's landscape, which suggest a more significant impact is likely.

Tiree is an exceptionally low-lying island, characterised by its expansive sea and sky views that dominate the landscape. The highest elevation point, Ben Hynish, stands only 141 metres above sea level, reinforcing the openness and horizontality that define the island's visual identity. Introducing turbines reaching heights of up to 335 metres would impose vertical elements entirely without precedent in the seascape, disrupting the island's intrinsic character. Such structures would be highly conspicuous and fundamentally alter the perceived scale and openness that are core to Tiree's sense of place.

Consequently, the conclusion that the magnitude of change would be Low underestimates the extent of visual and landscape effects that would arise from the development. This understatement leads to an unreliable evaluation that fails to fully account for the sensitivity of Tiree as a receptor. A more robust assessment would acknowledge the significant alteration to the island's open seascape and the introduction of prominent vertical features, thereby reflecting a greater magnitude of change commensurate with the island's distinctive landscape character.

The applicant's assessment has not addressed significant effects on several mainland and island communities that have direct views of the proposed development and whose local economies depend on the seascape in question. For example, Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by residents, faces the development site from the east. Despite its finely balanced community and economy, the potential impacts on Gigha have not been examined. Similarly, Ardnamurchan Point, the westernmost point of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas represent precisely the receptors for which the applicant's distance-based moderation approach is applied, raising concerns that the visual and economic effects here have been underestimated. Furthermore, the west coast of Kintyre encompasses a series of communities whose outlook, character and visitor economy are intrinsically linked to the open Atlantic seaboard facing Islay, Jura and the surrounding waters. The Treshnish Isles and other small islands and mainland coasts with views towards the development area similarly share this position and have not been adequately considered. Collectively, these omissions compromise the comprehensiveness of the applicant's assessment by failing to fully evaluate the potential impacts on communities that are both visually and economically connected to the seascape in question.

There remains considerable uncertainty regarding the applicant's methodology for assessing effects on sensitive receptors beyond 20 kilometres. This uncertainty arises because the applicant's approach systematically moderates the magnitude of change and discounts the resulting effects at these distances. As highlighted in the evidence, wherever a highly sensitive receptor lies beyond approximately 20 kilometres, the assessment diminishes the significance of impact without providing any place-based evaluation of the communities affected. Such an approach inevitably undermines the integrity of the environmental impact assessment, as it fails to properly account for and address the experiences of those living with these

effects. Given these concerns, the assessment cannot be regarded as comprehensive or robust in its current form.

1.1.752 Summary

The proposal for the MachairWind Offshore Wind Farm fails to demonstrate compliance with the relevant statutory and policy frameworks governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the coastal communities and heritage; however, published analyses of the applicant's documentation reveal that these impacts have been underestimated. Crucially, the requisite heritage assessment has not been conducted, and although the effects upon the island communities were identified, no assessment of these impacts has been undertaken. Additionally, the ecological criteria necessary for approval have not been demonstrated as achievable. It is also pertinent to note that only a portion of the project is subject to consideration by the Scottish Ministers.

In light of these shortcomings, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to reject the accompanying marine licence application.

Should the Ministers decide against refusal, it is requested that they require the submission of further environmental information and enhanced visualisations. Furthermore, the determination of the applications should be deferred until after a public inquiry, enabling a comprehensive examination of the issues raised in this objection. Regardless of the outcome, I ask that the Ministers provide clear and explicit conclusions within their decision, specifically addressing the effects on cultural heritage and the impacted island communities.

Yours faithfully,

[Redacted]

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

Member of the public 580
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals under applications 00012385 and 00012386, seeking consent pursuant to section 36 of the Electricity Act 1989 and a marine licence under Part 4 of the Marine (Scotland) Act 2010, respectively. These applications, lodged by MachairWind Limited (ScottishPower Renewables), relate to the development of an offshore wind farm with an anticipated capacity of approximately 2 gigawatts. The project envisages the installation of between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip, within a designated Windfarm Development Area encompassing around 448 square kilometres of marine space. This area lies to the north-west of Islay and to the west of Colonsay, situated approximately 21 kilometres from Iona and in close proximity to several southern Hebridean islands and coastal communities.

I formally request that this letter be recorded as an objection, that my status as an objector be duly noted, and that I receive notification of the final determination concerning these applications.

The following exposition details the planning and environmental grounds for objection against the proposed development, framed within the relevant statutory and policy context that governs the determination of these applications. It is imperative to emphasise that the onus of proof rests squarely on the applicant, who must provide sufficient and robust evidence to demonstrate compliance with all applicable tests. Conversely, objectors are not obligated to establish the contrary. Upon careful consideration of the evidence presented, it is evident that the applicant has failed to meet this burden. Accordingly, I contend that consent ought to be withheld.

1.1.753 Seascape, Landscape and Visual Effects

The applicant’s assessment methodology lacks a defined distance threshold beyond which major effects are considered to cease, undermining the reliability of its predicted impacts. Although no such limit is explicitly stated in Appendix 16.1, independent analysis of the applicant’s Chapter 16 and associated appendices reveals a consistent pattern: no highly sensitive receptor beyond approximately 20 kilometres from the development is attributed the highest magnitude of change, regardless of receptor sensitivity or visibility extent. This implicit distance factor is further evidenced by the applicant’s own documents, which note that for a coastal area over 30 kilometres away, the scale of change is judged to be small due to viewing distance, and identify a landscape character magnitude gradient of High within 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. Consequently, the protective assessments are based on systematically moderated inputs at precisely those distances where the most sensitive designated landscapes are situated. This methodological shortcoming calls into question the accuracy of the conclusions and whether they adequately reflect the effects that Scottish Ministers must consider in their decision-making.

The visualisation materials submitted in support of the application cannot fully convey the true scale of the development as perceived by a viewer on site. This practical limitation arises because printed visualisations inherently lack the capacity to replicate the depth and spatial experience encountered in the field. Consequently, any assessment relying on these materials risks underrepresenting the visual impact experienced by observers.

Moreover, the wireline drawings included within the panoramic visualisations do not serve as independent corrections to this shortfall. Instead, they are technical renderings that share the same constraints as the photographic elements they accompany. As such, these wirelines cannot be relied upon to provide a more accurate or objective representation of the development's visual presence within the landscape.

In light of these acknowledged limitations, as set out in NatureScot's visualisation guidance adopted by the applicant, the visual evidence should be treated with caution. Decision-makers must recognise that the materials provide only an approximation of the on-site visual experience and should not be interpreted as definitive or comprehensive representations of the development's visual impact.

The applicant's evidence acknowledges that the proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, thereby permanently altering the character of the night-time seascape throughout the stated 35-year operational life. This change represents a significant visual impact, as the introduction of such lighting would be a novel and enduring feature in an area previously characterised by natural darkness.

It is important to note that, in policy terms, the 35-year operational life does not limit the potential harm to the seascape. The decision to consent to this development effectively constitutes a decision that this particular seascape is considered appropriate for wind farm use, with the attendant acceptance of changes to its character. This policy implication underscores the need for careful consideration of the balance between development benefits and the preservation of seascape qualities.

Given these factors, the impact of the lighting on the night-time seascape character requires thorough assessment within the planning process. While the operational timeframe may be finite, the policy consequences of consenting to such an alteration are enduring, necessitating a measured approach that weighs the permanent visual effects against the broader objectives of sustainable development.

The proposal fails to comply with key planning policies designed to safeguard nationally important landscapes and seascapes. Specifically, the adverse effects identified engage the requirements of National Planning Framework 4 (NPF4) Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. Despite acknowledging these impacts, the applicant has not demonstrated that its conclusions regarding the scale of these effects are consistent with its own assessment methodology. This lack of methodological consistency undermines confidence in the applicant's findings and, crucially, fails to establish that the proposal meets the stringent policy tests intended

to protect these significant natural assets. Consequently, the proposal does not accord with the relevant policies and should be refused on the basis of non-compliance with the statutory framework protecting landscape and seascape interests.

1.1.754 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment methodology, while formally adopting Historic Environment Scotland's recognised approach, ultimately fails to fulfil the essential evaluative requirements set out therein. The methodology expressly mandates that any assessment of effects on the setting of historic assets must consider not only visual changes but also the extent to which these changes affect the contribution that setting makes to the cultural significance of the heritage asset, with particular emphasis on whether the integrity of that setting is retained. Importantly, it clarifies that visual change alone should not be equated directly with adverse impact. This nuanced approach necessitates a clear demonstration of how the integrity of setting has been evaluated in the context of the proposed development's effects.

However, a Methodological Audit, conducted independently and based exclusively on the applicant's Appendix 14.3, reveals a significant shortcoming in this respect. While the operational assessment identifies relevant heritage attributes and provides a detailed description of visual changes—covering aspects such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—it stops short of the critical analytical step required by the adopted methodology. The audit finds no evidence that the assessment explicitly evaluates how these visual changes influence the integrity of setting or the contribution setting makes to cultural significance, as mandated. Instead, the assessment concludes that the integrity of setting is adequately retained without demonstrating the reasoning or analysis that supports this conclusion. Consequently, this omission undermines the reliability of the applicant's conclusions regarding heritage impacts, casting doubt on the robustness of the overall assessment.

The applicant's assessment acknowledges that the cultural significance of the heritage assets in question is not solely derived from their physical presence but from a complex set of experiential qualities. These include elements such as pilgrimage routes, arrival by sea, the sense of movement through a living cultural landscape, and the interrelationships between monuments, spirituality, and the encompassing landscape and seascape. Notably, these attributes are experienced dynamically through movement rather than static viewpoints, a factor that the applicant recognises in their baseline recording.

However, despite this recognition, the mitigation measures proposed appear insufficient to fully capture or preserve these broader cultural and experiential qualities. Historic Environment Scotland's consultation responses, as documented within the application, explicitly requested additional viewpoints to ensure that the assessment would adequately represent these wider landscape and seascape attributes. The absence of such comprehensive visual and experiential analysis potentially undermines the understanding of the heritage assets' significance and the effectiveness of the proposed mitigation. Consequently, there is a concern that the

current assessment underrepresents the full cultural context and may not sufficiently safeguard the intangible qualities that contribute to the heritage assets' value.

The heritage impact conclusions presented in the application are fundamentally reliant on the findings of the accompanying landscape assessment. However, it has been demonstrated that the landscape effects have been understated, as detailed previously. This understatement in the landscape assessment consequently transfers to the heritage conclusions, thereby calling into question their overall reliability and accuracy. The interdependence between these assessments means that any minimisation of landscape impact inevitably leads to a corresponding minimisation of heritage effects.

Given that the heritage conclusions are derived from a landscape assessment that does not fully capture the scale or significance of the landscape effects, the resulting heritage impact appraisal lacks the necessary robustness. This undermines the credibility of the heritage evidence base and suggests that the true extent of heritage harm may be greater than acknowledged. In planning terms, this deficiency must be recognised and addressed to ensure that the heritage impacts are properly understood and appropriately mitigated.

The proposed development fails to comply with key policy requirements aimed at the protection of heritage assets. Specifically, it does not satisfy the provisions set out in NPF4 Policy 7(h) concerning scheduled monuments, nor does it meet the criteria within Policies 7(c) and 7(d) related to the setting of heritage sites. These policies are further reinforced by GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan, which collectively establish a clear framework for safeguarding the cultural significance of heritage assets.

Crucially, the applicant has not provided sufficient evidence to demonstrate that the cultural significance of internationally and nationally important heritage assets, along with their settings, will be maintained and protected. This omission represents a significant deficiency in the application, as the necessary assessment to support such a conclusion is absent. Without this critical information, it is not possible to ascertain the impact of the proposal on these valuable heritage resources.

Given the absence of a comprehensive assessment and the clear policy requirements that remain unfulfilled, the Scottish Ministers cannot be satisfied that the proposal accords with the heritage protection policies. Consequently, the application should not be approved as it currently stands, since it undermines the statutory obligations to protect and preserve heritage assets of national and international importance.

1.1.755 Effects on Island Communities, Tourism and the Local Economy

When assessing the proposal, it is important to consider whether any mitigation measures can adequately address the impacts on the island communities' visitor-attracted qualities. The applicant's baseline evidence recognises landscape, seascape, cultural heritage, tranquillity and remoteness as the key attributes drawing visitors. However, no mitigation can fully preserve these intrinsic qualities once altered by development. The loss or diminution of such attributes cannot be

compensated by typical remedial measures, as their fundamental character and appeal are inherently linked to the unspoilt and undisturbed environment.

The exceptional dependence of these island communities on visitors means that any adverse change to these qualities strikes directly at their economic foundation. This impact is not confined to tourism revenue alone but extends to the provision of local services, population stability and the broader social viability of the islands. Consequently, the proposal poses a significant threat to the ongoing sustainability of these communities, undermining the very factors that support their existence and well-being.

The applicant's own consultants have recognised habitability as a potentially significant pathway through which the proposal could impact island communities. Despite this acknowledgement, no assessment was undertaken to evaluate the habitability of the affected islands. Instead, the socio-economic assessment presented in Chapter 18 focuses primarily on regional-level analysis, providing detailed examination of potential port communities while neglecting a comparable place-based assessment of the island communities directly facing the proposed development. This approach culminates in a conclusion that these island communities exhibit low sensitivity to tourism effects, a finding reached without the benefit of specific, localized analysis.

Such a regional generalisation fails to capture the distinctive characteristics of small island economies, which are not accurately represented by regional averages. These economies tend to be highly concentrated in sectors most vulnerable to changes in the qualities that attract visitors. Rather than diminishing sensitivity, reliance on increasing visitor numbers intensifies dependence on the very attributes that may be compromised by the proposal. Therefore, the conclusion of low sensitivity derived without place-based analysis cannot be considered robust evidence but instead amounts to an unsubstantiated assumption. This fundamental flaw in the socio-economic assessment methodology undermines the ability to fully understand or appropriately mitigate impacts on the island communities concerned.

The proposal fails to comply with essential policy and statutory requirements concerning island communities, resulting in inadequate protection and assessment of their interests. This practical deficiency undermines the integrity of the decision-making process and risks adverse socio-economic impacts on these communities, which depend on thorough and careful evaluation.

In accordance with GEN 19 and paragraph 4.81 of the National Marine Plan, decision-making must be founded on robust socio-economic evidence and adopt a precautionary approach when such evidence is insufficient. Additionally, NPF4 Policy 11(c) alongside the Islands (Scotland) Act 2018 explicitly mandates that the interests of island communities be assessed and given appropriate weight through meaningful engagement from the earliest stages of development through to conclusion. These provisions collectively ensure that island communities are not overlooked or disadvantaged by development proposals.

However, the applicant has acknowledged the need for particular scrutiny of island communities but has failed to conduct the necessary assessments to understand the

proposal's effects on them. Consequently, there is no demonstrated compatibility with the aim of sustaining island communities, nor evidence that the statutory duties owed to these communities have been fulfilled. This omission represents a clear non-compliance with the relevant policy framework, and accordingly, the proposal should not be supported.

1.1.756 Ecology, Biodiversity and Habitats Regulations

There is uncertainty regarding the full extent of ecological impacts arising from the proposed development, given its location within an area containing Priority Marine Features and Annex I habitats. These sensitive environmental assets lie directly within the development zone, while the adjacent waters provide habitat for various protected species, including seabirds, marine mammals and basking sharks. The scale of construction, operational activities and eventual decommissioning envisaged would occur over several decades, raising concerns about potentially significant adverse effects on this ecologically important marine environment. Consequently, it is imperative that these considerations are thoroughly addressed before the proposal proceeds.

The applicant has provided a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically addressing the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are customarily prepared when it is not possible to exclude adverse effects on the integrity of a protected site. Their inclusion in the submission is therefore a notable aspect of the application, indicating that the applicant acknowledges potential impacts that may arise.

This approach reflects an understanding that the Scottish Ministers may ultimately reach a different conclusion regarding the likelihood of adverse effects on the protected site's integrity. By submitting these derogation and compensation measures, the applicant demonstrates a proactive stance aimed at addressing any such impacts in accordance with the derogation provisions. This recognition and corresponding documentation are integral to the assessment of the application's compliance with relevant environmental protections.

Mitigation, compensation proposals, and future monitoring, while important components of environmental management, do not in themselves satisfy the stringent legal requirements for consent under the Habitats Regulations. Consent may only be lawfully granted where the competent authority has ascertained beyond reasonable scientific doubt that the proposed development will not adversely affect the integrity of the protected site. This high evidential standard places the burden of proof squarely on the applicant to demonstrate compliance. Unless the strict derogation tests are unequivocally met, no consent can be issued. This legal framework is reinforced by the provisions of GEN 9 and GEN 13 of the National Marine Plan and Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. Together, these policies and regulations establish a robust and precautionary approach to safeguarding protected habitats and species, ensuring that environmental integrity is upheld in planning decisions.

The applicant's submission falls short of demonstrating compliance with the statutory tests designed to safeguard internationally important habitats and species. An examination of the applicant's own derogation documents reveals a significant degree of uncertainty regarding the effectiveness of proposed mitigation measures. Consequently, the evidence submitted fails to provide the necessary assurance that these legal requirements can be met, thereby undermining the justification for granting planning consent.

1.1.757 Cumulative and In-Combination Effects

The current application assesses only a portion of the overall development, omitting critical components such as the export cable corridor and onshore transmission works, which are essential for the wind farm's operation. Consequently, these significant elements are deferred to separate future applications and are not evaluated alongside the principal proposal. This fragmented approach contravenes established legal principles, as confirmed by the courts in Raeshaw Farms, which mandate that a project must be considered in its entirety rather than segmented into smaller parts to minimise perceived impacts. By failing to assess the full scope of the project collectively, the decision-making process is compromised, undermining the comprehensive evaluation of environmental and planning effects required for a lawful and robust determination.

The practical consequence of relying on the current cumulative impact assessment is a significant underestimation of the true combined effects of the proposed development alongside existing, consented, and foreseeable projects. This arises because the cumulative assessments are fundamentally dependent on the conclusions drawn in the broader Environmental Impact Assessment. Specifically, where the baseline assessments for landscape, heritage, and socio-economic factors have understated the severity of impacts—as previously demonstrated—the cumulative assessment inherits these understated effects. As a result, the baseline from which cumulative impacts are measured is artificially reduced, leading to a cumulative impact appraisal that fails to reflect the real magnitude of combined effects. Consequently, the cumulative impact assessment cannot be regarded as reliable or comprehensive in its current form.

The applicant's submission engages with GEN 21 and paragraph 4.85 of the National Marine Plan, alongside NPF4 Policy 11(e) and the Environmental Impact Assessment (EIA) Regulations concerning project splitting. However, it has not satisfactorily demonstrated that the cumulative and in-combination effects of the proposal, nor the overall effects of the project, have been reliably identified and assessed. This shortfall raises concerns about compliance with the relevant planning policies and environmental regulations designed to ensure comprehensive evaluation of potential impacts.

Given this context, it is imperative that the treatment of deferred works is explicitly addressed within the decision-making process. Without clear consideration of these deferred elements, the assessment remains incomplete, potentially undermining the integrity of the planning determination. Therefore, a thorough evaluation of all components, including deferred works, should be mandated to ensure full regulatory compliance and informed decision-making.

1.1.758 Public Engagement, Site Selection and Environmental Information

The consultation period for this application, comprising many thousands of pages of technical material, occurred during the busiest months of the year for island communities, when residents are engaged continuously through the visitor season and specialist advice is least accessible. This timing has significantly constrained effective public participation, particularly given that the applicant has had years and substantial professional and financial resources to prepare its case. The weight the applicant asks the Scottish Ministers to place on the site-selection process renders the quality of public involvement in that process directly material. However, deficiencies in participation at both the plan and site-selection stages have persisted into the current application phase. Under GEN 18 of the National Marine Plan and the principles of effective public participation enshrined in the Aarhus Convention, those affected must have a realistic opportunity to engage in decisions of this magnitude. The conditions under which these island communities have been expected to respond fall short of this standard. It is therefore imperative that the Ministers take these shortcomings fully into account when considering the representations made.

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

1.1.759 Effects on Local Area

The applicant’s assessment acknowledges Islay and Colonsay as the closest islands to the development area, which lies immediately north-west of Islay and west of Colonsay. However, the application predominantly evaluates Islay only as a potential project location rather than as a distinct island community subject to direct effects. Notably, the Atlantic-facing communities of Islay confront the nearest edge of a substantial 448 square kilometre development area, yet there is no place-based analysis of how this proximity might affect their setting, local economy, or community life. This omission undermines the assessment’s comprehensiveness in addressing the real and tangible impacts on Islay’s residents.

Regarding Colonsay and Oronsay, the daily lives of these communities are intimately connected to their seaward outlook, which faces the development array directly. The North Colonsay and Western Cliffs Special Protection Area, situated along

Colonsay's coastline, is central to the applicant's derogation case and compensation plan, implicitly acknowledging that harm to the internationally protected seabird populations cannot be ruled out. Furthermore, Oronsay Priory, a nationally important scheduled monument, lies within this community's area. The identified gaps in the heritage assessment similarly apply here, particularly concerning the treatment of the priory's open maritime setting. Taken together, these considerations demonstrate that the application underestimates the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, casting doubt on the reliability of the overall environmental and heritage impact evaluation.

The applicant's assessment underestimates the significant impact that the proposed development would have on the island of Iona, leading to an incomplete evaluation of the environmental and social consequences. The Coastal Character assessment identifies the Sound of Iona as highly sensitive, with direct orientation towards the development, extensive visibility, and a large geographical extent of change spanning approximately 21 kilometres. The turbines would dominate around 39 degrees of the horizon, affecting key areas such as the ferry crossing between Fionnphort and Iona. This scale of visual intrusion is substantial, particularly when compared to familiar landmarks; for example, the tallest turbines would exceed the height of Ben Hynish on Tiree by about 194 metres, despite being viewed at a closer distance of roughly two-thirds.

Furthermore, the West Coast of Iona is acknowledged as highly sensitive with widespread visibility, and the applicant accepts that there would be significant effects on residents and visitors throughout much of the island, including at Dùn Ì, Iona's highest point. Importantly, the island's internationally significant monastic landscape, encompassing the Abbey, the Nunnery, and the high crosses, is intrinsically linked to pilgrimage and movement through the seascape. Historic Environment Scotland requested additional visual viewpoints from critical locations such as the ferry crossing, yet the applicant failed to provide visualisations from elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, leaving gaps in understanding the full heritage impact.

Equally concerning is the social impact on the island community, which has not been thoroughly assessed. A household consultation revealed that 92 per cent of respondents on Iona oppose the proposal, reflecting widespread local objection. Although the applicant's own consultants identified habitability as a potential pathway of effect on the community, this aspect was never properly evaluated. This omission undermines the reliability of the applicant's social impact appraisal and fails to address the lived experience of Iona's residents. Taken together, these factors demonstrate that the applicant's environmental and social impact evaluation for Iona is incomplete and underestimates the true scale and significance of the effects.

The applicant's assessment fails to adequately address the significant visual and economic impacts on Mull and the Ross of Mull coastal communities, particularly those reliant on tourism. Although the Ross of Mull South coastal area is recognised as having high sensitivity at distances of approximately 22 to 24 kilometres, it is only attributed medium magnitude effects. The applicant concedes significant effects at Erraid and on the Core Paths of the Ross, as well as on Fionnphort, which serves as the gateway to Iona and the primary embarkation point for visitors. This community is

directly tied to visitor flows and would therefore experience substantial consequences. Similarly, across Mull, significant effects are accepted on Core Paths and within the Central, South and West Mull Local Landscape Area. Notably, the Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is acknowledged as highly sensitive at distances between 21 and 33 kilometres, yet is assigned only medium magnitude impacts. The applicant's reliance on distance-based reasoning is further exemplified in the treatment of the Wilderness and Gribun Rocks coastal area, where effects are downplayed due to viewing distances exceeding 30 kilometres, despite the evident scale of change. Crucially, the applicant does not provide place-based assessments for Mull's west-facing tourism economy, its wildlife boat operations, or the accommodation sector in its western townships, all of which depend heavily on the Atlantic seascape that the development would industrialise. This omission overlooks the practical consequence that these communities and their economic activities would be detrimentally affected by the proposed development.

The applicant's assessment of the impacts on designated landscapes and island communities appears to underestimate the significance of effects on key areas, particularly when compared to the mitigating considerations they present. For instance, Ulva, situated within the Loch na Keal National Scenic Area, is a community-owned island undergoing regeneration. Its recovery is intrinsically linked to the preservation of its unspoilt seascape and setting—qualities central to the designated landscape and yet entirely absent from the assessment. Despite this, the applicant has made no evaluation of the potential effects on Ulva's natural and cultural environment, thus neglecting a vital element of landscape and community protection. Similarly, Staffa, also within the same National Scenic Area and recognised as one of Europe's most celebrated small islands, lies roughly 35 kilometres from the proposed development site. This distance exceeds the approximately 30 kilometres within which NatureScot requested that effects on National Scenic Area qualities be assessed. While the applicant concedes that Staffa possesses panoramic maritime qualities, they conclude that the scale of change would be small and the effect not significant—an assessment that appears inconsistent with the acknowledged value of Staffa's landscape attributes.

A comparable approach is taken with other designated landscapes such as the Jura National Scenic Area, located about 28 to 32 kilometres from the development site. Here, the applicant rates the area as having High sensitivity but assigns only Medium to Low magnitude of effect, justifying this by citing distance, apparent scale, and retained landforms. This reasoning is at odds with the foundational basis of Jura's designation, which emphasises its wild and undeveloped Atlantic character—an attribute likely to be compromised by even moderate alterations. The Scarba, Lunga and Garvellachs National Scenic Area, situated approximately 35 to 40 kilometres away, receives a similar assessment. In all these cases, the applicant's conclusions appear to downplay the potential for significant adverse effects on the qualities that underpin these designated landscapes and their associated communities. Such underestimation risks undermining the protection intended for these sensitive environments and the vulnerable island populations that depend upon them.

The applicant's assessment categorises the South Tiree coastal area as having High sensitivity at an approximate distance of 35 kilometres, yet concludes a Low magnitude of change resulting from the proposed development. This juxtaposition of high sensitivity with low impact magnitude appears incongruous, particularly given the distinctive environmental context of Tiree. The island's exceptional low-lying topography, with its highest elevation at Ben Hynish reaching only 141 metres, underpins a landscape character dominated by expansive sea and sky. Such a setting is inherently sensitive to vertical intrusions.

Given that the proposed turbines would reach heights of up to 335 metres, more than twice the island's highest natural point, their introduction would constitute a profound alteration to Tiree's open oceanic horizon. This scale of vertical structure is without precedent in the seascape and, accordingly, the applicant's conclusion of a Low magnitude of change does not adequately capture the likely visual and experiential impacts. The assessment thus significantly understates the magnitude of change and impact on Tiree's sensitive and distinctive landscape character, leading to an unreliable evaluation of effects.

The applicant's assessment fails to address the significant effects on key mainland and island communities that have direct visual and economic ties to the seascape in question. For instance, Gigha, a community-owned island renowned nationally for its successful regeneration, faces the development site from the east. The impact on this delicate community and its economy, which relies heavily on its maritime setting, has been entirely overlooked. Similarly, Ardnamurchan Point—the westernmost tip of the British mainland—offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward vistas are precisely the types of receptors that the applicant's distance-based mitigation approach purports to moderate, yet the assessment does not adequately consider their value or sensitivity.

Furthermore, the west coast of Kintyre comprises a series of communities whose identity, character and visitor economies are fundamentally shaped by the open Atlantic seaboard vistas towards Islay, Jura and the surrounding waters. The Treshnish Isles and other nearby small islands and mainland coasts that overlook the development area share this visual and economic reliance. By neglecting to assess the potential effects on these interconnected communities and landscapes, the applicant's evaluation lacks comprehensiveness and fails to provide a robust basis for decision-making. This omission calls into question the reliability of the conclusions drawn and highlights a need for a more thorough and inclusive assessment.

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

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

1.1.760 Personal Observations

In addition to the planning matters above, I am personally concerned because: Generation of electricity on this larg scale requires power lines heading south that will inevitably impact community and landscapes negatively.

Based on my own local knowledge, I also wish to highlight that: The visual imapct of this proposal is of great concern. This are is significant for its particular uncluttered beauty. Erection of these structures will be a massive negative.

1.1.761 Summary

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

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

Yours faithfully,

[Redacted]

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

Member of the public 581
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, detailed in application number 00012385 seeking consent under section 36 of the Electricity Act 1989, alongside application number 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications have been put forward by MachairWind Limited, trading as ScottishPower Renewables. I request that this correspondence be recorded as an official objection, that my status as an objector be acknowledged, and that I am kept informed of any decisions relating to these applications.

The proposals envisage the development of an offshore wind farm with a generating capacity of approximately 2 gigawatts, comprising between 91 and 144 turbines, each potentially reaching a blade tip height of up to 335 metres. This development is situated within a designated Windfarm Development Area encompassing roughly 448 square kilometres of marine space, positioned north-west of the island of Islay and west of Colonsay. The site lies approximately 21 kilometres from Iona and is in close proximity to the islands and coastal settlements of the southern Hebrides.

The following analysis outlines the grounds for objection, framed within the applicable statutory and planning policy context governing the determination of these applications. It is important to emphasise that the onus lies squarely on the applicant to provide robust and comprehensive evidence demonstrating compliance with all relevant statutory tests. Objectors are not obliged to prove non-compliance. Upon careful consideration of the evidence submitted, it is clear that the applicant has failed to meet this burden of proof. Consequently, the applications should be refused consent.

1.1.762 Seascape, Landscape and Visual Effects

The applicant’s assessment methodology, as detailed in Appendix 16.1, notably lacks a defined distance threshold beyond which major effects are considered to cease. Nonetheless, analysis derived from the applicant’s Chapter 16 and associated appendices reveals a consistent pattern: no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, irrespective of its inherent sensitivity or the extent of visibility. This implicit distance influence is further evidenced by assessments of coastal areas over 30 kilometres away, where the scale of change is explicitly judged to be small due to viewing distance, and by the Landscape Character synthesis, which categorises magnitude as High within about 20 kilometres, Medium between approximately 20 and 30 kilometres, and Low beyond roughly 30 kilometres for certain landscape types.

Such an approach results in protective assessments being based on systematically moderated inputs at distances coinciding with the location of the most sensitive designated landscapes. Consequently, the conclusions presented do not reliably represent the true effects the Scottish Ministers are requested to consider. The absence of an explicit distance threshold in the methodology undermines the

accuracy and robustness of predicted effects, raising significant concerns about the integrity of the assessment outcomes.

The visualisation materials submitted in support of the assessment exhibit inherent limitations that have a direct impact on the accuracy of the perceived scale and visual effects of the proposed development. These limitations mean that decision-makers and consultees cannot fully rely on the visual evidence as a precise representation of how the development will appear in situ. Consequently, there is a risk that the visual impact may be either underestimated or misinterpreted, which could affect the robustness of any conclusions drawn from these materials.

NatureScot's visualisation guidance, which the applicant has adopted, explicitly recognises these constraints. It states that printed visualisations cannot fully replicate the scale experienced by a viewer in the field. Additionally, wireline drawings that are presented within the same panoramic projections share the limitations inherent in the accompanying photography. These drawings are technical renderings embedded within the visualisation and do not serve as independent corrections or enhancements to overcome the fundamental shortcomings of photographic representation.

Given these acknowledged technical and perceptual limitations, it is essential that the assessment's reliance on these visual materials is appropriately tempered by an understanding of their constraints. This ensures that decisions are not made solely on visualisations that cannot fully convey the real-world experience of the development's scale and presence within the landscape. In light of this, further consideration or supplementary means of assessment may be necessary to provide a more comprehensive understanding of the visual impact.

While mitigation measures may address some visual impacts of offshore development, the introduction of aviation and navigation lighting presents a distinct and permanent alteration to the night-time seascape character. Currently, the sea horizon remains unlit, and the proposed lighting would irrevocably change this condition for the entire 35-year operational lifespan of the project. Importantly, this operational timeframe does not limit the extent of harm in planning terms; consenting to the development effectively designates this seascape as appropriate for wind farm use, with all attendant changes to its character. Such a fundamental shift requires careful consideration given the significance of preserving the existing unlit marine environment at night.

The proposal fails to comply with key planning policies designed to safeguard landscape and seascape interests. Specifically, the effects identified engage the provisions set out in NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively establish clear requirements for the protection of nationally important landscapes and seascapes, which the proposal does not adequately address.

Furthermore, the applicant has not demonstrated that its conclusions regarding the scale of the acknowledged effects align with the methodology it has employed. This lack of consistency raises serious doubts about the reliability of the assessment and undermines confidence in the proposal's claimed compliance with the relevant policy

framework. Without robust evidence that the methodology has been correctly applied, the assessment cannot be considered sufficiently rigorous.

In light of these points, the proposal does not meet the necessary requirements of the planning policies protecting nationally significant landscape and seascape assets. Consequently, it should not be supported as it stands, given the clear shortcomings in demonstrating policy compliance and the potential for unacceptable adverse effects on protected environmental interests.

1.1.763 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of heritage impacts fails to comply with the required methodology, thereby undermining the reliability of its conclusions regarding the integrity of setting. Although the applicant adopts Historic Environment Scotland's recognised methodology for assessing effects on the setting of historic assets—a methodology developed and refined through consultation with Historic Environment Scotland—this approach mandates an evaluation of whether changes to setting affect the contribution setting makes to the cultural significance of heritage assets. Crucially, it requires consideration of whether the integrity of setting is adequately retained, emphasising that visual change alone should not be equated directly with adverse impact.

However, a published Methodological Audit, prepared entirely from the applicant's Appendix 14.3 and submitted in support of community objections, identifies significant shortcomings in the operational assessment. While the assessment identifies relevant heritage attributes and describes visual change in terms of visibility, distance, monument prominence, retained views, screening, and skyline occupation, it stops short of demonstrating how the integrity of setting has been evaluated in accordance with the applicant's own accepted methodology. The necessary evaluative step—assessing the effect of these visual changes on the cultural significance and integrity of setting—is absent in all of the examined examples.

In consequence, the assessment's conclusion that the integrity of setting is adequately retained lacks evidential foundation and cannot be relied upon. This methodological failure casts serious doubt on the credibility of the heritage impact conclusions presented by the applicant.

While the applicant's assessment acknowledges certain baseline cultural qualities of the heritage assets, it falls short in fully capturing the broader experiential and landscape values essential to their significance. The baseline records identify key attributes such as pilgrimage, arrival by sea, movement through a living cultural landscape, and the interrelationships between monuments, spirituality, and the encompassing landscape and seascape. These qualities are inherently dynamic and are experienced through movement rather than fixed viewpoints. Historic Environment Scotland's consultation responses, as documented in the application, underscore this shortcoming by requesting additional viewpoints to ensure these wider cultural attributes are properly represented. Without adequately addressing these aspects, the assessment risks underestimating the true heritage impacts, thereby weakening the foundation for effective mitigation measures.

The practical consequence of understating landscape effects is a corresponding understatement in the heritage impact conclusions. Since these heritage conclusions rely directly on the landscape assessment, any deficiencies or minimisations within that assessment inevitably carry over, undermining the overall credibility of the heritage evaluation. This interdependence means that if the landscape effects are not fully or accurately accounted for, the subsequent heritage conclusions cannot be considered robust or reliable.

While mitigation measures are referenced in the application, they fall short of the requirements set out in national policy for protecting heritage assets. Specifically, the proposal fails to comply with NPF4 Policy 7(h) concerning scheduled monuments, as well as Policies 7(c) and 7(d) related to the setting of heritage sites, in conjunction with GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. The applicant has not provided sufficient evidence to demonstrate that the cultural significance of internationally and nationally important heritage assets, along with their settings, will be safeguarded. Furthermore, Scottish Ministers have not been presented with the necessary assessment that such a conclusion would demand. In light of these shortcomings, the application cannot be considered compliant with the key policy requirements for heritage protection and therefore undermines its overall acceptability.

1.1.764 Effects on Island Communities, Tourism and the Local Economy

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

The applicant’s own consultants acknowledged that habitability represented a potentially significant pathway through which the proposal could impact island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 focuses primarily on regional-level analysis, providing detailed examination of potential port communities but omitting an equivalent place-based evaluation of the island communities directly facing the development. Notably, the assessment concludes that these island communities exhibit low sensitivity to tourism effects, a finding reached without targeted analysis of the unique circumstances of those islands.

It is important to recognise that small island economies cannot be accurately represented by regional averages. Such economies are typically concentrated in sectors that are highly susceptible to changes in the attributes attracting visitors. Rather than diminishing sensitivity, dependence on increasing visitor numbers intensifies reliance on the environmental and social qualities that may be jeopardised

by the proposal. Therefore, the conclusion of low sensitivity drawn without a place-specific assessment lacks evidential support and should be regarded as an unsubstantiated assumption.

Given these considerations, the socio-economic assessment's methodology falls short of providing a robust understanding of the potential impacts on island communities. A more nuanced, place-based approach is necessary to adequately capture the vulnerabilities and dependencies of these communities, thereby informing effective mitigation measures. Without such an approach, the assessment risks underestimating the true socio-economic consequences of the proposal for the affected island populations.

The applicant acknowledges that island communities require particular scrutiny in the planning process but has failed to undertake the necessary assessment to understand the proposal's effects on these communities. Despite this recognition, the evidence provided does not demonstrate that the proposal is compatible with the principles of sustainable island communities. Consequently, the applicant has not discharged the statutory duties owed to these communities, as required by the relevant policy and legislative framework.

This omission directly conflicts with the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions be based on sound socio-economic evidence and adopt a precautionary approach where such evidence is lacking. Furthermore, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 require that the interests of island communities be assessed and given appropriate weight through meaningful engagement from the inception to the conclusion of any proposal. The absence of such assessment and engagement means the proposal fails to meet required planning and statutory standards, thereby undermining the protection and sustainability of island communities.

1.1.765 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, while the adjacent waters provide habitat for seabirds, marine mammals, and basking sharks. The proposed project would entail construction, operation, and decommissioning activities on a very large scale, persisting over several decades, thereby introducing significant and prolonged disturbance to this ecologically sensitive environment.

Given the presence of these designated and protected marine features and species, the proposal raises considerable concerns regarding its potential to cause substantial adverse environmental effects. The ecological importance and sensitivity of the site and surrounding waters necessitate rigorous assessment to ensure that the integrity of these habitats and species populations is maintained.

The applicant's submission includes a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan, specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are indicative of mitigation efforts, aiming to address potential adverse effects on a protected site. Their presence in the application

suggests that the applicant acknowledges the possibility of significant impacts and has sought to propose measures intended to offset them.

However, it is important to note that such derogation and compensation documents are typically prepared for circumstances where an adverse effect on site integrity cannot be ruled out. The mere submission of these plans reflects a recognition that the applicant's assessment does not definitively exclude harm to the protected population. This introduces a degree of uncertainty regarding the effectiveness of the proposed mitigation measures and whether they will fully prevent negative consequences.

Furthermore, the applicant's approach implies that the final determination on potential adverse effects rests with the Scottish Ministers, who may arrive at a different conclusion. Consequently, while the submitted documents demonstrate a willingness to engage with the derogation process, this does not guarantee that the proposals will satisfy the necessary statutory tests or that the protected site's integrity will be maintained. It remains essential that these considerations are given due weight in the planning decision.

Consent for developments affecting protected habitats and species can only be granted where there is no reasonable scientific doubt that the integrity of the protected site will remain unaffected. Under the Habitats Regulations, the competent authority must be satisfied that the proposal will not adversely affect the site's integrity, except where strict derogation tests are conclusively met. This places a very high evidential burden on the applicant to demonstrate compliance. Importantly, measures such as mitigation, compensation proposals, or future monitoring alone do not suffice to meet the statutory tests. This stringent legal framework is reinforced by specific policy provisions, including GEN 9 and GEN 13 of the National Marine Plan, alongside Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. Given these requirements, any consent granted without unequivocal scientific certainty that the protected site's integrity will remain intact would be unlawful. Therefore, proposals must be rigorously assessed against these standards before any approval is considered.

There remains significant uncertainty regarding the applicant's ability to satisfy the statutory tests designed to protect internationally important habitats and species. The evidence submitted, including the applicant's own derogation documents, fails to provide the necessary degree of certainty that these critical legal requirements can be met.

This failure to demonstrate compliance with essential statutory protections fundamentally undermines the case for granting consent. Without clear assurance that the internationally important ecological features will be adequately safeguarded, it would be inappropriate to approve the application.

1.1.766 Public Engagement, Site Selection and Environmental Information

The applicant requests that Scottish Ministers place significant weight on the site-selection process; consequently, the quality of public participation in that process is directly material to the decision. However, there have been clear deficiencies in

participation not only at the plan and site-selection stages but persisting into the application stage. The application itself consists of many thousands of pages of technical material, yet the consultation period has coincided with the busiest months for island communities. During this time, residents are continuously engaged throughout the visitor season, and access to specialist advice is limited. This contrasts sharply with the applicant's position, having had years to prepare its case with substantial professional and financial resources.

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

The Environmental Impact Assessment submitted is insufficient to enable the Scottish Ministers to make an informed decision on the application. While the assessment covers a range of topics, it identifies potential significant effects without fully investigating them or employing methodologies that substantiate its conclusions. For instance, the landscape assessment presents outcomes based on a distance pattern not supported by its own stated methodology; the heritage assessment fails to demonstrate application of its integrity test; and the socio-economic assessment lacks any place-based analysis pertinent to the affected islands. Furthermore, the application frequently defers critical evaluation to future stages—post-consent plans, monitoring, and additional approvals—which does not satisfy the requirement under the EIA Regulations to understand likely significant effects prior to determination. It is imperative that the Scottish Ministers base their decision on the evidence currently before them, rather than on assumptions that outstanding issues will be adequately resolved later. Consequently, the applicant has not demonstrated that the environmental information provided meets the necessary adequacy standard.

1.1.767 Effects on Local Area

The applicant's assessment significantly underestimates the direct and substantial effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, calling into question the reliability of the overall environmental and heritage impact evaluation. Islay and Colonsay lie immediately adjacent to the proposed development area, which spans 448 square kilometres; yet Islay is primarily considered only as a potential project location rather than as an affected island community in its own right. This approach neglects the Atlantic-facing communities of Islay, which border the development's closest edge and lack any place-based assessment of impacts on their setting, local economy, or community life. Similarly, Colonsay and Oronsay face the development area directly across their seaward outlook, integral to their daily experience. The North Colonsay and Western Cliffs Special Protection Area, located on Colonsay's coastline, is the subject of the applicant's derogation case and compensation plan, implicitly acknowledging that harm to its internationally protected seabird population cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance within

this community, suffers from the same shortcomings identified elsewhere in the heritage assessment, particularly in relation to the evaluation of its open maritime setting. Taken together, these deficiencies demonstrate that the assessment fails to adequately address the significant and direct effects on these island communities and their heritage.

While the applicant's assessment acknowledges certain visual and community impacts on Iona, it nonetheless underestimates their scale and significance, particularly when compared to the mitigation measures proposed. The Coastal Character assessment attributes a High sensitivity to the Sound of Iona, noting its direct orientation towards the development and extensive visibility across a large geographical extent. The turbines would be visible over approximately 21 kilometres, spanning around 39 degrees of the horizon, producing an effect described as Moderate and Significant. Despite this, the proposed mitigation does not adequately address the pervasive visual intrusion experienced from key locations, including the ferry crossing between Fionnphort and Iona, which forms a vital arrival point and is integral to the island's sense of place.

The West Coast of Iona is similarly assessed as highly sensitive with widespread visibility, and the applicant accepts that significant effects will be experienced by residents and visitors across much of the island, including at Dùn Ì, its highest point. However, the evaluation falls short in capturing the full cultural and heritage significance of Iona's monastic landscape, which includes the Abbey, the Nunnery and the high crosses. This heritage is of international importance, with its significance intrinsically linked to pilgrimage, arrival by sea, and movement through the landscape, as identified in the applicant's own baseline studies. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet notably, no visualisation has been provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, leaving a critical gap in the assessment of visual impact on this internationally important heritage setting.

Furthermore, the social impact assessment appears incomplete, particularly in relation to the community on Iona itself. A household consultation revealed that 92 per cent of respondents object to the proposal, reflecting widespread local concern. The applicant's own consultants identify habitability as a potential pathway of effect on this community, yet this important consideration was never fully assessed. To contextualise the scale of the visual impact, the largest turbines would surpass the height of Ben Hynish on Tiree, a well-known landmark standing at 141 metres and visible from Iona at approximately 33 kilometres; the turbines would be approximately 194 metres tall and at roughly two-thirds of that distance. This comparison underscores the considerable and underappreciated magnitude of the proposed development's visual presence, which is likely to exacerbate the adverse effects on both the community and the heritage value of Iona.

The applicant's assessment of the effects on Mull and the Ross of Mull coastal communities and landscapes includes some acknowledgement of significant impacts; however, it falls short in fully addressing the scale and nature of these effects, particularly when compared to proposed mitigation measures. For example, while the assessment recognises significant effects at Erraid and on the Core Paths of the Ross, and concedes that Fionnphort—a vital gateway community for visitors to

Iona—would experience notable impact, the overall attribution of magnitude remains moderate. This moderate attribution contrasts with the high sensitivity of these areas, suggesting that the mitigation proposed may not sufficiently account for the depth of disruption to community experience and landscape character.

Across the wider extent of Mull, a similar pattern emerges. The applicant accepts significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is assessed as having high sensitivity throughout, with viewing distances ranging from 21 to 33 kilometres. Yet, the magnitude of impact is consistently rated no higher than medium. This discrepancy underlines a methodological approach reliant on distance to downplay the potential visual and experiential impacts. For instance, in the Wilderness and Gribun Rocks coastal area, the assessment dismisses the scale of change as small due solely to viewing distances exceeding 30 kilometres, a reasoning that appears insufficient to capture the character and quality of the seascape valued by communities and visitors alike.

Moreover, the assessment does not adequately address the economic and social importance of Mull's west-facing tourism economy, which relies heavily on the unspoiled Atlantic seascape that the development threatens to industrialise. Wildlife boat operations and the accommodation infrastructure within western townships are intimately connected to this environment, yet no place-based assessment has been conducted for these communities. In the absence of such detailed analysis, the full extent of harm to local livelihoods and the visitor experience remains unclear, raising concerns that the applicant's evaluation underestimates significant adverse effects. Therefore, a more thorough and sensitive approach is required to ensure that both the landscape and the communities dependent on it are properly considered in planning decisions.

The applicant's assessment of the proposed development significantly underestimates the extent and significance of effects on designated seaboard landscapes and adjacent island communities, with tangible consequences for their natural and cultural integrity. Notably, the community-owned island of Ulva, located within the Loch na Keal National Scenic Area, is omitted entirely from specific assessment despite sharing fully in the landscape effects. Ulva is a small, re-establishing community whose ongoing recovery depends critically on the preservation of its unspoilt seascape and setting—the very qualities threatened by the development. The absence of any targeted assessment for Ulva fails to acknowledge the practical implications for this vulnerable island community.

Similarly, the applicant's conclusions regarding nearby celebrated islands such as Staffa, also within the Loch na Keal National Scenic Area, appear insufficiently robust. Staffa lies approximately 35 kilometres from the development, beyond the 30-kilometre radius recommended by NatureScot for assessing effects on National Scenic Area qualities. Despite acknowledging the island's panoramic maritime qualities, the applicant discounts the scale of change as small and the effect as not significant. This approach does not fully reflect Staffa's status as one of Europe's most renowned small islands, nor does it recognise the potential cumulative impact on the wider seascape character that contributes to its designation.

Further afield, the assessment of the Jura National Scenic Area at 28 to 32 kilometres distance attributes a High sensitivity but limits the magnitude of change to Medium or Low, reasoning that distance and retained landforms moderate the impact. This reasoning is similarly applied to the Scarba, Lunga and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres from the development. However, the designation of these areas is fundamentally based on their wild, undeveloped Atlantic outlooks, qualities that may be compromised even by moderate changes in seascape character. Taken together, these considerations demonstrate that the applicant's assessment inadequately addresses the significance of effects on key seaboard landscapes and island communities, undermining the protection of their valued natural and cultural attributes.

The applicant's assessment concludes a Low magnitude of change on the South Tiree coastal area despite recognising its High sensitivity at approximately 35 kilometres distance. This practical conclusion severely understates the true extent of the impact on Tiree's landscape, resulting in an unreliable evaluation that could misinform decision-making and undermine effective mitigation.

Tiree's landscape character is exceptionally distinctive, defined by its low-lying terrain and the dominance of sea and sky. The island's highest point, Ben Hynish, rises to just 141 metres, reinforcing an open oceanic horizon free from vertical intrusions. Introducing turbines reaching up to 335 metres would represent a dramatic departure from this established seascape character, creating unprecedented vertical structures that would be highly conspicuous and discordant.

Given the fundamental role that openness and horizontality play in defining Tiree's landscape, the applicant's Low magnitude conclusion for such an exposed and sensitive receptor is fundamentally flawed. It significantly understates the magnitude of change and impact, thereby compromising the reliability of the assessment and the planning process that depends upon it.

The applicant's assessment notably omits consideration of significant effects on several mainland and island communities that have direct views of the proposed development and whose economies and identities are closely tied to the seascape. For instance, Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by residents, faces the development site from the east. The finely balanced nature of Gigha's community and economy means that any changes in the seascape could have profound implications; yet, these have not been examined in the submitted assessment. Similarly, Ardnamurchan Point, the most westerly point of the British mainland, offers panoramic views along the Hebridean seaboard which attract visitors throughout the peninsula. These seaward panoramas are precisely the type of receptor that the applicant's distance-based moderation approach fails to adequately address, as it diminishes the potential significance of visual and experiential effects at such key viewpoints. Furthermore, the west coast of Kintyre comprises a chain of communities whose outlook, character, and visitor economies are intimately defined by the open Atlantic seaboard looking towards Islay, Jura, and the surrounding waters. The Treshnish Isles, along with other small islands and mainland coasts in the vicinity with views towards the development, share this same position. Collectively, these receptors represent sensitive social and economic interests that are unaccounted for

in the applicant’s evaluation. This lack of assessment undermines the comprehensiveness and reliability of the overall environmental and socio-economic analysis, leaving a gap in understanding the full extent of the development’s potential impacts on these mainland and island communities.

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

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

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

1.1.768 Personal Observations

In addition to the planning matters above, I am personally concerned because: I go to Iona to paint (an artist), to regain my equilibrium. I cant imagine such a thing being off the coast of the inner hebridean islands and mainland without adversely affecting everything that makes the landscape a pe, seascape, and wildlife living on sea or land.

Based on my own local knowledge, I also wish to highlight that: Iona, Mull, Ardamurchan and the whole western coast have been unchanged for centuries and as a result are incredibly valuable to a region of the country that now lives on tourism.

Finally, I would also ask the Scottish Ministers to consider: I have dual citiizenship and maintain a residence in Glenfinnan. This is the first Ive heard of this project and the timing for comment.

1.1.769 Summary

The proposal fails to demonstrate compliance with the relevant statutory and policy frameworks governing its determination. Its own evaluation acknowledges

substantial impacts on nationally designated landscapes, as well as on the cultural heritage and communities along this coastline. Furthermore, published analyses of the applicant's documents reveal a consistent underestimation of the scale of these impacts. Crucially, the required heritage assessment has not been completed. Impacts on the island communities affected by the development were identified but have not been subjected to any formal assessment. Additionally, the ecological requirements have not been satisfactorily demonstrated as achievable. It is also important to note that only a portion of the project is currently under consideration by the Scottish Ministers.

In light of these shortcomings, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm proposal, along with the related marine licence application.

Should the Ministers be inclined not to refuse outright, I request that they require the submission of further environmental information and enhanced visual representations. Moreover, I recommend that the applications be determined only following a public inquiry, thereby allowing for comprehensive examination of the issues raised in this objection. Irrespective of the outcome, I further request that the Ministers explicitly address and provide clear conclusions in their decision documentation regarding the effects on cultural heritage and the impacted island communities.

Yours faithfully,

[Redacted]

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

Member of the public 582
Dear Sir/Madam,

I hereby submit a formal objection to the proposals for the MachairWind Offshore Wind Farm, relating to application numbers 00012385 and 00012386. These applications seek consent under section 36 of the Electricity Act 1989 and a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010, respectively, and have been put forward by MachairWind Limited, trading as ScottishPower Renewables. I request that this letter be recorded as an official objection, that my status as an objector be acknowledged, and that I receive notification of the final decision regarding these applications.

The project in question entails the development of an offshore wind farm with a generating capacity of approximately 2 gigawatts. This would consist of between 91 and 144 turbines, each with a maximum height of up to 335 metres to blade tip. The proposed site spans a Windfarm Development Area of roughly 448 square kilometres, located in the sea to the north-west of Islay and west of Colonsay. This area lies approximately 21 kilometres from the island of Iona and is in close proximity to various islands and coastal communities within the southern Hebrides.

My objection is grounded in both planning and environmental considerations, assessed within the statutory and policy frameworks applicable to the determination of these applications. It is important to emphasise that the responsibility lies with the applicant to provide sufficient and robust evidence demonstrating that all relevant statutory tests and policy requirements are met. The onus is not upon objectors to prove the contrary. In this case, as detailed in the following sections, the applicant has failed to meet this evidential burden. Consequently, I conclude that the applications should be refused consent.

1.1.770 Legislative and Policy Framework

The Islands (Scotland) Act 2018 mandates that the interests of island communities must be considered and given due weight in the decision-making process. In this case, the proposal fails to demonstrate compliance with this statutory requirement. The evidence identifies clear deficiencies and omissions in addressing the specific needs and interests of island communities as required by the Act. Such failures constitute a conflict with the applicable legal and policy framework. Consequently, these shortcomings weigh decisively against the granting of consent for the proposal.

1.1.771 Cultural Landscape, Archaeology and Historic Environment

The applicant’s assessment of heritage impacts fails to comply with the required methodology, thereby undermining the reliability of its conclusions regarding the integrity of setting. Although the applicant adopted Historic Environment Scotland’s recognised methodology—which mandates evaluating whether changes affect the contribution setting makes to cultural significance and whether the integrity of setting is adequately retained—it stops short of fulfilling these requirements in practice. The applicant’s assessment primarily describes visual changes, focusing on visibility, distance, monument prominence, retained views, screening, and skyline occupation.

However, as demonstrated by the Methodological Audit prepared in support of community objections, these descriptive elements do not amount to the critical evaluative step the methodology demands. The Audit, working solely from the applicant's Appendix 14.3, highlights that the assessment does not explicitly demonstrate how the integrity of setting has been assessed in accordance with the methodology. Without this essential evaluation, the conclusion that the integrity of setting is adequately retained lacks evidential foundation. Consequently, the assessment's failure to apply the methodology properly calls into question the validity of its heritage impact conclusions.

The practical consequence of the applicant's approach is that the assessment may underrepresent key aspects of the cultural significance of the heritage assets in question. The applicant's own baseline acknowledges that this significance arises not merely from static features but from dynamic qualities such as pilgrimage routes, arrival by sea, movement through an active cultural landscape, and the interrelationships among monuments, spirituality, and the encompassing landscape and seascape. These elements are experienced through movement rather than from fixed viewpoints, indicating a broader and more immersive cultural context that should be central to any impact evaluation.

Furthermore, Historic Environment Scotland's consultation responses, as recorded within the application, highlight this deficiency by requesting additional viewpoints to ensure these wider experiential qualities are properly represented. This suggests that the current assessment falls short of capturing the full scope of the heritage assets' cultural landscape. Without addressing these concerns, the appraisal risks providing an incomplete understanding of the heritage impacts, potentially leading to mitigation measures that do not fully respect or preserve the assets' cultural significance. It is therefore necessary to incorporate these broader landscape and experiential factors into the assessment to achieve a more comprehensive and accurate evaluation.

The practical consequence of relying on a landscape assessment that understates effects is that the heritage impact conclusions drawn from it become inherently unreliable. Where the landscape assessment fails to fully acknowledge the extent or significance of impacts, any subsequent heritage analysis that depends on that assessment will similarly minimize or overlook important consequences. This calls into question the overall robustness of the heritage conclusions presented.

Specifically, as noted in the evidence, the heritage conclusions are explicitly dependent upon the landscape assessment. Therefore, any understatement or omission within the landscape evaluation is inevitably carried forward, resulting in a cumulative understatement of effects on heritage assets. This interdependency means that deficiencies in the landscape assessment do not remain isolated but rather undermine the integrity of the entire heritage impact appraisal.

Given this dependency and the identified understatement of landscape effects, it is essential that the landscape assessment be revisited and revised to accurately reflect all significant impacts. Only then can the heritage conclusions be considered credible and reliable for planning purposes. Without such a reassessment, the

current heritage impact conclusions lack the necessary evidential foundation and should not be accepted as robust.

The practical consequence of the application's failure to adequately address heritage considerations is that it does not comply with essential policy requirements designed to safeguard important cultural assets. This deficiency directly undermines the acceptability of the proposal, as it leaves unresolved the potential harm to heritage sites of international and national significance. Without clear evidence that the cultural significance and settings of these assets will be protected, the proposal cannot be deemed consistent with the necessary standards for heritage conservation.

This issue engages several specific policies within the National Planning Framework 4 (NPF4), notably Policy 7(h) concerning scheduled monuments, as well as Policies 7(c) and 7(d) which address the setting of heritage assets. Additionally, the application must be considered in light of Policy GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan, all of which collectively establish a robust framework for protecting heritage in the planning process. The applicant's submission, however, fails to provide the required assessments or evidence demonstrating compliance with these policies.

Crucially, the Scottish Ministers are not presented with the necessary information to conclude that the cultural significance of these heritage assets and their settings would be preserved. This absence of a comprehensive assessment means the proposal does not meet the policy tests for heritage protection, thereby impeding the decision-making authority's ability to approve the application confidently. On this basis, the application falls short of meeting the statutory and policy obligations, leading to the conclusion that it should not be supported in its current form.

1.1.772 Effects on Island Communities, Tourism and the Local Economy

The proposal presents a clear and immediate risk to the economic foundation of the island communities, which rely heavily on visitors drawn by distinctive local qualities. The applicant's own baseline assessments acknowledge that visitors are attracted specifically by the landscape, seascape, cultural heritage, tranquillity and remoteness of these islands. Any alteration to these attributes would undermine the very reasons visitors choose to come.

This dependence on visitor-generated income is not merely an economic matter; it is intrinsically linked to the social fabric and viability of the communities. The local services that residents depend upon are sustained by this visitor economy. Should these qualities be diminished, a resulting decline in visitors would lead to reduced income, threatening the provision of essential services and potentially prompting population loss as livelihoods become unsustainable.

In sum, the proposal threatens to destabilise the fundamental economic and social sustainability of these island communities. Protecting the qualities that attract visitors is therefore critical to maintaining their continuing viability. Any development that compromises these key attributes risks undermining the communities' future as living, vibrant places.

The applicant's socio-economic assessment fails to provide an adequate understanding of the impacts on island communities, particularly when compared to the detailed evaluation of port communities. While the assessment recognises habitability as a potentially significant pathway affecting island communities, no subsequent place-based analysis of the islands' habitability was undertaken. Instead, Chapter 18 confines its detailed scrutiny to regional and port community impacts, ultimately concluding that island communities exhibit low sensitivity to tourism-related effects. This inconsistent approach undermines the robustness of the assessment and weakens any mitigation strategies proposed for these vulnerable communities.

Island economies are distinctive and cannot be accurately represented by regional averages. Their economic structure is heavily concentrated in sectors that are directly reliant on the attributes attracting visitors, making them inherently more sensitive to any changes affecting those qualities. Indeed, dependence on increasing visitor numbers intensifies, rather than diminishes, their vulnerability. Therefore, the applicant's conclusion of low sensitivity—arrived at without a proper place-specific analysis—is not supported by evidence but rests on an unfounded assumption. This methodological shortcoming calls into question the validity of the socio-economic assessment and the adequacy of proposed mitigations for the island communities concerned.

There remains significant uncertainty regarding the proposal's compliance with established policy and statutory duties concerning island communities. The requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan emphasise that decisions must be based on robust socio-economic evidence, applying a precautionary approach where such evidence is insufficient. Additionally, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 mandate that the interests of island communities are assessed thoroughly and afforded appropriate weight, with meaningful engagement from the earliest stages through to the final decision. This framework is designed to ensure that island communities, which often have distinct social and economic characteristics, are not overlooked or adversely impacted by development proposals.

However, the applicant has acknowledged the need for particular scrutiny of island communities but has failed to undertake the necessary assessment to understand the effects of the proposal on these communities. There is no demonstration that the proposal aligns with the principles of sustainable island communities, nor that the statutory duties towards these communities have been discharged. This lack of compliance with key policy and statutory requirements undermines confidence that the proposal can proceed without detrimental consequences to island communities. Accordingly, it is concluded that the application should not be approved in its current form, given its failure to meet the essential standards of assessment and protection for island communities.

1.1.773 Ecology, Biodiversity and Habitats Regulations

The proposed development would bring construction, operational, and decommissioning activities into an ecologically sensitive marine environment on a very large scale and for an extended period of several decades. This sustained

presence of industrial activity is likely to have significant adverse effects on the local ecosystem due to the scale and duration of disturbance.

The site itself contains Priority Marine Features and Annex I habitats, which are recognised for their ecological importance and vulnerability. Surrounding waters are also home to a range of protected species, including seabirds, marine mammals, and basking sharks. The presence of such habitats and species underscores the high environmental sensitivity of the area and the potential for the proposed development to cause substantial ecological disruption.

Given these factors, careful consideration must be given to the potential environmental impacts before proceeding. The scale of activity and the ecological value of the site and adjacent waters together indicate a significant risk of harm to protected habitats and species, which must be fully accounted for in the planning process.

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

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

The applicant acknowledges that under the Habitats Regulations, consent for developments affecting protected sites may only be granted where the competent authority has ascertained that the proposal will not adversely affect the integrity of the site, unless the stringent derogation tests are satisfied. It is emphasised that consent can lawfully be granted only where no reasonable scientific doubt remains regarding potential impacts. The burden of proof lies with the applicant to demonstrate this high evidential standard.

Furthermore, the applicant recognises that mitigation, compensation proposals, and future monitoring, while important, do not by themselves satisfy the statutory tests required under the Habitats Regulations. This rigorous approach ensures that all potential effects on protected habitats and species are thoroughly assessed before any consent is granted, reflecting the precautionary principle embedded within the legislation.

This legal framework is supported and reinforced by relevant policy provisions, including GEN 9 and GEN 13 of the National Marine Plan and Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. Together, these policies establish a comprehensive and robust framework to safeguard protected sites, ensuring that decisions on consent are made with the utmost regard to environmental protection and legal compliance.

The applicant's own derogation documents, together with the totality of evidence submitted, fail to demonstrate that the statutory tests designed to protect internationally important habitats and species can be met. This lack of certainty undermines the legal foundation required to grant consent, as the statutory safeguards exist precisely to ensure that such ecological features are not compromised. Consequently, the application does not satisfy the necessary legal criteria for protecting these internationally significant environmental assets.

1.1.774 Cumulative and In-Combination Effects

The practical consequence of considering only a portion of the project at this stage is that a comprehensive evaluation of its overall impacts is fundamentally undermined. The export cable corridor and the onshore transmission works, which are essential for the wind farm's operation, are not included in the current application but are instead deferred to future consenting processes. This fragmentation means that the Scottish Ministers are making decisions without full knowledge of the cumulative effects, potentially overlooking significant environmental and operational implications that only become apparent when all components are assessed together.

This approach runs counter to established legal principles governing environmental assessment. The courts, notably in the Raeshaw Farms case, have affirmed that a project must be assessed in its entirety rather than being divided into smaller parts whose individual impacts might appear less significant. By effectively "salami-slicing" the project, the current methodology diminishes the perceived scale and consequence of the development, which could result in inadequate mitigation measures and insufficient scrutiny of the project's true footprint and effects on the environment and local communities.

Therefore, it is imperative that the assessment process be reconsidered to encompass all interdependent elements of the project simultaneously. Only through a holistic evaluation can decision-makers fulfil their statutory duties and ensure that all potential impacts are properly identified, understood, and addressed. Failing to do so risks setting a precedent that undermines the integrity of the planning system and the protections it affords to the environment and public interest.

The cumulative impact assessment relies heavily on the baseline conditions established in the earlier Environmental Impact Assessment chapters. It is important to recognise that if the foundational assessments concerning landscape, heritage, and socio-economic factors have understated the severity of effects, then the cumulative assessment inevitably inherits these limitations. This results in a diminished baseline from which combined impacts are measured, thereby skewing the overall appraisal of cumulative effects.

Given this dependency, the cumulative effects presented must be viewed with caution. When the baseline underrepresents the true extent of environmental and social harm, the aggregation of impacts from the proposal alongside other existing, consented, and foreseeable developments will similarly be understated. This creates a misleading impression that the combined effects are less significant than they genuinely are, potentially leading to inadequate mitigation strategies.

In conclusion, the reliability of the cumulative impact assessment is compromised by these flawed baseline assumptions. Without accurate and comprehensive baseline data, the assessment does not fully capture the scale of combined effects, which risks underestimating the true consequences of development. It is therefore essential that these foundational assessments are revisited to ensure that cumulative impacts are properly understood and addressed.

The applicant has failed to demonstrate that the cumulative and in-combination effects of the proposal, including the deferred works, have been reliably identified and assessed, contrary to the requirements set out in GEN 21 and paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the Environmental Impact Assessment Regulations concerning project splitting. This omission undermines compliance with relevant planning policies and environmental regulations. Consequently, it is essential that the decision-making process expressly addresses the treatment of the deferred works to ensure a comprehensive and lawful assessment. Without this, the application remains incomplete and cannot be properly determined.

1.1.775 Public Engagement, Site Selection and Environmental Information

While the applicant requests that Scottish Ministers place significant weight on the site-selection process, it is essential to consider the shortcomings in public participation that undermine its legitimacy. The consultation period coincided with the busiest months for island communities, when residents are occupied with continuous work throughout the visitor season and access to specialist advice is limited. This timing contrasts sharply with the applicant’s extended preparation period, which has benefited from substantial professional and financial resources. Consequently, the affected communities have not been afforded a comparable opportunity to engage meaningfully with the extensive technical material submitted, which runs to many thousands of pages.

The principles enshrined in GEN 18 of the National Marine Plan, alongside those of the Aarhus Convention, explicitly require that affected parties have a realistic chance to participate in decisions of this significance. The conditions under which communities have been expected to respond clearly fall short of this standard. It is therefore imperative that Ministers take these deficiencies in public participation seriously when considering the representations made, recognising that the consultation process as conducted does not meet the required standards of effective engagement.

The Environmental Impact Assessment (EIA) submitted with this application constitutes the principal evidential basis for the Scottish Ministers’ determination. However, the issue is not the extent of the assessment but its sufficiency. The

application identifies potential pathways to significant environmental effects but fails to investigate them adequately or employs methodologies that do not substantiate the conclusions presented. For example, the landscape assessment's results reflect a distance-based pattern not supported by its own stated methodology; the heritage assessment does not evidence the application of its integrity test; and the socio-economic assessment lacks place-based analysis pertinent to the affected islands. Such deficiencies undermine the reliability of the environmental information provided.

Furthermore, the application relies on future assessments, post-consent plans, monitoring regimes, and additional approvals to address outstanding environmental matters. This approach conflicts with the requirements of the EIA Regulations, which mandate that likely significant effects be fully understood prior to determination. Scottish Ministers are obliged to decide based on the evidence currently before them rather than assumptions that unresolved issues will be satisfactorily settled subsequently. The applicant has not demonstrated that the environmental information submitted is adequate to enable an informed decision, rendering the EIA insufficient for the purposes of this application.

1.1.776 Effects on Local Area

The applicant's assessment significantly underestimates the direct and substantial effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Although Islay and Colonsay are the closest inhabited islands to the development area—which lies immediately north-west of Islay and west of Colonsay—the application primarily treats Islay as a potential project location rather than as a distinct island community likely to be affected. This approach fails to provide any place-based evaluation of how the 448 square kilometre development area, particularly its Atlantic-facing edge closest to Islay, might impact the island's setting, local economy, or community life.

For Colonsay and Oronsay, the shortcomings are equally pronounced. The seaward outlook that shapes daily life on these islands faces directly towards the development array, with Colonsay's coastline designated as the North Colonsay and Western Cliffs Special Protection Area. This area is central to the applicant's derogation case and compensation plan, implicitly acknowledging that harm to the internationally protected seabird populations there cannot be ruled out. Moreover, Oronsay Priory—a scheduled monument of national importance—lies within this community's vicinity, yet the heritage assessment fails to adequately address the effects on its open maritime setting. These gaps fundamentally undermine the reliability of the environmental and heritage impact evaluation presented in the application.

The practical consequence of the applicant's assessment is that it underestimates the scale and significance of the impacts on Iona's visual environment, community, and heritage assets, thereby compromising the accuracy of the overall environmental and social impact evaluation. The Coastal Character assessment identifies the Sound of Iona as having high sensitivity, with extensive visibility of the proposed development across a large geographical area of approximately 21 kilometres. The turbines would extend across roughly 39 degrees of the horizon, directly affecting the ferry crossing between Fionnphort and Iona. The West Coast of

Iona is similarly highly sensitive, with widespread visibility of the turbines and acknowledged significant effects for residents and visitors, including at Dùn Ì, the island's highest point. Such extensive visual influence is further emphasised when comparing the turbines to a familiar landmark: Ben Hynish on Tiree, which stands at 141 metres and is visible from Iona at 33 kilometres; the proposed turbines would exceed this height by approximately 194 metres, at around two-thirds of that distance, indicating a much more dominant visual presence than has been conveyed.

In addition to visual effects, the applicant's assessment fails to adequately account for impacts on Iona's internationally important monastic landscape, including the Abbey, the Nunnery, and the high crosses, whose significance is intrinsically linked to pilgrimage, arrival by sea, and movement through the surrounding landscape. Despite Historic Environment Scotland's request for additional viewpoints—including from the ferry crossing itself—no visualisation has been provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, a location critical to understanding the heritage context. Moreover, a household consultation on Iona revealed that 92 per cent of respondents object to the proposal, highlighting widespread local concern. Crucially, the applicant's own consultants identified habitability as a potential pathway of effect on this community, yet no assessment of this impact has been undertaken. Taken together, these omissions and underestimations call into question the reliability of the applicant's environmental and social impact conclusions with respect to Iona.

The practical consequence of the applicant's assessment is a significant underestimation of the visual and community impacts on Mull and the Ross of Mull coastal areas, which are integral to the region's tourism economy. The Ross of Mull South coastal area, recognised for its High sensitivity at distances of 22 to 24 kilometres, is attributed only a Medium magnitude of effect, despite the applicant accepting significant impacts at Erraid and on the Core Paths of the Ross. Notably, Fionnphort, the gateway to Iona and primary embarkation point for visitors, is acknowledged as experiencing significant effects, yet the broader community implications bound to the flow of visitors remain inadequately addressed. Similarly, across Mull, significant effects on Core Paths and within the Central, South and West Mull Local Landscape Area are accepted, and the Loch na Keal National Scenic Area, a designation of High sensitivity at approximately 21 to 33 kilometres, is attributed no more than Medium magnitude. This disparity suggests a disconnect between recognised sensitivity and the scale of attributed effects, potentially diminishing the perceived impact on these tourism-dependent communities and landscapes.

Further illustrating the limitations of the assessment is the treatment of the Wilderness and Gribun Rocks coastal area, where the applicant's reliance on viewing distance—over 30 kilometres—is used to justify judging the scale of change as small. This distance-based reasoning fails to adequately reflect the qualitative and economic significance of the landscape, particularly given the dependence of Mull's west-facing tourism economy on the Atlantic seascape. Wildlife boat operations and the accommodation infrastructure supporting western townships would be affected by the industrialisation of these seascapes, yet none of these communities have been afforded a place-based assessment. This omission undermines a

comprehensive understanding of the development's impact, risking adverse consequences for both the landscape character and the economic vitality of these coastal communities.

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

Further concerns arise regarding other significant islands within the same National Scenic Area. Staffa, one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development site—beyond the 30 kilometre limit to which NatureScot recommended assessing effects on National Scenic Area qualities. The applicant concludes that any changes at Staffa would be small and not significant, a judgment that appears inconsistent with their own acceptance of the island's panoramic maritime qualities. Similarly, the Jura National Scenic Area, recognised for its wild and undeveloped Atlantic character, is assessed as having only Medium to Low magnitude effects despite its High sensitivity and proximity of 28 to 32 kilometres. This moderation is attributed to distance and retained landforms, yet it fails to adequately reflect the intrinsic value of Jura's outlook that underpins its designation.

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

When comparing the assessment of effects on Tiree with other instances where mitigation has been carefully considered, it becomes apparent that the applicant's evaluation significantly understates the magnitude of change. The South Tiree coastal area is classified as having High sensitivity at a distance of approximately 35 kilometres, yet the assessment assigns it a Low magnitude of change. This discrepancy raises concerns about the reliability of the evaluation, given the known sensitivity of the landscape and its exposure to visual impacts.

Tiree's landscape character is distinctive and particularly sensitive due to its exceptionally low-lying nature. The island's defining features are the dominance of sea and sky, with the highest elevation, Ben Hynish, reaching only 141 metres. Against this backdrop, the introduction of turbines up to 335 metres tall would represent a substantial and unprecedented vertical intrusion into the seascape. Such

structures would starkly contrast with the existing open oceanic horizon, fundamentally altering the visual and experiential qualities that define Tiree's landscape character.

Given these factors, concluding a Low magnitude of change for such a sensitive receptor underrepresents the true scale of impact. The assessment's understatement risks undermining the credibility of its findings and overlooks the significant implications for Tiree's landscape character. A more accurate and rigorous evaluation is necessary to ensure that the effects are properly understood and addressed in the planning process.

The practical consequence of the applicant's failure to assess the effects on certain mainland and island communities is a significant omission that undermines the overall robustness of the environmental and seascape impact evaluation. Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by residents, faces the waters of the proposed development from the east. The finely balanced nature of Gigha's community and economy means that any visual or environmental impacts could have disproportionately adverse effects. Yet, these have not been examined, leaving a critical gap in understanding the full scope of potential harm. Similarly, Ardnamurchan Point—the most westerly point on the British mainland—offers panoramic views along the Hebridean seaboard that are a key attraction for visitors. These seaward panoramas represent exactly the types of receptors that the applicant's distance-based moderation approach seeks to diminish, resulting in a likely underestimation of visual and experiential impacts in this area.

Further along the west coast of Kintyre, a chain of communities rely on the open Atlantic seaboard views towards Islay, Jura, and the surrounding waters, which define their local character and sustain their visitor economies. This is not a unique situation; the Treshnish Isles and other small islands, as well as mainland coasts with views towards the development site, occupy a similar position in terms of their visual and economic relationship with the seascape. The omission of these communities and their reliance on the seascape from the assessment compromises the comprehensiveness and accuracy of the applicant's evaluation. Without this inclusion, the potential cumulative and indirect effects on these important receptors remain unquantified, raising concerns about the adequacy of mitigation measures and the sustainability of local economies dependent on seascape quality.

There remains considerable uncertainty regarding the adequacy of the applicant's approach to assessing effects beyond the 20-kilometre radius. The evidence indicates a systematic pattern whereby any identified sensitive receptor located beyond this distance is subject to a moderated magnitude of change and a corresponding discounting of the effect. This raises significant concerns about whether the true scale and severity of impacts on these distant communities have been fully captured or appropriately evaluated within the environmental impact assessment.

Taken together, the identified locations exemplify a consistent proposition: the applicant's methodology effectively diminishes the significance of effects on highly sensitive receptors beyond approximately 20 kilometres, while those communities

themselves have not been afforded any detailed, place-specific consideration. Such an approach undermines the integrity of the assessment by failing to account for the lived experience and potential vulnerability of these populations. It is therefore essential that the decision-making process recognises this limitation and seeks further, more comprehensive appraisal to ensure that all significant effects are properly identified and addressed.

1.1.777 Personal Observations

In addition to the planning matters above, I am personally concerned because: As part of a global community and a steward of the ecology in my local and global habitat I feel this proposal will have a negative impact. I would like to protect the sensitive ecology of the area affected by this proposal for the present time and into perpetuity. I feel this proposal will be destructive and is unnecessary.

Based on my own local knowledge, I also wish to highlight that: All the wildlife, which cannot speak for itself, needs protection from destruction of its natural habitat. The local communities will be negatively impacted as well. I value all the wildlife and the native people and their communities and the monasteries as well as the beauty of the landscape.

Finally, I would also ask the Scottish Ministers to consider: I would like the Scottish Ministers to take into account the invaluable quality of the wildlife, landscape, history and communities that will be negatively and permanently impacted by this proposal and to not think only of the temporary monetary gains. The proposal a wasteful and destructive. Please let this proposal die and let the wildlife, communities and landscape live. Protect do not destroy.

1.1.778 Further Comments

May God give you wisdom.

1.1.779 Summary

The proposal submitted fails to demonstrate compliance with the relevant statutory and policy frameworks governing its determination. The applicant’s own assessment acknowledges significant impacts on nationally designated landscapes, as well as on the coastal communities and their heritage. Furthermore, analysis of the applicant’s published documents reveals that these impacts have been understated. Crucially, the necessary heritage assessment has not been undertaken. Although the effects on the island communities affected by the project were identified, they have never been properly evaluated. Additionally, the ecological criteria required for consent have not been proven achievable. It should also be noted that only a portion of the development is currently before the Scottish Ministers for consideration.

In light of these deficiencies, it is respectfully urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm proposal, along with the associated marine licence application.

Should the Ministers decide against refusal, it is requested that they require the submission of further environmental information and enhanced visualisations. It is also recommended that the applications be determined only following a public inquiry, during which the issues raised in this objection can be thoroughly scrutinised. Regardless of the final decision, it is further requested that the Ministers explicitly state their conclusions concerning the impacts on cultural heritage and the affected island communities within their stated reasons.

Yours faithfully,

[Redacted]

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

Member of the public 583
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, detailed in application references 00012385 and 00012386. These applications, lodged by MachairWind Limited (ScottishPower Renewables), seek consent under section 36 of the Electricity Act 1989 and a marine licence under Part 4 of the Marine (Scotland) Act 2010, respectively. I request that this letter be recorded as an official objection, that I be entered on the register of objectors, and that I receive notification of the final determination of these applications.

The project under consideration involves the construction of an offshore wind farm with a generating capacity of approximately 2 gigawatts. It proposes between 91 and 144 turbines, each with a maximum blade tip height of 335 metres, situated within a designated Windfarm Development Area spanning roughly 448 square kilometres of marine environment. This site lies to the north-west of Islay and west of Colonsay, at an approximate distance of 21 kilometres from Iona, and is in close proximity to the southern Hebridean islands and nearby coastal communities.

My opposition is founded upon comprehensive planning and environmental grounds, assessed within the context of the applicable statutory and policy framework governing these applications. It is important to emphasise that the onus lies entirely with the applicant to provide robust evidence demonstrating that all relevant planning and environmental tests are met. Objectors are not obliged to substantiate contrary claims. In this instance, the applicant has failed to meet that evidential burden. For the reasons outlined herein, consent should be withheld.

1.1.780 Legislative and Policy Framework

The application fails to demonstrate adequate compliance with the statutory duties under Schedule 9 of the Electricity Act 1989, particularly in relation to the requirement to take reasonable steps to mitigate adverse effects on natural beauty, flora, fauna, geological or physiographical features of special interest, and sites, buildings, or objects of architectural, historic, or archaeological interest. Schedule 9 explicitly mandates that both the applicant and the Scottish Ministers must have regard to these considerations and ensure that any negative impacts are reasonably mitigated.

In this case, the evidence does not establish that the applicant has sufficiently addressed these duties. There is a clear absence of demonstrated mitigation measures that would reasonably reduce or offset the adverse effects arising from the proposal on the protected interests identified by Schedule 9. Furthermore, the application contains deficiencies and omissions in its assessment and mitigation strategy, failing to align with the legal and policy framework set out by the Electricity Act 1989.

Given that compliance with these statutory duties has not been shown, and the application exhibits conflicts with the applicable legal requirements, these shortcomings must weigh decisively against the granting of consent. The proposal,

as submitted, does not meet the necessary statutory threshold for approval under Schedule 9 of the Electricity Act 1989.

The marine licence application under consideration is required to be determined in accordance with Part 4 of the Marine (Scotland) Act 2010 and must comply with Scotland's National Marine Plan unless relevant considerations indicate otherwise. The statutory framework explicitly mandates adherence to the General Policies set out in the National Marine Plan, including but not limited to GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts). These policies collectively form an integral part of the statutory assessment process for the marine licence application.

However, the evidence before the determining authority does not demonstrate compliance with these statutory requirements and relevant policies of the National Marine Plan. The application fails to provide sufficient evidence to satisfy the criteria set out in the General Policies, resulting in identifiable deficiencies and omissions in the assessment of impacts on the historic environment, landscape, natural heritage, and cumulative effects. Furthermore, the application does not adequately address the requirements for meaningful engagement as stipulated under GEN 18, nor does it present sound evidence in accordance with GEN 19. These shortcomings represent clear conflicts with the applicable legal and policy framework governing marine licence determinations.

Given the absence of demonstrated compliance and the presence of substantive evidential shortcomings, the application does not meet the statutory test required under the Marine (Scotland) Act 2010 and the National Marine Plan. As established by the statutory guidance, where compliance has not been demonstrated or where deficiencies and conflicts exist, these matters must weigh against the granting of consent. Therefore, on the basis of the evidence presented, the marine licence application should be refused.

The proposal fails to comply with key policies of National Planning Framework 4 (NPF4), which is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. Specifically, the application does not demonstrate compliance with Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy), all of which are directly engaged by this proposal.

Policy 3 requires that developments protect and enhance biodiversity. The evidence submitted with the application does not establish that biodiversity impacts have been adequately assessed or mitigated, resulting in a failure to demonstrate compliance with this policy. Similarly, Policy 4 mandates the safeguarding of natural places, yet the proposal omits necessary evaluations and protections for the natural environment affected by the development. This omission constitutes a clear deficiency in meeting the policy's requirements.

Policy 7 concerns the protection of historic assets and places. The application lacks sufficient evidence to confirm that the proposal will not adversely affect designated or undesignated heritage assets. Without this assurance, the proposal conflicts with the statutory and policy framework designed to preserve historic environments.

Finally, Policy 11 addresses energy considerations, including the efficient use of energy and the integration of renewable energy sources where appropriate. The application fails to provide adequate information or demonstrate compliance with these energy policies, representing a further shortfall against NPF4 requirements.

Where compliance with these policies has not been demonstrated, and where the evidence identifies deficiencies, omissions, or conflicts with the applicable legal and policy framework, these matters weigh decisively against the granting of consent. Given the absence of demonstrated compliance with Policies 3, 4, 7, and 11 of NPF4, the proposal is contrary to the statutory and policy framework and should be refused planning permission.

The proposal must be refused because it fails to provide the required environmental impact assessment and habitats regulations assessment as mandated by law. Under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, the likely significant environmental effects of the development must be identified, assessed, and reported prior to any determination. This statutory requirement has not been met. Furthermore, the Habitats Regulations mandate that the effects of the proposal on European protected sites be assessed in accordance with the applicable statutory tests. The evidence before the authority does not demonstrate compliance with these obligations. Where such compliance is absent, or where deficiencies, omissions, or conflicts with the legal and policy framework are evident, these factors must weigh decisively against granting consent. In this case, the failure to conduct and present adequate assessments constitutes a clear breach of statutory requirements and justifies refusal of the application.

The proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018, resulting in a fundamental procedural and substantive deficiency. The Act explicitly requires that the interests of island communities be taken into account and given due weight during the decision-making process. This statutory obligation is not a discretionary matter but a legal requirement that must be demonstrably fulfilled.

In this case, there is no evidence that the proposal has adequately addressed or incorporated the specific needs, circumstances, or concerns of the island communities affected. The absence of such consideration constitutes a clear omission and a failure to comply with the statutory framework established by the Islands (Scotland) Act 2018. Where compliance with this legal duty has not been demonstrated, or where the evidence reveals deficiencies or omissions in addressing the interests of island communities, these shortcomings weigh decisively against the granting of consent.

Given the statutory imperative and the lack of demonstrated compliance, the proposal should be refused on the grounds that it does not meet the requirements of

the Islands (Scotland) Act 2018. The failure to properly consider and give due weight to island communities' interests is a material defect that undermines the lawfulness and soundness of the decision-making process.

The applicant bears the responsibility of demonstrating, through robust, objective and proportionate evidence, that every relevant statutory duty, planning policy and environmental assessment requirement has been satisfied. In this case, the applicant has failed to meet this evidential burden. The submitted documentation does not provide sufficient proof that all legal and policy obligations have been complied with. Furthermore, the evidence reveals deficiencies and omissions that directly conflict with the applicable legal and policy framework. As a result, these unresolved matters weigh decisively against the granting of planning consent.

1.1.781 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to satisfy the impact criteria set forth in NPF4 Policy 11, which explicitly governs the conditions under which renewable energy developments may proceed. While Policy 11 endorses renewable energy projects, this support is conditional upon compliance with specific impact requirements, notably those concerning the effects on communities (Policy 11(c)) and on landscape, seascape, and other receptors (Policy 11(d) and 11(e)). The evidence demonstrates that the proposal would result in significant adverse effects on nationally designated landscapes and seascapes. Moreover, it has not been substantiated that the cultural significance of scheduled monuments and their settings would be adequately protected, nor that the interests and wellbeing of island communities would be safeguarded. The ecological assessments provided have similarly failed to demonstrate that the requisite environmental tests can be met.

These shortcomings collectively indicate that the proposal is in clear conflict with the impact criteria of NPF4 Policy 11. The adverse effects on nationally protected landscapes and seascapes alone constitute a material consideration against the development. The absence of robust evidence to protect the cultural heritage assets and to safeguard island communities further undermines the proposal's compliance with Policy 11. Equally, the failure to meet ecological standards raises significant concerns about the sustainability of the project. Taken together, these factors strongly suggest that the proposal cannot be supported under the policy framework intended to ensure renewable energy developments proceed without unacceptable harm.

The proposal fails to comply with multiple National Planning Framework 4 policies designed to protect nationally important landscapes, heritage assets, and biodiversity. Specifically, it conflicts with Policy 11, which operates alongside Policy 4(c) and 4(d) to safeguard National Scenic Areas and other nationally important landscapes from significant adverse effects on their designated qualities. Additionally, it does not meet the requirements of Policy 7, including Policy 7(h) relating to scheduled monuments and Policies 7(c) and 7(d) concerning the setting of historic assets. Furthermore, the proposal does not demonstrate adequate protection for island communities as required, nor does it satisfy the ecological tests set out in Policy 3 on biodiversity. Taken together, these shortcomings indicate that the proposal would cause significant adverse effects on nationally designated

landscapes and seascapes, fail to protect the cultural significance of scheduled monuments and their settings, and fall short in safeguarding the natural environment in accordance with NPF4.

The proposal's adverse impacts on landscape, heritage, and community interests, as protected by the Argyll and Bute Local Development Plan 2, indicate a clear conflict with the terrestrial development plan framework. This conflict arises notwithstanding any mitigation measures, which have not been shown to adequately address these effects. Consequently, the proposal is inconsistent with both the local development plan and the National Planning Framework 4 when considered in their entirety, and the applicant has failed to demonstrate otherwise.

1.1.782 Seascape, Landscape and Visual Effects

The applicant's assessment methodology fails to define a distance threshold beyond which major effects cease, yet their own analysis reveals a consistent pattern: no highly sensitive receptor beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of sensitivity or visibility. This is evident in the applicant's documentation, which notes that for a coastal area over 30 kilometres away, the scale of change is judged small due to viewing distance, and the Landscape Character synthesis categorises magnitude as High within about 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. Consequently, the protective tests rely on inputs that systematically moderate magnitude at precisely the distances where the most sensitive designated landscapes are situated. This undermines the reliability of the conclusions presented to the Scottish Ministers, as the true effects on these landscapes are likely understated.

The applicant's evidence draws on NatureScot's visualisation guidance, which recognises inherent limitations in the use of printed visual materials to represent proposed developments. Specifically, it is acknowledged that such visualisations cannot fully replicate the scale as perceived by a viewer on site. This fundamental constraint affects the reliability of visual assessments that depend on photographic panoramas.

Furthermore, wireline drawings incorporated within these panoramic projections carry similar limitations. As noted, they are technical renderings integrated within the visualisation process rather than independent tools that might correct or enhance the photographic images. This means they do not provide an objective or definitive measure of visual impact but rather serve as an adjunct to the photographic evidence.

Taken together, these points suggest that visualisation materials, while useful, have technical and perceptual shortcomings that should be carefully considered in the assessment process. The reliance on such materials must be balanced with an understanding of their constraints to ensure that conclusions drawn about visual effects are appropriately qualified.

The applicant's evidence acknowledges that the proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit,

resulting in a permanent alteration of the night-time seascape character throughout the stated 35-year operational life. This fundamental change would transform the visual experience of the seascape after dark, introducing new and continuous light sources where none presently exist.

Furthermore, the temporal limitation of 35 years does not mitigate the policy implications of this harm. Consent for the development would signify a policy judgement that the seascape is appropriate for wind farm use, thereby accepting the permanent alteration to its character. This recognition underscores the lasting significance of the lighting effects on the night-time seascape, beyond the operational timeframe.

The proposal, as currently presented, fails to comply with key planning policies designed to safeguard nationally important landscape and seascape interests, resulting in significant practical consequences for the area's environmental integrity. This non-compliance undermines the purpose of these policies, which seek to manage and mitigate adverse effects on valued natural settings. Without adherence to these requirements, the proposal risks causing unacceptable harm to the character and quality of the landscape and seascape, contrary to the intentions of the planning framework.

The applicant’s assessment has not satisfactorily demonstrated that its conclusions regarding the scale of the identified effects align with the methodology it employed. This inconsistency calls into question the reliability of the evaluation and the robustness of any mitigation measures proposed. As a result, there is insufficient evidence to confirm that the project respects the protections afforded by the National Planning Framework 4 (NPF4) Policies 4(c), 4(d), 11(d), and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively aim to ensure that development proposals do not compromise the integrity of nationally significant landscapes and seascapes.

Given these shortcomings, the proposal does not meet the established policy requirements intended to preserve the environmental and visual qualities of the area. To proceed without resolving these issues would be inconsistent with the planning framework’s objectives and could set a concerning precedent for future developments in sensitive locations. Therefore, it is necessary for the proposal to be reconsidered and revised to demonstrate full compliance with the relevant policies before any approval can be justified.

1.1.783 Cultural Landscape, Archaeology and Historic Environment

The applicant’s assessment fails to demonstrate compliance with the required methodology for evaluating the impact on the setting of historic assets, thereby undermining the reliability of its conclusions regarding heritage effects. Although the applicant adopts Historic Environment Scotland’s established methodology, which mandates an evaluation of whether changes to setting affect the contribution setting makes to cultural significance and whether the integrity of setting is adequately retained, the assessment does not follow through on this crucial evaluative step. Instead, it focuses primarily on describing visual changes—considering factors such as visibility, distance, monument prominence, retained views, screening, and skyline

occupation—before asserting that the integrity of setting is adequately retained. A Methodological Audit, based solely on the applicant's Appendix 14.3, confirms that while heritage attributes are identified, there is no clear demonstration of how the integrity of setting has been assessed in accordance with the applicant's own accepted methodology. Without this critical evaluation, the assessment's conclusions about heritage impacts lack the necessary evidential foundation.

The practical consequence of overlooking the broader cultural landscape and experiential qualities in the heritage impact assessment is that the full significance of the affected assets may not be adequately understood or protected. The applicant's own baseline acknowledges that the cultural value arises not merely from individual monuments but from pilgrimage routes, arrival by sea, and the dynamic experience of moving through a living cultural landscape. This includes the interrelationships between monuments, spirituality, and the encompassing landscape and seascape, which are appreciated through movement rather than static viewpoints.

Despite this recognition, Historic Environment Scotland's consultation responses, as recorded in the application, highlight a shortfall in the assessment by requesting additional viewpoints to properly represent these wider qualities. This indicates that the applicant's evaluation may lack the necessary comprehensiveness to capture the full extent of cultural significance, thereby risking an incomplete understanding of heritage impacts. Such gaps could undermine the careful preservation of the heritage assets' experiential and contextual values.

The practical consequence of the shortcomings identified in the landscape assessment is that the subsequent heritage impact conclusions cannot be regarded as fully reliable. Since the heritage conclusions are directly dependent on the landscape assessment, any understatement of landscape effects inevitably results in a corresponding understatement within the heritage evaluation. This dependency means that the heritage impact findings are compromised to the extent that the landscape assessment fails to accurately capture the true magnitude of effects.

In this context, the evidence clearly indicates that where landscape effects have been understated as previously outlined, the heritage conclusions built upon these findings inherit the same deficiency. This linkage undermines the credibility of the heritage impact assessment and suggests that a more robust and comprehensive landscape analysis is essential to support sound heritage conclusions. Without addressing these deficiencies, the planning authority risks making decisions based on incomplete or misleading information regarding the potential heritage impacts.

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

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

1.1.784 Effects on Island Communities, Tourism and the Local Economy

The proposal presents a significant threat to the fundamental economic and social sustainability of the island communities affected. These communities rely exceptionally heavily on visitors, who are drawn to the very qualities identified in the applicant's own baseline assessments: landscape, seascape, cultural heritage, tranquillity, and remoteness. Any alteration to these attributes would directly undermine the economic foundations upon which these communities depend.

Such impacts would extend beyond mere economic considerations, affecting essential local services, population stability, and the overall viability of the island settlements. In compromising the qualities that attract visitors, the proposal risks destabilising the social and economic fabric of these communities, thereby threatening their long-term sustainability.

The applicant's own consultants acknowledged that habitability represents a potentially significant pathway through which the proposed development could impact island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 addresses impacts primarily at a regional scale, focusing in detail on potential port communities but failing to provide an equivalent place-based evaluation of the island communities directly facing the development. Notwithstanding this lack of targeted analysis, the assessment nonetheless concludes that those island communities exhibit low sensitivity to tourism effects.

This approach overlooks critical distinctions between small island economies and broader regional averages. Small island economies are concentrated in sectors that are particularly vulnerable to alterations in the qualities that attract visitors. Far from mitigating sensitivity, a reliance on increasing visitor numbers actually intensifies dependence on these at-risk qualities. Therefore, the conclusion of low sensitivity drawn without a place-based analysis cannot be regarded as evidence but must be seen as an unsubstantiated assumption.

Given these significant methodological shortcomings, the socio-economic assessment does not provide a reliable understanding of the potential impacts on island communities. A more nuanced, place-specific evaluation is necessary to accurately assess and mitigate the effects of the proposed development on these sensitive economies. Without this, the assessment falls short of informing appropriate planning decisions regarding the proposal's effects on island communities.

The proposal falls short in meeting the required planning and statutory standards for assessing and protecting island communities, particularly when measured against the obligations set out in GEN 19 and paragraph 4.81 of the National Marine Plan. These provisions mandate that decisions must be based on robust socio-economic evidence and adopt a precautionary approach where such evidence is insufficient. Furthermore, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 impose a clear duty to assess and give weight to the interests of island communities through meaningful engagement throughout the decision-making process. In contrast to these requirements, the applicant has failed to undertake the necessary detailed assessment to understand the specific effects of the proposal on island communities.

This deficiency is not a mere procedural oversight but a substantive failure to demonstrate compatibility with the sustainability of island communities or to discharge the statutory duties owed to them. The applicant's recognition that island communities require particular scrutiny is not matched by the evidence or engagement provided. Without the appropriate assessment and meaningful consultation from inception to conclusion, the proposal cannot be deemed compliant with the statutory and policy framework designed to safeguard island communities. Consequently, the application should be regarded as non-compliant with essential planning policies and statutory duties.

1.1.785 Ecology, Biodiversity and Habitats Regulations

The proposed development area encompasses Priority Marine Features and Annex I habitats, which are recognised for their ecological sensitivity and importance. Additionally, the surrounding marine environment supports a range of protected species, including seabirds, marine mammals, and basking sharks. Given the presence of these features and species, any construction, operational, and decommissioning activities must be carefully considered to avoid significant adverse environmental effects. However, the scale and duration of the proposed activities—spanning decades—present a substantial risk of disturbance and habitat degradation that cannot be readily mitigated to an acceptable level.

While mitigation measures may reduce certain impacts, the introduction of large-scale development activity into such a sensitive ecological context is inherently problematic. The Priority Marine Features and Annex I habitats within the development footprint are of high conservation value, and the surrounding waters serve as critical habitat for protected species. The cumulative effects of prolonged construction and operational disturbance could lead to lasting damage, undermining the ecological integrity of the site and adjacent marine environment. Therefore, the potential environmental consequences weigh heavily against the proposal's acceptability in its current form.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically addressing the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are typically prepared in circumstances where it is not possible to exclude an adverse effect on the integrity of a protected site. The very inclusion of such materials within the application highlights the applicant's recognition of potential impacts on designated environmental interests.

It is important to note that the submission of these derogation and compensation documents indicates a precautionary approach by the applicant, acknowledging that the proposed development may affect the protected guillemot population. By providing these plans, the applicant seeks to demonstrate a commitment to mitigating any such impacts should the competent authority, in this case the Scottish Ministers, determine that an adverse effect on site integrity cannot be ruled out. This approach reflects an understanding that the Scottish Ministers may reach a different conclusion regarding the potential for harm than the applicant has presented.

The presence of these documents as part of the application is therefore a significant feature, as it signals preparedness to address and manage any identified adverse effects through derogation provisions and compensatory measures. This submission aims to ensure that, in the event of an adverse effect being confirmed, appropriate steps will be taken to protect the guillemot population and maintain the overall integrity of the North Colonsay and Western Cliffs Special Protection Area.

Consent for developments affecting protected habitats and species can only be lawfully granted if the competent authority is satisfied beyond reasonable scientific doubt that the proposal will not adversely affect the integrity of the protected site. This requirement means that unless the strict derogation tests set out in the Habitats Regulations are met, development permission must be refused. Applicants bear the full burden of proving compliance with these statutory tests; reliance solely on proposed mitigation, compensation measures, or future monitoring cannot by themselves demonstrate that the legal standards have been satisfied.

This legal framework is reinforced by national planning policies, including GEN 9 and GEN 13 of the National Marine Plan and Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). Together, these policies reflect the stringent evidential and procedural requirements embedded within the Habitats Regulations, ensuring that protection of designated sites and species is paramount in decision-making processes. The policy regime demands a high level of scientific certainty before development consent can be responsibly granted.

In light of these obligations, any planning application proposing development with potential impacts on protected habitats must present robust, unambiguous evidence demonstrating no adverse effect on site integrity. Failure to meet this exacting standard must result in refusal of consent to comply with legal and policy mandates. This approach safeguards the ecological importance of protected sites and upholds the statutory framework governing habitat conservation.

The applicant’s submitted evidence, notably their own derogation documents, reveals a significant shortfall in demonstrating compliance with the statutory tests designed to protect internationally important habitats and species. The degree of certainty provided is insufficient to satisfy these legal requirements, as acknowledged within the applicant’s documentation itself. This failure directly undermines the fundamental protections afforded to such ecological features under the relevant statutory framework.

Given the applicant’s inability to meet these critical legal standards, the application cannot be considered compliant with the statutory safeguards intended to preserve

internationally important ecological assets. Consequently, the case for granting consent is fundamentally weakened, as the necessary assurances for environmental protection remain unsubstantiated. It is therefore appropriate to conclude that consent should not be granted in the absence of clear demonstration that these statutory tests have been satisfied.

1.1.786 Cumulative and In-Combination Effects

The practical consequence of the current assessment approach is that the Scottish Ministers are only considering part of the project, while critical components such as the export cable corridor and the onshore transmission works have been deferred to future applications. Without these essential elements, the wind farm cannot operate, yet their effects are excluded from the present evaluation. This fragmentation results in a piecemeal assessment that fails to capture the full scope of the project's impacts.

Legally, this approach conflicts with established principles confirmed by the courts in Raeshaw Farms. The ruling emphasises that a project must be assessed in its entirety rather than being divided into smaller parts whose individual effects may appear less significant. By deferring key components for separate consenting processes after the principal decision, the overall environmental and planning consequences remain inadequately examined at the critical decision-making stage.

In light of these considerations, the current method of splitting the project assessment undermines both legal requirements and sound planning practice. A comprehensive and integrated evaluation of all project elements is necessary to ensure that the full range of impacts is properly understood and addressed before any approvals are granted.

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

The applicant's submission fails to meet the requirements set out in GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the Environmental Impact Assessment Regulations concerning project splitting. Unlike a comprehensive assessment that would encompass all related works, including deferred elements, the current approach does not reliably identify or evaluate the cumulative and in-combination effects of the proposal in its entirety. This omission undermines the ability to compare and consider appropriate mitigation measures effectively across the full scope of the project.

Given this deficiency, it is essential that the decision-making process explicitly addresses the treatment of the deferred works to ensure compliance with policy and

regulatory frameworks. Without such consideration, the potential environmental impacts may be underestimated, leading to insufficient mitigation and an incomplete understanding of the proposal's overall effects. Accordingly, the application as submitted does not satisfy the necessary standards for environmental assessment and planning policy adherence.

1.1.787 Public Engagement, Site Selection and Environmental Information

The consultation process associated with the site-selection and planning application stages has demonstrably failed to meet the requisite standards for effective public participation. The applicant requests that Scottish Ministers attribute significant weight to the site-selection process; however, the deficiencies in public involvement at both the plan and site-selection phases have persisted into the application stage. Notably, the application documentation comprises many thousands of pages of technical material, presenting a substantial challenge for meaningful engagement. Moreover, the consultation period coincided with the busiest months for island communities, a time when residents are continuously occupied with the visitor season and access to specialist advice is at its lowest. This timing disparity is particularly significant given that the applicant has had years, along with substantial professional and financial resources, to prepare its case, contrasting sharply with the limited capacity of affected communities to respond effectively.

National Marine Plan policy GEN 18, alongside the principles of effective public participation enshrined in the Aarhus Convention, explicitly require that those affected by decisions of this magnitude have a realistic and fair opportunity to engage. The conditions under which the local communities were expected to participate have fallen short of this standard, undermining the legitimacy and robustness of the consultation process. It is therefore essential that Ministers give careful and critical consideration to these shortcomings when evaluating the representations submitted, recognising that inadequate public participation has materially impacted the legitimacy of the site-selection and application processes.

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

1.1.788 Effects on Local Area

The applicant's mitigation measures fail to adequately address the significant direct effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby undermining the reliability of the environmental and heritage impact assessment. Islay and Colonsay are the closest islands to the proposed development, which lies immediately north-west of Islay and west of Colonsay within a 448 square kilometre area. However, the application predominantly considers Islay only as a potential project location, neglecting a place-based assessment of how its Atlantic-facing communities would be affected in terms of setting, economy, and community life. For Colonsay and Oronsay, whose seaward outlook defines daily existence, the development array lies directly offshore. The North Colonsay and Western Cliffs Special Protection Area, located on Colonsay's coastline, is central to the applicant's derogation case and compensation plan, yet it simultaneously acknowledges that harm to the internationally protected seabird population there cannot be excluded. Furthermore, Oronsay Priory, a scheduled monument of national importance situated within this community, suffers from the same deficiencies in heritage assessment, particularly in relation to the treatment of its open maritime setting. These omissions collectively demonstrate that the applicant's evaluation underestimates the true extent of effects on these island communities and their heritage assets.

The applicant's assessment of the visual and community impacts on Iona appears to underestimate the scale and significance of these effects when compared with the Coastal Character assessment and known sensitivities of the area. While mitigation measures are proposed, the Coastal Character assessment highlights that the Sound of Iona exhibits high sensitivity, with direct orientation towards the development and extensive visibility. The turbines would extend approximately 39 degrees across the horizon at a distance of around 21 kilometres, producing an overall effect described as Moderate and Significant. This broad geographical extent of change notably includes impacts on the ferry crossing between Fionnphort and Iona, an important community and visitor route, yet the applicant's visualisations do not encompass key viewpoints such as the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, despite Historic Environment Scotland's request for additional perspectives including from the ferry itself.

Furthermore, the West Coast of Iona is similarly assessed as highly sensitive, with widespread visibility of the proposed development. The applicant accepts that significant effects would occur for residents and visitors across much of the island, including at Dùn Ì, the highest point of Iona. The heritage significance of Iona's monastic landscape, encompassing the Abbey, the Nunnery and the high crosses, is internationally recognised and intrinsically linked to pilgrimage, arrival by sea and movement through the landscape. The applicant's baseline acknowledges this, yet the omission of certain visualisations and the limited assessment of experiential impacts call into question the completeness of the heritage impact evaluation. This is particularly important given the cultural and historic prominence of these sites and their relationship to views and approaches across the island.

In addition to these considerations, community response further challenges the adequacy of the assessment. A household consultation revealed that 92 per cent of respondents on Iona object to the proposal, indicating strong local concern. Crucially, the applicant's own consultants identified habitability as a potential

pathway of effect on the island's community, yet no assessment of this impact appears to have been undertaken. The scale of the turbines can be contextualised by comparison with Ben Hynish on Tiree, a familiar landmark standing 141 metres tall and visible from Iona at approximately 33 kilometres. The largest turbines would overtop Ben Hynish by around 194 metres while being located at roughly two-thirds of that distance, emphasising their imposing presence. Taken together, these points demonstrate that the applicant's evaluation underestimates the significant visual, community and heritage effects on Iona, thereby compromising the accuracy of the environmental and social impact assessment.

The applicant's assessment acknowledges significant effects on key areas within Mull and the Ross of Mull, notably the Ross of Mull South coastal area, which is identified as having high sensitivity at distances of approximately 22 to 24 kilometres and is attributed a medium magnitude of impact. Significant effects are accepted at Erraid and along the Core Paths of the Ross, with particular recognition given to Fionnphort, the gateway to Iona and the primary embarkation point for visitors. This community, intrinsically linked to the visitor flow, is acknowledged as directly affected. Across Mull more broadly, significant effects are also accepted on Core Paths and within the Central, South, and West Mull Local Landscape Areas. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is consistently assessed as having high sensitivity over distances ranging from approximately 21 to 33 kilometres, yet is attributed only medium magnitude effects. This discrepancy suggests a limited appreciation of the full visual and experiential impact on these sensitive landscapes and communities.

The assessment's approach notably relies on distance-based reasoning that underestimates the scale of change, as exemplified by the treatment of the Wilderness and Gribun Rocks coastal area. Here, the applicant concludes that the scale of change is small due to a viewing distance exceeding 30 kilometres, a conclusion that appears to diminish the significance of industrialising the Atlantic seascape. This seascape is fundamental to Mull's west-facing tourism economy, including wildlife boat operations and the accommodation sector supporting western townships, none of which has been subject to detailed, place-based assessment. Consequently, the applicant's evaluation insufficiently addresses the profound visual, economic, and community impacts on these tourism-dependent communities and designated landscapes, thereby failing to fully recognise the significance of the development's effects on the integrity and sustainability of Mull and Ross of Mull's coastal environments.

The applicant's assessment of impacts on designated seaboard landscapes and island communities notably underestimates or omits significant effects, particularly when compared to the requirements for mitigation and consideration of natural and cultural qualities. For example, although Staffa lies approximately 35 kilometres from the development area—beyond the 30-kilometre range NatureScot recommended for assessing National Scenic Area (NSA) qualities—the applicant concludes that the scale of change there would be small and effects not significant. This conclusion stands despite the applicant's own recognition of Staffa's panoramic maritime qualities, which are integral to its status as one of Europe's most celebrated small islands. Similarly, the Jura NSA, situated around 28 to 32 kilometres away, is assigned a High sensitivity but only a Medium to Low magnitude of impact, justified

by distance and retained landforms; yet this contradicts the fundamental basis of its designation, which emphasises the wild, undeveloped character of its Atlantic outlook. The Scarba, Lunga, and the Garvellachs NSA, at 35 to 40 kilometres distance, is treated with the same limited consideration, further evidencing an underestimation of potential effects.

Moreover, the assessment fails to address the specific circumstances of vulnerable island communities such as Ulva, located within the Loch na Keal NSA. Ulva is a community-owned island at the early stages of regeneration, reliant on the very qualities of setting and unspoilt seascape that the development threatens. No assessment has been made of the potential effects on this small, re-establishing community, despite its close connection to the designated landscape and the importance of preserving its natural and cultural environment for recovery. This omission undermines the protection intended for such communities and overlooks the cumulative impact of changes on their sustainability. Taken together, these deficiencies in the applicant's assessment reveal a significant shortfall in recognising and mitigating effects on both wider designated landscapes and the island communities that depend on their intactness.

The applicant's assessment assigns a Low magnitude of change to the South Tiree coastal area despite its designation as a receptor of High sensitivity at a distance of approximately 35 kilometres. This evaluation appears inconsistent when compared to typical mitigation standards, where sensitive landscapes exposed to large-scale vertical interventions would ordinarily warrant a higher magnitude rating to reflect the visual and character impacts adequately.

Tiree's landscape is uniquely defined by its exceptionally low-lying topography and the dominance of uninterrupted sea and sky. With its highest elevation, Ben Hynish, reaching only 141 metres, the introduction of turbines rising up to 335 metres would present unprecedented vertical intrusions on the island's seascape. Given this context, categorising the magnitude of change as Low significantly underestimates the scale of visual and experiential impact on such a sensitive receptor, thereby rendering the applicant's evaluation unreliable and insufficiently robust.

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

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

Moreover, the chain of communities along the west coast of Kintyre, whose character, outlook, and visitor economy are intimately tied to the open Atlantic seaboard facing Islay, Jura, and adjacent waters, has also been overlooked. This oversight extends to the Treshnish Isles and other small islands and mainland coasts with views toward the development area, all of which share a similarly direct visual and economic relationship to the seascape. Collectively, these omissions indicate that the assessment does not fully account for the breadth of receptors potentially affected, thus compromising its overall robustness and reliability.

The applicant's environmental impact assessment systematically moderates and discounts effects on highly sensitive receptors located beyond approximately 20 kilometres. This approach results in a diminished recognition of the magnitude of change experienced by such receptors and fails to provide any place-based assessment for the communities affected at these distances. Consequently, the methodology employed undermines the integrity of the assessment by neglecting significant impacts on these distant but sensitive populations. It is therefore concluded that the applicant's distance-based approach does not adequately capture or address the full extent of environmental effects, warranting careful reconsideration.

1.1.789 Personal Observations

In addition to the planning matters above, I am personally concerned because: I am an USGBC and NCARB certified, sustainable architect with multiple completed environmentally friendly projects that were designed to use "green" or zero energy, and a few that were LEED certified. As such and as the founder of Crystal Brook Foundation, I am for sustainable forms of energy, but this project, as anticipated at this time, is definitely the worse project of this kind that I have seen in my more than 40 years of experience in the field of environmental and clean energy projects. As a professional evaluating this project from a conceptual, practical as well as environmental and aesthetic point of view, I cannot but condemn it because a project of this magnitude could not be planned on a more inappropriate location.
In addition, on a personal level, learning about this project brought devastating news to us because we were planning to visit these islands for many years and I was hoping that next year will be when our dream will come true. We wanted to spend our vacations on the shores of these incredibly beautiful and peaceful islands. I cannot imagine, and it should not be sub estimated, the irreparable damage to the general environment, local landscape and historical serenity that these enormous turbines placed around these islands will cause. The overall quality of life on and around all these unique islands will be deteriorated significantly. The suffering caused to any form of living, from humans to the smallest ones that exist now on land, in the sea and in the air will be immeasurable and unforgivable.

Based on my own local knowledge, I also wish to highlight that: It is a known fact that offshore wind energy projects have significant impacts on the surrounding communities, ecosystems and landscapes.
The list of impact is long and multifaceted:
"Wind Turbine Syndrome". Reports list symptoms such as headaches, dizziness, and sleep disturbances caused by the constant noise and vibration from wind turbines. This is a significantly important impact leading to sleep disturbances,

headaches, and other health issues on the well-being of nearby communities.
"Shadow flicker". The rotating blades of turbines cast moving shadows and a flickering effect which is disruptive to nearby residents causing annoyance and triggering health issues such as migraines or epileptic seizures.
Habitat Destruction: The construction of wind farms can lead to significant alterations in marine ecosystems and destruction of habitats for various marine species. Construction noise, particularly pile-driving activities, is harmful to human and marine mammals. The electromagnetic fields generated by undersea cables affect certain marine species, their behavior and navigation.
Persistent Noise. During operation wind turbines generate both audible noise and low-frequency infrasound, which can disturb marine life, particularly species that rely on sound for navigation and communication.
Impact on Wildlife: Increase of bird fatalities caused by collisions with turbine blades, as well as the disruption of migration patterns have been reported. Increased energy expenditure during migration affects breeding success of avian and aquatic population.
Visual Pollution: The large size of wind turbine farms dramatically changes coastal landscapes for miles and miles. These imposing structures dominate skylines and are like large graffiti on the natural beauty of the area and will affect tourism by destroying the many scenic locations of these very special islands.
This Project is Not Carbon-neutral. Manufacturing, transportation, installation and maintenance involve great energy consumption and significant carbon emissions in the production and transportation of steel, concrete, and composite materials for wind turbines as well as for their continuous maintenance.
Reliability and Inefficiency Issues as Argued by Many Critics: Wind power leads to inconsistent energy production due to unreliable dependence on weather conditions. In addition, the costs associated with building and maintaining wind farms cannot be justified when compared to other energy sources.

Finally, I would also ask the Scottish Ministers to consider: The Scottish Ministers should also consider the following:
Property Value Depreciation. The presence of wind farms has impacted negatively property values in surrounding areas. These communities have experienced a decrease in market value due to the health concerns, noise disturbances and visual impact associated with proximity to these installations.
Economic Impact of Diminished Tourism. Wind farms fundamentally alter the character of landscapes of coastal areas. This transformation will lead to a loss of cultural and historical significance affecting community identity, impacting tourism and the economic vitality of the islands.

1.1.790 Further Comments

The large wind turbine imposing structures dominate and destroy skylines forever because these large graffiti on the sky are never taken down even after they stop working, a legacy unbearable for those who with their aggressive intervention dare to damage in few years the beauty of these very special islands shaped over thousands of years by harmoniously balanced forces of nature.

I do hope that you will stop any development of this kind on or around these pristine islands.

1.1.791 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy requirements governing its determination. The applicant's own assessment acknowledges significant impacts upon nationally designated landscapes, as well as on the coastal communities and their heritage. However, a detailed review of the applicant's submitted documents reveals that these impacts have been understated. Crucially, the necessary heritage assessment has not been conducted. Moreover, although the effects on the island communities involved were identified, these impacts have never undergone proper evaluation. The ecological assessments, which are essential to meet statutory tests, have not been demonstrated to be capable of compliance. It is also important to note that only a portion of the overall project is currently before the Scottish Ministers for consideration.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to decline the related marine licence application.

Should the Ministers decide against refusal, I request that they require the submission of additional environmental information and enhanced visualisations. Furthermore, I recommend that the applications be determined only following a public inquiry, which would allow the substantive issues raised in this objection to be thoroughly examined. Regardless of the outcome, I ask that the Ministers explicitly address and state their conclusions on the effects of the proposal on cultural heritage and the island communities within their decision rationale.

Yours faithfully,

[Redacted]

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

Member of the public 584
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, referenced by applications 00012385 for consent under section 36 of the Electricity Act 1989 and 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. These applications are made by MachairWind Limited, trading as ScottishPower Renewables. I request that this letter be recorded as a formal objection, that I be registered accordingly, and that I am kept informed of the decision regarding these applications.

The development in question seeks approval for an offshore wind farm with an installed capacity of approximately 2 gigawatts. The project would consist of between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip. The proposed site lies within a Windfarm Development Area covering about 448 square kilometres of marine space, located north-west of Islay and west of Colonsay. It is situated roughly 21 kilometres from Iona and is in close proximity to the islands and coastal communities of the southern Hebrides.

The following discussion outlines the planning and environmental grounds underpinning my objection, framed within the relevant statutory and policy context governing the determination of these applications. It is important to emphasise that the onus lies squarely on the applicant to provide sufficient evidence demonstrating compliance with the applicable regulatory and policy tests. Objectors are not required to disprove the application; rather, the applicant must satisfy the decision-maker that all criteria are met. In this case, the evidence supplied by the applicant falls short of that requirement, and therefore, consent ought to be refused.

1.1.792 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989, which explicitly requires the applicant to have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, as well as protecting sites, buildings, and objects of architectural, historic, or archaeological interest. The evidence before the determining authority does not establish that the applicant has adequately addressed these requirements or taken reasonable steps to mitigate adverse effects on these protected interests. This omission is critical given the statutory mandate imposed both on the applicant and the Scottish Ministers in the determination process.

Furthermore, the absence of demonstrated compliance and the presence of deficiencies and omissions in the application constitute a direct conflict with the applicable legal and policy framework. As established in the evidence, such failures weigh decisively against the granting of consent. The application’s shortcomings in meeting these statutory duties undermine the legal basis for approval and must be regarded as a fundamental reason for refusal.

The marine licence application fails to demonstrate compliance with the statutory requirements of Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland’s National Marine Plan. Authorisation decisions under this legislation must

accord with the National Marine Plan unless other relevant considerations apply. However, the application does not adequately address key General Policies including GEN 4 on Co-existence, GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 and paragraph 4.85 on Cumulative Impacts. The absence of demonstrated compliance with these policies constitutes a material deficiency in the application. As established by the statutory assessment framework, such deficiencies, omissions, and conflicts with the applicable legal and policy framework must weigh against the granting of consent. Therefore, the marine licence application should be refused on the grounds that it does not meet the mandatory requirements set out in the Marine (Scotland) Act 2010 and the National Marine Plan.

The proposal fails to comply with key policies of National Planning Framework 4, specifically Policies 3, 4, 7, and 11, which address biodiversity, natural places, historic assets, and energy. As a significant material consideration, the Framework must be applied alongside statutory duties and legislative requirements. The absence of demonstrated compliance with these policies directly undermines the proposal's conformity with the established legal and policy framework.

The evidence clearly identifies deficiencies and omissions in the application of these policies. There is no satisfactory demonstration that the proposal adequately protects or enhances biodiversity as required by Policy 3, nor that it safeguards natural places in accordance with Policy 4. Furthermore, the proposal fails to meet the standards set out in Policy 7 concerning the conservation of historic assets and places. The lack of compliance with Policy 11 on energy further compounds these shortcomings, indicating a failure to align with the Framework's comprehensive requirements.

Given these unresolved conflicts and the absence of evidence demonstrating adherence to the relevant policies, the proposal is fundamentally at odds with the National Planning Framework 4. Such deficiencies weigh decisively against the granting of consent, as the proposal does not meet the necessary legal and policy standards mandated by the Framework. Consent should therefore be refused on these grounds.

The applicant has failed to provide an adequate Environmental Impact Assessment (EIA) as required under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations. These regulations mandate that the likely significant environmental effects of the proposal must be identified, assessed, and reported prior to any determination. The submitted documentation does not meet this statutory requirement, as it lacks a comprehensive and robust assessment of the environmental impacts, thereby undermining the decision-making process. Without a full and proper EIA, the planning authority cannot be satisfied that all significant environmental effects have been properly considered.

Furthermore, the proposal does not comply with the Habitats Regulations, which require that the effects on European protected sites be assessed in accordance with

the applicable statutory tests. The evidence before the authority demonstrates that the necessary Habitats Regulations Assessment (HRA) has not been adequately undertaken. This omission is critical, as it prevents the authority from fulfilling its legal duty to ensure that the proposal will not adversely affect the integrity of protected habitats. The absence of a satisfactory HRA constitutes a fundamental procedural failure and conflicts directly with the statutory framework governing protected sites.

Given these clear deficiencies and omissions in both the Environmental Impact Assessment and the Habitats Regulations Assessment, the proposal is in conflict with the applicable legal and policy framework. Where compliance has not been demonstrated, these matters weigh heavily against the granting of consent. The failure to provide the required assessments undermines the statutory process and the authority's ability to make an informed and lawful decision. Consequently, the proposal should be refused on the grounds of inadequate environmental and habitats impact assessment.

The applicant's submission does not demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be considered and given due weight in the decision-making process. The evidence provided fails to show that these statutory obligations have been properly addressed or integrated into the assessment of the proposal.

Furthermore, the documentation reveals deficiencies and omissions in the consideration of island community interests, falling short of the legal and policy framework established by the Islands (Scotland) Act 2018. This lack of thorough evaluation undermines the statutory purpose of the Act and represents a procedural failing in the planning process.

Given these shortcomings, and in accordance with the principle that where compliance has not been demonstrated or where conflicts with the applicable legal framework exist, such matters weigh against the granting of consent, the proposal should be refused on the basis that it does not meet the statutory requirements relating to island communities.

There remains significant uncertainty as to whether the applicant has fulfilled the fundamental evidential burden required to demonstrate compliance with all relevant legal and policy requirements. The applicant is explicitly responsible for providing robust, objective, and proportionate evidence that every applicable statutory duty, planning policy, and environmental assessment obligation has been met. In this case, the evidence submitted fails to conclusively establish that these essential criteria have been satisfied.

Moreover, where compliance has not been demonstrated, or where the evidence reveals deficiencies, omissions, or conflicts with the governing legal and policy framework, such shortcomings must weigh decisively against the granting of consent. Given the absence of clear and comprehensive proof of adherence to all statutory and policy obligations, the proposal cannot be considered compliant. Consequently, the application should be refused on the basis that the applicant has not met the requisite evidential standards to justify approval.

1.1.793 Conflict with National Planning Framework 4 and the Development Plan

NPF4 Policy 11 explicitly supports renewable energy development; however, this support is contingent upon compliance with the policy's impact criteria, including sections 11(c), 11(d), and 11(e), which address effects on communities, landscapes, seascapes, and other receptors. The proposal fails to meet these criteria. It would result in significant adverse impacts on nationally designated landscapes and seascapes, undermining their integrity. Furthermore, the evidence does not demonstrate adequate protection for the cultural significance of scheduled monuments and their settings. The safeguarding of island communities has likewise not been assured, and the ecological requirements outlined by the policy have not been satisfactorily evidenced as capable of being met. Consequently, the proposal conflicts with the impact criteria set out in NPF4 Policy 11 and cannot be supported on this basis.

The proposal fails to comply with multiple National Planning Framework 4 (NPF4) policies designed to protect nationally important landscapes, heritage assets, and biodiversity. Policy 11 is to be read alongside Policy 4(c) and 4(d), which safeguard National Scenic Areas and other nationally important landscapes from significant adverse effects on the qualities for which they are designated. Additionally, Policy 7, including section 7(h) on scheduled monuments and 7(c) and 7(d) concerning the setting of historic assets, alongside Policy 3 on biodiversity, establishes a comprehensive framework for the protection of these critical assets.

An analysis of the proposal against these policies reveals clear conflicts. The development would cause significant adverse effects on nationally designated landscapes and seascapes, undermining the reasons for their designation. Furthermore, the submission has not demonstrated that the cultural significance of scheduled monuments and their settings would be preserved. It also fails to show adequate safeguards for island communities. Lastly, the ecological tests required by Policy 3 have not been evidenced as capable of being met. Taken together, these deficiencies indicate that the proposal is inconsistent with key NPF4 policies protecting designated assets and therefore cannot be supported.

The proposal would result in significant adverse effects on the landscape, heritage, and community interests safeguarded by the terrestrial development plan framework, including the Argyll and Bute Local Development Plan 2. These impacts directly conflict with the policies designed to protect these values. Consequently, the proposal is fundamentally inconsistent with the development plan as a whole, as well as with the overarching objectives of National Planning Framework 4. The applicant has failed to demonstrate that these conflicts can be resolved or justified. Therefore, the proposal should be refused on the grounds of inconsistency with the relevant terrestrial development plan policies.

1.1.794 Seascape, Landscape and Visual Effects

The applicant's assessment methodology lacks a clear distance threshold for ceasing major effects, yet evidence indicates that no highly sensitive receptor beyond approximately 20 kilometres is attributed the highest magnitude of change, regardless of sensitivity or visibility. Their own documents acknowledge distance as

a key factor: areas over 30 kilometres away are judged to experience only small-scale change, with high magnitude effects confined to within about 20 kilometres, medium effects between 20 and 30 kilometres, and low effects beyond 30 kilometres for certain landscape types. This systematic moderation of magnitude at distances where the most sensitive designated landscapes are located results in understated inputs to the protective tests. Consequently, the conclusions drawn do not reliably represent the true effects that the Scottish Ministers are being asked to consider.

The applicant's visual evidence is prepared in accordance with NatureScot's visualisation guidance, which explicitly recognises inherent limitations in printed visualisations. This guidance highlights that such visual materials cannot fully replicate the scale perceived by a viewer on site. Consequently, while the visualisations provide a useful reference, they do not capture the full experiential context or the dynamic qualities of the landscape as seen in person.

Furthermore, the wireline drawings included within the panoramic projections are subject to the same constraints as the accompanying photography. These wirelines serve as a technical rendering within the visualisation package rather than functioning as an independent corrective tool. Their role is therefore limited to augmenting the photographic evidence, without overcoming the fundamental perceptual constraints identified. Taken together, these factors demonstrate the importance of careful interpretation of the visual evidence and caution against overreliance on such materials in isolation.

While mitigation measures may reduce some visual impacts during daylight hours, they cannot address the fundamental change introduced by aviation and navigation lighting at night. The development would introduce such lighting to a sea horizon that is currently unlit, resulting in a permanent alteration of the night-time seascape character throughout its stated 35-year operational life. This lighting effect is inherently intrusive and unmitigable, as it is both continuous and unavoidable given safety requirements.

Furthermore, the temporal limitation of the operational life does not diminish the significance of the harm in planning policy terms. Granting consent for this development would effectively designate the seascape as appropriate for wind farm use, thereby setting a precedent that prioritises industrial activity over the existing character and tranquillity of the night-time maritime environment. This policy implication underscores the need for careful consideration of whether such a permanent alteration to the seascape is justified.

The applicant's submission fails to adequately demonstrate that proposed mitigation measures effectively address the identified effects on landscape and seascape interests. While certain impacts are acknowledged, the application does not provide sufficient evidence that these effects have been mitigated to a degree that would satisfy the requirements set out in the relevant policies. In particular, the assessment lacks clarity on how the scale of these effects aligns with the methodology employed, undermining confidence in the conclusions presented.

These shortcomings result in non-compliance with key planning policies designed to safeguard nationally important landscapes and seascapes. Specifically, the proposal

does not meet the requirements of NPF4 Policies 4(c) and 4(d), Policies 11(d) and 11(e), GEN 7, nor paragraph 4.28 of the National Marine Plan, as identified in the submitted evidence. Without clear demonstration of consistency and adherence to these policies, the proposal cannot be considered acceptable in its current form.

1.1.795 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of heritage impacts fails to comply with the required methodology, thereby undermining the reliability of its conclusions regarding the integrity of setting. Although the applicant adopts Historic Environment Scotland's recognised methodology for assessing effects on the setting of historic assets—a methodology developed and refined through consultation with Historic Environment Scotland—this approach mandates an evaluation of whether changes to setting affect the contribution setting makes to the cultural significance of heritage assets. Crucially, it requires consideration of whether the integrity of setting is adequately retained, emphasising that visual change alone should not be equated directly with adverse impact.

However, a published Methodological Audit, prepared entirely from the applicant's Appendix 14.3 and submitted in support of community objections, identifies significant shortcomings in the operational assessment. While the assessment identifies relevant heritage attributes and describes visual change in terms of visibility, distance, monument prominence, retained views, screening, and skyline occupation, it stops short of demonstrating how the integrity of setting has been evaluated in accordance with the applicant's own accepted methodology. The necessary evaluative step—assessing the effect of these visual changes on the cultural significance and integrity of setting—is absent in all of the examined examples.

In consequence, the assessment's conclusion that the integrity of setting is adequately retained lacks evidential foundation and cannot be relied upon. This methodological failure casts serious doubt on the credibility of the heritage impact conclusions presented by the applicant.

The applicant's own baseline assessment acknowledges that the cultural significance of the affected heritage assets is deeply rooted in a range of experiential and landscape qualities. These include aspects such as pilgrimage, arrival by sea, and movement through a living cultural landscape, as well as the interrelationships between monuments, spirituality, and their surrounding landscape and seascape. Importantly, these qualities are experienced dynamically through movement rather than from fixed viewpoints. Despite this recognition, Historic Environment Scotland's consultation responses, as recorded within the application, have highlighted the need for additional viewpoints to ensure these broader experiential and cultural qualities are adequately represented. This suggests that the current assessment may not fully capture the holistic nature of the cultural landscape and its intangible attributes. Therefore, it is essential that the assessment methodology be expanded to incorporate these wider perspectives, to provide a more comprehensive understanding of heritage impacts in line with the applicant's own baseline findings and statutory consultees' advice.

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

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

The application engages National Planning Framework 4 (NPF4) Policy 7(h) concerning scheduled monuments, as well as Policies 7(c) and 7(d) relating to the setting of heritage assets, together with GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. These provisions collectively establish a rigorous framework intended to ensure that the cultural significance of heritage assets, particularly those of international and national importance, and their settings are duly protected in the planning process.

However, the applicant has failed to demonstrate that such protection will be secured. There is a conspicuous absence of a comprehensive assessment to confirm that the cultural significance of these heritage assets and their settings will not be compromised. Consequently, the Scottish Ministers do not have before them the necessary evidence to conclude that the application complies with the relevant heritage protection policies. This deficiency undermines the acceptability of the proposal in terms of its compliance with policy requirements for safeguarding heritage assets.

1.1.796 Effects on Island Communities, Tourism and the Local Economy

The proposed development poses a significant threat to the fundamental economic and social sustainability of the island communities affected. These communities rely exceptionally heavily on visitors, who are attracted by the very qualities identified in the applicant’s own baselines: landscape, seascape, cultural heritage, tranquillity and remoteness. Any alteration to these attributes would directly undermine the economic foundation of these communities.

Such an impact would extend beyond immediate economic concerns, jeopardising the provision of local services, the retention of populations and ultimately the long-term viability of these island communities. The proposal therefore risks destabilising the delicate balance upon which these communities depend and should be carefully reconsidered in light of these vulnerabilities.

In considering the adequacy of the applicant’s socio-economic assessment of impacts on island communities, it is instructive to compare the thoroughness of the analysis applied to port communities with that directed towards the islands themselves. The assessment in Chapter 18 offers a detailed examination of potential effects on port communities, reflecting a place-based approach that acknowledges

their particular circumstances. However, this level of scrutiny is not extended to the island communities directly facing the development, where the assessment remains at a broad regional scale. This inconsistency raises concerns about the reliability of the conclusions drawn, particularly regarding the sensitivity of island communities to tourism-related changes.

The applicant's own consultants highlight habitability as a potentially significant pathway through which the proposal could affect island communities. Despite this recognition, no specific assessment of the habitability of the islands was conducted. Instead, the socio-economic evaluation concludes that the island communities exhibit low sensitivity to tourism effects, a determination reached without any place-based analysis. Such an approach overlooks the distinctive characteristics of small island economies, which are markedly different from regional averages. These economies are heavily reliant on sectors that are directly influenced by the qualities attracting visitors. Consequently, increasing visitor numbers do not mitigate sensitivity; rather, they amplify the communities' dependence on attributes that may be vulnerable to change.

Given these considerations, the conclusion of low sensitivity for island communities appears unfounded and is better characterised as an assumption rather than evidence-based. The absence of a tailored, place-specific socio-economic assessment undermines confidence in the applicant's methodology and its capacity to understand or mitigate impacts on island communities adequately. It would be prudent for the assessment to incorporate detailed, island-focused analysis to ensure that the particular vulnerabilities and dependencies of these communities are fully recognised and addressed in the planning process.

There remains significant uncertainty as to whether the proposal complies with the necessary policy and statutory requirements concerning island communities. The proposal engages GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions be based on robust socio-economic evidence and that a precautionary approach be adopted where such evidence is lacking. Additionally, NPF4 Policy 11(c) alongside the Islands (Scotland) Act 2018 require that the interests of island communities are thoroughly assessed and given appropriate weight through meaningful engagement throughout the planning process. However, the applicant has acknowledged the need for particular scrutiny of island communities but has failed to carry out the required assessment to understand the proposal's effects on them. Consequently, it has not been demonstrated that the proposal aligns with the principles of sustainable island communities, nor that the statutory duties owed to these communities have been fulfilled. Given these shortcomings, the proposal does not meet the requisite standards for protecting island communities and should therefore be refused.

1.1.797 Ecology, Biodiversity and Habitats Regulations

The proposed development site and its adjacent waters encompass Priority Marine Features and Annex I habitats, which are ecologically significant. Additionally, the surrounding marine environment supports populations of seabirds, marine mammals, and basking sharks. Introducing large-scale construction, operational activities, and

eventual decommissioning over several decades poses a substantial risk of significant adverse environmental impacts to these sensitive ecological resources.

In considering the applicant's approach to addressing potential adverse effects on protected sites, it is notable that they have submitted both a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan. These documents specifically target the guillemot population within the North Colonsay and Western Cliffs Special Protection Area, reflecting a recognition that the proposed development may pose risks to this designated habitat. Such submissions are conventionally prepared in circumstances where it cannot be definitively ruled out that the integrity of a protected site may be compromised, indicating a precautionary stance on the part of the applicant.

The presence of these documents within the application package serves as a significant feature, underscoring the applicant's awareness of the complexities involved in securing consent where protected species and sites are concerned. Importantly, these plans are framed as "Without Prejudice," suggesting that the applicant does not concede an adverse effect but acknowledges the possibility that the Scottish Ministers might assess the situation differently. This cautious approach allows for the consideration of derogation provisions under relevant conservation legislation, which permit certain actions that might otherwise be prohibited, provided that appropriate compensation measures are implemented to offset any harm.

While the submission of derogation and compensation plans demonstrates a proactive attempt to mitigate potential impacts, it also raises questions about the certainty of the applicant's conclusions regarding adverse effects. The reliance on such documents reflects an understanding that the planning authority may not concur with the applicant's assessment of no significant harm. Consequently, these submissions should be carefully scrutinised to ensure that any proposed compensation is adequate, enforceable, and capable of maintaining the overall integrity of the protected area. It remains essential that the planning decision fully weighs these considerations in determining whether the application can be granted without undermining the conservation objectives of the site.

Mitigation, compensation proposals, and future monitoring measures, while important components of development planning, do not alone satisfy the stringent statutory tests required under the Habitats Regulations. The competent authority must be assured beyond reasonable scientific doubt that the proposal will not adversely affect the integrity of the protected site before consent can be lawfully granted. This high evidential threshold places the onus squarely on the applicant to demonstrate compliance, rather than relying solely on proposed mitigation or compensation strategies.

This legal framework is reinforced by relevant policy provisions, including GEN 9 and GEN 13 of the National Marine Plan, alongside Policies 3, 4(b), 4(e), and 4(f) of NPF4. Together, these establish a comprehensive and rigorous approach to safeguarding protected habitats and species, ensuring that any development proposals undergo robust assessment consistent with the Habitats Regulations. Consequently, planning consent must be withheld unless these exacting requirements are fully met.

The evidence submitted by the applicant, including their own derogation documents, reveals a significant shortfall in demonstrating compliance with the statutory tests designed to protect internationally important habitats and species. These documents themselves reflect a level of uncertainty that undermines confidence in the applicant's assertions. The statutory framework requires clear and convincing evidence that the requisite conditions for derogation are met, and the applicant's materials fail to provide such assurance. Without this, the legal safeguards intended to prevent harm to critical ecological features remain inadequately addressed.

This failure to satisfy the statutory tests has substantial implications for the assessment of the planning application. The protections afforded to internationally important ecological assets are not mere formalities but essential components of environmental stewardship and legal compliance. As the applicant has not demonstrated that these tests can be met, the basis for granting consent is fundamentally compromised. Consequently, the application should not be approved in its current form, as doing so would contravene the statutory protections and potentially cause irreparable harm to the designated habitats and species.

1.1.798 Cumulative and In-Combination Effects

The current assessment approach is fundamentally flawed as it considers only part of the project before the Scottish Ministers, deferring critical components such as the export cable corridor and onshore transmission works to later applications. These deferred elements are essential for the wind farm's operation, yet their effects are never evaluated collectively with the principal development. This fragmented process prevents a comprehensive assessment of the project's cumulative impacts and contravenes the established legal principle, affirmed by the courts in Raeshaw Farms, that a project must be assessed in its entirety rather than divided into smaller parts whose individual effects appear diminished. Such an incomplete evaluation undermines proper decision-making and fails to meet procedural and legal standards.

The practical consequence of relying on flawed baseline assessments is that the cumulative impact assessment fails to provide a reliable account of the true combined effects of the proposed development alongside other existing, consented, and foreseeable projects. This undermines the ability of decision-makers to fully understand the scale and significance of the overall impact on the environment and local communities.

This unreliability stems from the cumulative assessments depending directly on conclusions drawn in the Environmental Impact Assessment (EIA), particularly those relating to landscape, heritage, and socio-economic factors. When these underlying assessments understate effects, as demonstrated elsewhere, the cumulative assessment necessarily begins from a diminished baseline. Consequently, the aggregated effects presented do not reflect the actual extent of harm or change that would result from the cumulative development scenario.

It follows that the cumulative impact assessment cannot be regarded as a sound basis for planning decisions. Without an accurate baseline, the combined effects of this proposal and other developments are consistently underestimated, risking

inadequate mitigation and management measures. A thorough reassessment is essential to ensure that the cumulative impacts are fully and fairly evaluated in line with statutory requirements.

There remains considerable uncertainty regarding the applicant's compliance with established planning policies and environmental regulations, specifically concerning the issue of project splitting. The requirements set out in GEN 21 and paragraph 4.85 of the National Marine Plan, alongside NPF4 Policy 11(e) and the Environmental Impact Assessment Regulations, necessitate a comprehensive and reliable identification and assessment of cumulative and in-combination effects arising from the proposal. In this instance, the applicant has not sufficiently demonstrated that these effects, nor the impacts of the project in its entirety, have been adequately considered.

Furthermore, the treatment of deferred works has not been explicitly addressed within the application or its supporting documentation. It is essential that the decision-making process explicitly considers these elements to ensure full compliance with policy and regulatory frameworks. Without such clarification and assurance, it is not possible to conclude that the proposal meets the necessary standards for environmental assessment and planning approval. Therefore, I respectfully request that the decision-making authority requires an express and thorough evaluation of the deferred works as part of the determination.

1.1.799 Public Engagement, Site Selection and Environmental Information

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

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

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

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

Moreover, the application frequently relies on future assessments, post-consent plans, monitoring programmes, and additional approvals to address outstanding issues. This approach conflicts with the requirements of the EIA Regulations, which mandate that likely significant effects must be fully understood prior to determination. The Scottish Ministers are required to make decisions based on the evidence before them at the time of determination, rather than on the assumption that unresolved matters will be satisfactorily addressed at a later stage. In this regard, the applicant has not demonstrated that the environmental information submitted is adequate to enable an informed decision.

1.1.800 Effects on Local Area

The applicant's assessment falls short in adequately addressing the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, undermining the reliability of the environmental and heritage impact evaluation. While mitigation and compensation measures are proposed for internationally protected seabird populations along Colonsay's North Colonsay and Western Cliffs Special Protection Area, these acknowledge that harm cannot be excluded but do not extend to a full place-based evaluation of the wider community impacts. Islay, situated immediately south-east of the 448 square kilometre development area, is principally considered only as a potential project location rather than as a community whose Atlantic-facing settlements confront the nearest edge of the array. This oversight results in no substantive assessment of effects on Islay's setting, economy, or community life. Similarly, Colonsay and Oronsay's seaward outlooks, integral to daily life and cultural identity, face the array directly, yet the application fails to adequately assess the implications for these communities. Of particular concern is Oronsay Priory, a scheduled monument of national importance located within this area, whose open maritime setting is insufficiently addressed given the acknowledged gaps in the heritage assessment. Collectively, these deficiencies demonstrate that the applicant's evaluation does not reliably capture the full extent of impacts on these island communities, calling into question the sufficiency of the proposed mitigation and compensation measures.

The applicant's assessment significantly underestimates the scale and importance of the visual and community impacts on Iona, leading to an incomplete evaluation of environmental and social effects. The Coastal Character assessment identifies the Sound of Iona as highly sensitive, with extensive visibility and a moderate but significant overall effect extending approximately 21 kilometres, where turbines span around 39 degrees of the horizon. Similarly, the West Coast of Iona, including its highest point at Dùn Ì, is acknowledged as highly sensitive with widespread visibility,

and the applicant accepts significant effects for residents and visitors. Despite this, the assessment fails to fully address the community's concerns and the implications for habitability, a pathway of impact recognised by the applicant's own consultants but never properly examined.

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

The practical implications of the visual scale are stark when compared to familiar landmarks. Ben Hynish on Tiree, standing at 141 metres and visible from Iona at about 33 kilometres, would be dwarfed by the proposed turbines, which would exceed it in height by approximately 194 metres at roughly two-thirds of the distance. This comparison underscores the overwhelming presence the turbines would have on the island's landscape and the lived experience of its community. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal, highlighting the depth of local opposition and reinforcing that the assessment's conclusions do not reflect the community's perspective or the development's true impact.

The applicant's assessment acknowledges significant effects on the Ross of Mull South coastal area, attributing a High sensitivity at distances of approximately 22 to 24 kilometres and a Medium magnitude of impact. Notably, significant effects are accepted at Erraid and along the Core Paths of the Ross, with particular recognition that Fionnphort—the gateway to Iona and the embarkation point for visitors—is the community most directly affected by changes to visitor flows. Across Mull, the applicant similarly accepts significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is assessed as having High sensitivity throughout at distances ranging from approximately 21 to 33 kilometres, yet it is attributed no more than Medium magnitude of impact.

This assessment, however, demonstrates an overreliance on distance-based reasoning that inadequately captures the significance of effects on key coastal areas. For example, the applicant's treatment of the Wilderness and Gribun Rocks coastal area, where the scale of change is judged small due to a viewing distance exceeding 30 kilometres, exemplifies this limited approach. Such a methodology fails to account for the qualitative importance of these landscapes to local communities and tourism.

Crucially, Mull's west-facing tourism economy, which includes wildlife boat operations and the accommodation sector of its western townships, is fundamentally dependent on the Atlantic seascape that the proposed development would industrialise. Despite this, no place-based assessment has been provided for these

communities. Consequently, the applicant's evaluation underestimates the significant visual, economic, and community impacts on Mull and Ross of Mull's coastal landscapes and the tourism-dependent populations that rely upon them.

The applicant's assessment recognises that Ulva, situated within the Loch na Keal National Scenic Area, shares fully in the effects experienced by that designated landscape. Ulva is a community-owned island undergoing regeneration, characterised by a small, re-establishing population whose recovery is closely tied to the unspoilt seascape and setting at risk. However, no specific assessment has been undertaken regarding the impacts on this vulnerable island community. Similarly, Staffa, located within the same National Scenic Area and renowned as one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development area—beyond the 30-kilometre distance NatureScot recommended for the assessment of effects on National Scenic Area qualities. The applicant concludes that the scale of change at Staffa would be small and the effect not significant, despite acknowledging the panoramic maritime qualities inherent to the area. The Jura National Scenic Area, assessed as having high sensitivity at a distance of approximately 28 to 32 kilometres, is attributed only a medium to low magnitude of impact. This moderation is justified by distance, apparent scale, and the retention of landforms, notwithstanding that the designation fundamentally relies on the wild, undeveloped character of its Atlantic outlook. The Scarba, Lunga, and Garvellachs National Scenic Area, situated roughly 35 to 40 kilometres away, receives comparable treatment in the assessment. Taken together, these considerations suggest that the applicant's evaluation underestimates or omits significant effects on these important designated landscapes and the vulnerable island communities dependent upon them, thereby undermining the protection of their natural and cultural qualities.

The applicant's assessment recognises the South Tiree coastal area as having High sensitivity at a distance of approximately 35 kilometres, yet attributes only a Low magnitude of change to the effects of the proposed development. This evaluation appears inconsistent given the acknowledged sensitivity of the receptor and its considerable distance from the site.

Tiree's landscape is uniquely characterised by its exceptionally low-lying topography, with its highest point, Ben Hynish, reaching merely 141 metres. The island's defining features are the expansive sea and sky, presenting an open oceanic horizon. The introduction of turbines up to 335 metres in height would create vertical elements unprecedented in Tiree's seascape. Consequently, the applicant's conclusion of a Low magnitude of change in such an exposed and sensitive environment significantly understates the true extent of the impact, rendering the overall evaluation unreliable.

The applicant's assessment fails to consider significant effects on mainland and island communities that have direct visual and economic connections to the seascape in question. Notably, Gigha, a community-owned island emblematic of island regeneration, faces the development from the east, yet the potential impacts on its delicate community balance and economy remain unexplored. Similarly, Ardnamurchan Point—the most westerly tip of the British mainland—offers panoramic views along the Hebridean seaboard, attracting visitors whose experience

depends on the unspoiled seaward panoramas. These receptors, critical to the local visitor economy, appear to be dismissed through a distance-based moderation approach. Furthermore, the west coast of Kintyre encompasses a series of communities whose identity and tourism are closely tied to the open Atlantic seaboard views towards Islay, Jura, and adjacent waters. The Treshnish Isles and other small islands and mainland coasts with sightlines to the development area share this vulnerability. The omission of these communities from thorough assessment undermines the comprehensiveness and reliability of the applicant's environmental evaluation.

The applicant's distance-based methodology systematically moderates and discounts environmental effects on sensitive receptors located beyond approximately 20 kilometres, resulting in an underestimation of impacts that compromises the environmental impact assessment's integrity. Specifically, the assessment reduces the magnitude of change attributed to highly sensitive receptors at these distances, effectively diminishing the perceived severity of effects. This approach overlooks the lived experiences of communities situated beyond the 20-kilometre threshold, as no place-based assessment has been conducted to capture the specific local impacts they endure. Consequently, the current evaluation fails to provide a comprehensive understanding of the environmental consequences, thereby undermining the robustness and credibility of the overall assessment.

1.1.801 Summary

The proposal submitted by the applicant fails to satisfy the statutory and policy requirements governing its determination. Notably, the applicant's own assessments acknowledge substantial impacts on nationally designated landscapes as well as on the cultural heritage and communities along the coast. However, an analysis of the applicant's published documents reveals that these impacts have been consistently underestimated. Crucially, the necessary heritage assessment has not been conducted, and although effects on the island communities potentially affected were identified, no evaluation of these impacts has been undertaken. Furthermore, the ecological criteria set out for the project have not been demonstrated to be achievable. It is also important to note that only a portion of the overall development is currently before the Scottish Ministers for consideration.

In light of these deficiencies, it is respectfully urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm proposal, as well as decline the associated marine licence. Should the Ministers determine not to refuse, it is requested that the applicant provide additional environmental information accompanied by enhanced visualisations. Moreover, the applications should only be determined following a public inquiry, thereby enabling a thorough examination of the concerns raised in this objection. Regardless of the final decision, it is further requested that the Ministers explicitly address and conclude on the implications for cultural heritage and the island communities affected within their stated reasons.

Yours faithfully,

[Redacted]

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

Member of the public 585
Dear Sir/Madam,

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

This objection is grounded in both planning and environmental considerations, evaluated against the relevant statutory provisions and policy guidance that govern the determination of such applications. It is important to emphasise that the onus lies with the applicant to provide compelling and adequate evidence demonstrating compliance with all applicable legal and policy tests. Objectors, conversely, bear no obligation to prove contrary positions. Upon careful review, it is apparent that the applicant has failed to meet this evidential burden. Consequently, it is my clear position that the applications should not be granted consent.

I request that this correspondence be formally recorded as an objection, that my status as an objector be duly noted, and that I receive notification of the final decision regarding these applications.

1.1.802 Legislative and Policy Framework

The application before the Scottish Ministers raises significant uncertainty regarding compliance with the statutory duties imposed by Schedule 9 of the Electricity Act 1989. This Schedule explicitly requires the applicant to have regard to the desirability of preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, as well as protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant must take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The Scottish Ministers, in determining this application, are similarly bound to have regard to these statutory duties.

In the evidence presented, there is a clear absence of demonstrated compliance with these requirements. The application fails to adequately address how it has had regard to preserving natural beauty or conserving the specified ecological and geological features. There is no substantive evidence that reasonable steps have been taken to mitigate adverse effects on these protected interests. This omission represents a fundamental deficiency in the application’s assessment and undermines confidence that the statutory duties have been properly considered.

Given that the statutory framework is explicit and non-negotiable, the failure to demonstrate compliance or to provide sufficient evidence of mitigation measures

constitutes a direct conflict with the legal and policy framework governing such proposals. As established, where compliance has not been demonstrated, or where deficiencies and omissions are evident, these matters weigh decisively against the granting of consent.

In conclusion, the application does not meet the statutory requirements under Schedule 9 of the Electricity Act 1989. The lack of adequate regard to preserving natural beauty and protecting ecological and heritage interests, coupled with the absence of reasonable mitigation steps, renders the proposal deficient and incompatible with the statutory duties that the Scottish Ministers must uphold. Consent should therefore be withheld on this basis.

The marine licence application under consideration is subject to determination pursuant to Part 4 of the Marine (Scotland) Act 2010, which mandates that authorisation decisions must be made in accordance with Scotland's National Marine Plan unless relevant considerations indicate otherwise. The applicant's submission is required to demonstrate compliance with a suite of General Policies integral to the statutory assessment process. These include GEN 4 concerning Co-existence, GEN 6 alongside paragraphs 4.22 to 4.23 addressing the Historic Environment, GEN 7 with paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 with paragraph 4.81 on Sound Evidence, and GEN 21 with paragraph 4.85 on Cumulative Impacts. The application as presented fails to provide adequate evidence of conformity with these policies, which collectively form the legal and policy framework governing marine licencing decisions in Scotland.

In particular, the application does not satisfactorily demonstrate compliance with the requirements for sound evidence as stipulated in GEN 19 and paragraph 4.81, nor does it adequately address cumulative impacts as required by GEN 21 and paragraph 4.85. The absence of robust evidence and the presence of deficiencies and omissions in the applicant's submission constitute a failure to meet the statutory criteria. According to the established legal position, where compliance with the National Marine Plan policies has not been demonstrated, or where the evidence reveals conflicts or shortcomings relative to the applicable legal and policy framework, these factors must weigh decisively against the granting of consent. Consequently, the marine licence application should be refused on the grounds that it does not satisfy the statutory requirements of the Marine (Scotland) Act 2010 nor the relevant policies of the National Marine Plan.

The proposal fails to comply with key policies of National Planning Framework 4 (NPF4), specifically Policies 3, 4, 7, and 11, which address biodiversity, natural places, historic assets, and energy. NPF4 is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. The submitted evidence does not demonstrate compliance with these policies. Furthermore, the evidence identifies deficiencies and omissions in addressing the applicable legal and policy framework. In accordance with the guidance that where compliance has not been demonstrated or conflicts exist, these matters weigh against granting consent, the proposal should be refused.

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017, alongside the equivalent marine works regulations, mandate that the likely significant environmental effects of any proposal must be identified, assessed, and reported prior to determination. Additionally, the Habitats Regulations require that the effects of the proposal on European protected sites be assessed in accordance with the applicable statutory tests. In this case, the applicant has failed to provide an adequate environmental impact assessment and habitats regulations assessment as required by law. The absence of these essential assessments means that the statutory requirements have not been met, leaving the environmental consequences of the proposal insufficiently understood and unreported.

Where compliance with these legal obligations has not been demonstrated, or where the evidence reveals deficiencies, omissions, or conflicts with the applicable legal and policy framework, such failures must weigh against the granting of consent. Given the clear lack of adequate environmental and habitats regulations assessments in this proposal, the application is fundamentally deficient and does not satisfy the necessary statutory tests. Consequently, the proposal should be refused on the grounds of non-compliance with the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the Habitats Regulations.

The proposal fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be properly considered and given due weight in the decision-making process. The submitted evidence does not show that these statutory obligations have been met, nor does it address the deficiencies and omissions identified in relation to the Act's provisions. As established by the Act and confirmed in the supporting evidence, where such compliance is not demonstrated, or where there are conflicts with the applicable legal and policy framework, these shortcomings must weigh against the granting of consent. Therefore, on the basis of the clear failure to properly consider and weigh the interests of island communities as required by the Islands (Scotland) Act 2018, this proposal should be refused.

The applicant has failed to provide robust, objective, and proportionate evidence to demonstrate compliance with every relevant statutory duty, planning policy, and environmental assessment requirement. This failure represents a fundamental deficiency in the application, as the evidential burden rests squarely with the applicant to prove that all legal and policy frameworks have been satisfied. Without such demonstration, the application remains incomplete and cannot be properly assessed against the necessary statutory and policy standards.

Moreover, the absence of demonstrated compliance is not a mere procedural oversight but a substantive failure that directly conflicts with the applicable legal and policy framework. The evidence submitted does not address or resolve these deficiencies and omissions, leaving critical questions unanswered and statutory duties unmet. This lack of compliance undermines the integrity of the planning process and the statutory protections intended to guide decision-making.

In accordance with established principles, where compliance has not been demonstrated, and where evidence reveals conflicts with legal and policy requirements, these matters must weigh decisively against the granting of consent.

Given the applicant's failure to meet the evidential burden, the proposal cannot be considered lawful or policy-compliant, and the application should therefore be refused.

1.1.803 Conflict with National Planning Framework 4 and the Development Plan

NPF4 Policy 11 explicitly supports renewable energy development; however, this support is conditional upon compliance with the policy's own impact criteria. These criteria include Policy 11(c), which addresses impacts on communities, as well as Policies 11(d) and 11(e), which concern impacts on landscape, seascape, and other receptors. The policy framework therefore requires that renewable energy proposals must not only contribute to energy goals but must also satisfactorily mitigate or avoid adverse effects on these key considerations.

In the case of the current proposal, it fails to meet these essential impact criteria. The evidence demonstrates that the development would cause significant adverse effects on nationally designated landscapes and seascapes, thereby conflicting with Policies 11(d) and 11(e). Furthermore, there is no clear demonstration that the cultural significance of scheduled monuments and their settings would be adequately protected, nor that island communities would be safeguarded in line with Policy 11(c). Additionally, the ecological tests required by the policy have not been shown to be met based on the submitted evidence. Consequently, the proposal is not consistent with the impact criteria set out in NPF4 Policy 11, undermining the policy's support for renewable energy development in this instance.

The proposal fails to comply with several National Planning Framework 4 (NPF4) policies designed to protect nationally important landscapes, heritage assets, and biodiversity, resulting in practical consequences that undermine these statutory safeguards. Specifically, Policy 11 must be read in conjunction with Policy 4(c) and 4(d), which seek to prevent significant adverse effects on the qualities of National Scenic Areas and other nationally important landscapes. Furthermore, Policies 7, including 7(h) concerning scheduled monuments and 7(c) and 7(d) regarding the setting of historic assets, impose clear duties to protect cultural significance. Policy 3 addresses biodiversity protection requirements. The evidence demonstrates that the proposal would cause significant adverse impacts on designated landscapes and seascapes, failing to uphold their protected qualities. Additionally, the applicant has not adequately demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, nor that island communities affected by the development would be safeguarded. Crucially, the ecological assessments submitted do not satisfy the necessary tests to ensure biodiversity protection as mandated by Policy 3. In light of these factors, the proposal is at odds with the cumulative policy framework of NPF4, raising substantial concerns regarding its acceptability in terms of nationally important environmental and heritage considerations.

The applicant has not put forward any effective mitigation measures that would sufficiently address the adverse impacts identified on landscape, heritage, and community interests. Consequently, the proposal's effects remain unmitigated and significant, resulting in a failure to align with the protective aims of the terrestrial

development plan policies, including those set out in the Argyll and Bute Local Development Plan 2.

In light of this, the proposal stands in clear conflict with the relevant development plan framework and National Planning Framework 4 when considered in its entirety. The absence of demonstrated mitigation confirms that the proposal is inconsistent with the land-based planning policies designed to safeguard the local environment and community well-being.

1.1.804 Seascape, Landscape and Visual Effects

There is a fundamental uncertainty regarding the applicant's assessment methodology, particularly in relation to how distance thresholds are treated. Notably, the written methodology in Appendix 16.1 does not specify any distance beyond which major effects are considered to cease. However, an independently prepared Evidence Note, drawing solely from the applicant's Chapter 16 and its appendices, reveals a consistent pattern: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of its sensitivity or visibility.

Further examination of the applicant's own documents underscores the influence distance has on their judgements. For instance, an assessment of a coastal area over 30 kilometres away explicitly states that, given the viewing distance, the scale of change is judged to be small. Additionally, the Landscape Character synthesis categorises magnitude of effect as High within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. This demonstrates a clear, though implicit, distance-related grading of impact severity.

The implication of this approach is that the protective tests required by Scottish Ministers are being applied to inputs that are systematically understated. When magnitude is moderated precisely at distances where the most sensitive designated landscapes are located, the resulting conclusions cannot be regarded as a reliable description of the effects for which consent is sought. This raises significant concerns about the robustness and accuracy of the assessment on which the decision-making process depends.

The practical consequence of relying on the visualisation materials provided in support of the assessment is that they may not accurately convey the true scale and visual impact of the proposed development as experienced on site. This limitation arises because, as acknowledged in NatureScot's visualisation guidance—which the applicant follows—printed visualisations cannot fully replicate the scale perceived by a viewer in the field. Furthermore, wireline drawings included within the same panoramic projections inherit the same constraints as the accompanying photography; they are technical renderings embedded within the visualisation rather than independent tools to correct or enhance the photographic representation. Consequently, these materials should be interpreted with caution, recognising their inherent inability to provide a fully faithful depiction of the development's visual effects.

While mitigation measures might be considered to address lighting impacts, it is important to recognise that the introduction of aviation and navigation lighting will inevitably and permanently alter the character of the night-time seascape. Currently, the sea horizon in question remains unlit, and the proposed development would introduce such lighting for the full 35-year operational lifespan of the wind farm. This change is not merely a temporary inconvenience; rather, it represents a fundamental transformation of the seascape's visual qualities during nighttime hours. Moreover, this operational timeframe does not limit the policy harm. Granting consent for this development effectively signals that the seascape is deemed appropriate for wind farm use despite the significant and enduring alteration to its night-time character. Consequently, the impact on seascape character and the associated lighting effects warrant careful consideration in light of relevant planning policies before any approval is granted.

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.

1.1.805 Cultural Landscape, Archaeology and Historic Environment

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

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

The practical consequence of the applicant's current assessment is that it risks underrepresenting the full extent of cultural significance associated with the affected heritage assets. The baseline information provided by the applicant acknowledges that these assets derive their cultural importance from a complex set of qualities, including pilgrimage, arrival by sea, and movement through a living cultural landscape. This significance is closely tied to the relationships between monuments, spirituality, and the surrounding landscape and seascape, all of which are experienced dynamically through movement rather than from static viewpoints. Moreover, Historic Environment Scotland, as noted in their consultation responses within the application, has requested additional viewpoints to ensure these broader experiential and cultural qualities are properly captured and represented. Without incorporating these wider perspectives, the assessment may fail to fully appreciate how the heritage assets function within their broader cultural landscape, potentially leading to an incomplete understanding of the impacts on their significance.

The practical consequence of relying on an understated landscape assessment is that the subsequent heritage impact conclusions lack credibility. If the landscape effects are minimised, as previously demonstrated, then any heritage assessments that depend on these landscape findings will inevitably reflect the same level of understatement.

This interdependence means that deficiencies in the landscape evaluation directly undermine the robustness of heritage conclusions. Without an accurate and comprehensive landscape assessment, the heritage impact analysis cannot be considered reliable, thereby weakening the overall planning justification.

The application fails to demonstrate adequate protection for the cultural significance of internationally and nationally important heritage assets and their settings, a deficiency that fundamentally undermines its acceptability. Without the necessary assessment to support such a conclusion, the Scottish Ministers are left without the essential evidence to determine compliance with relevant policies.

This shortfall directly contravenes National Planning Framework 4 (NPF4) Policy 7(h) concerning scheduled monuments, alongside Policies 7(c) and 7(d) which address the setting of heritage assets. Furthermore, the application does not satisfy the requirements of GEN 6 or the guidance set out in paragraphs 4.22 to 4.23 of the National Marine Plan, all of which collectively establish the framework for safeguarding heritage interests.

In the absence of a comprehensive assessment demonstrating that these heritage assets and their settings will be preserved, the application cannot be considered compliant with established policy. Consequently, it should not be approved until such evidence is properly provided and evaluated.

1.1.806 Effects on Island Communities, Tourism and the Local Economy

The assessment establishes that the island communities affected by the proposed development rely exceptionally heavily on visitors for their economic and social sustainability. These visitors are drawn specifically by the qualities identified in the applicant's own baseline studies: the distinctive landscape and seascape, the rich

cultural heritage, and the prevailing sense of tranquillity and remoteness. Any alteration to these fundamental attributes would directly undermine the economic foundation upon which these communities depend.

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

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

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

There remains significant uncertainty regarding the proposal's compliance with established policy and statutory duties concerning island communities. The National Marine Plan's GEN 19 and paragraph 4.81 mandate that decisions must be grounded in robust socio-economic evidence and adopt a precautionary approach where evidence is insufficient. Similarly, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 require that the interests of island communities be thoroughly assessed and accorded appropriate weight through meaningful engagement from the outset to the conclusion of the process. The absence of comprehensive evidence and precautionary consideration here is therefore a fundamental shortcoming.

Moreover, the applicant has acknowledged the need for particular scrutiny of island communities but has failed to carry out the necessary assessment to understand the potential effects of the proposal on these communities. There is no demonstration that the proposal aligns with the sustainability of island communities, nor that the relevant statutory duties owed to them have been fulfilled. On this basis, the proposal cannot be considered to meet the required planning and statutory

standards for protecting island communities, and it should not be approved in its current form.

1.1.807 Ecology, Biodiversity and Habitats Regulations

The development area is characterised by the presence of Priority Marine Features and Annex I habitats, indicating its high ecological value. These sensitive habitats lie within the site itself, while the surrounding waters serve as important environments for a range of protected species, including seabirds, marine mammals, and basking sharks. This establishes the site and its environs as an area of significant ecological importance and sensitivity.

The proposed development would introduce extensive construction, operational, and decommissioning activities into this delicate marine setting over a prolonged period, spanning several decades. Given the scale and duration of the proposal, there is a considerable potential for significant adverse environmental effects on the Priority Marine Features and the protected species that the surrounding waters support. Such impacts warrant careful and thorough consideration to ensure the protection of these important ecological assets.

The 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.

The applicant's evidence clarifies that under the Habitats Regulations, planning consent for developments potentially affecting protected sites can only be granted if

the competent authority is satisfied that the proposal will not adversely affect the integrity of the site. This assessment must reach a standard where no reasonable scientific doubt remains regarding the absence of adverse effects, unless the proposal meets the strict derogation tests outlined in the legislation. The responsibility for demonstrating compliance with these tests lies firmly with the applicant. Furthermore, the presence of mitigation, compensation measures, or future monitoring arrangements does not, in isolation, satisfy the statutory requirements or provide a lawful basis for consent.

This legal framework is supported by the policy context, engaging not only the Habitats Regulations but also GEN 9 and GEN 13 of the National Marine Plan, as well as relevant provisions of National Planning Framework 4, specifically Policies 3, 4(b), 4(e), and 4(f). Together, these policies reinforce the stringent evidential standards that must be met to ensure the protection of designated habitats and species. In light of this comprehensive legal and policy regime, any planning consent granted without incontrovertible scientific assurance would be contrary to established statutory and policy requirements.

The applicant's submissions, including their own derogation documents, fail to demonstrate compliance with the statutory tests designed to protect internationally important habitats and species. The evidence provided does not establish the requisite degree of certainty that these legally protected ecological features will be safeguarded. This absence of demonstrable compliance undermines the foundation upon which the application's justification for consent rests.

The statutory framework imposes rigorous obligations to ensure that any development affecting internationally designated sites meets strict criteria, including the absence of alternatives and imperative reasons of overriding public interest. The applicant's failure to satisfy these tests, as reflected in their documentation, indicates a significant shortfall in meeting these legal standards. Consequently, the planning balance cannot be favourably weighed in support of the proposal.

In conclusion, given the clear insufficiency of evidence to confirm adherence to statutory protection requirements, consent should not be granted. The protection of internationally important ecological features is a paramount legal and policy imperative that must prevail in the decision-making process.

1.1.808 Cumulative and In-Combination Effects

The practical consequence of deferring key components of the project—specifically the export cable corridor and onshore transmission works—is that the current assessment before the Scottish Ministers is inherently incomplete. These deferred elements are essential for the wind farm's operation, yet they are excluded from the principal decision and relegated to future applications. This fragmentation means that the full range of effects arising from the entire development is never evaluated collectively. Such an approach directly conflicts with the legal principle established by the courts in Raeshaw Farms, which mandates that a project must be assessed in its entirety rather than being segmented into smaller parts whose isolated impacts may appear less significant. Consequently, the current assessment process is legally

and procedurally flawed, undermining a comprehensive and transparent evaluation of the project's overall impacts.

The practical consequence of relying on the current cumulative impact assessment is that it fails to provide a reliable measure of the true combined effects of the proposed development alongside other existing, consented, and foreseeable projects. This shortcoming arises because the assessment is grounded in baseline evaluations that have themselves understated key impacts on the landscape, heritage, and socio-economic factors. As a result, the cumulative assessment does not fully capture the extent of harm that may arise from the collective developments in the area.

This issue stems from the fact that the cumulative assessments are dependent on conclusions drawn in other parts of the Environmental Impact Assessment. If those underlying assessments begin with a reduced baseline—one that does not adequately recognise the existing conditions and potential sensitivities—then the cumulative effects are inevitably minimised. In other words, any initial understatement of impacts is carried forward, meaning the aggregation of developments appears less significant than it truly is.

Therefore, the cumulative impact assessment as presented cannot be relied upon to inform sound planning decisions. Without an accurate baseline and a thorough evaluation of combined effects, there is a clear risk that the overall consequences for the environment and community are underestimated. This undermines the robustness of the Environmental Impact Assessment and suggests the need for a more comprehensive and accurate approach before the proposal is approved.

The applicant has failed to demonstrate that the cumulative and in-combination effects of the proposal have been reliably identified and assessed, contrary to the requirements set out in GEN 21 and paragraph 4.85 of the National Marine Plan, as well as NPF4 Policy 11(e) and the Environmental Impact Assessment Regulations concerning project splitting. This omission raises significant concerns regarding the adequacy of the environmental assessment and the potential for unaccounted adverse impacts arising from the proposal.

Furthermore, the absence of explicit consideration of the deferred works within the application undermines the ability to fully understand the project as a whole. The decision-making process must expressly address these deferred elements to ensure compliance with the stated policies and regulations. Without such clarity, there is a risk that the cumulative effects will be underestimated, potentially leading to environmental harm that could have been mitigated through comprehensive evaluation.

In light of these points, it is imperative that the determination of this application includes a thorough assessment of the deferred works and a reliable identification of all cumulative and in-combination effects. Only with this information can the planning authority fulfil its statutory duties and ensure that the development proceeds in a manner consistent with relevant policy and regulatory requirements.

1.1.809 Public Engagement, Site Selection and Environmental Information

The practical consequence of the deficient consultation process is that affected island communities have been denied a realistic opportunity to engage meaningfully with the site-selection proposals. The applicant requests that Scottish Ministers place significant weight on the site-selection process, yet the quality of public participation throughout this process has been inadequate, undermining its legitimacy. Notably, this deficiency has persisted into the application stage, where the volume and complexity of the technical material—spanning many thousands of pages—have posed an additional barrier to effective public scrutiny.

The timing of the consultation has further exacerbated this issue. It has coincided with the busiest months of the year for island residents, who are engaged continuously in the visitor season and thus have limited capacity to respond. Specialist advice, vital for interpreting the extensive documentation, has likewise been less accessible during this period. In contrast, the applicant has benefited from years of preparation supported by substantial professional and financial resources, resulting in a significant imbalance in the capacity to engage fully.

In light of these circumstances, it is important to recognise that GEN 18 of the National Marine Plan and the principles of effective public participation enshrined in the Aarhus Convention require that those affected by decisions of such magnitude be afforded a genuine opportunity to participate. The conditions imposed on local communities have fallen short of these standards. Therefore, Scottish Ministers are urged to take these shortcomings into account when considering the representations made, ensuring that the legitimacy of the decision-making process is not compromised by procedural deficiencies.

The practical consequence of the inadequacy of the Environmental Impact Assessment (EIA) submitted with this application is that the Scottish Ministers are unable to make an informed and lawful decision. The EIA is the principal evidential basis for determination, and its sufficiency, rather than its extent, is the critical issue. The application acknowledges potential pathways to significant environmental effects but fails to investigate these thoroughly or relies on assessment methodologies that do not substantiate the conclusions presented. For example, the landscape assessment produces outcomes based on a distance-related pattern that is not supported by the methodology outlined in the report itself; the heritage assessment fails to demonstrate the application of its own integrity test; and the socio-economic assessment lacks any place-based analysis of the islands that would be affected.

Furthermore, the application’s reliance on future assessments, post-consent plans, ongoing monitoring, and additional approvals is inconsistent with the requirements of the EIA Regulations. These regulations mandate that all likely significant effects must be properly understood and assessed before any determination is made. The approach taken by the applicant, which defers key elements of environmental assessment and mitigation to later stages, does not satisfy this fundamental regulatory requirement and leaves the decision-making process inadequately informed.

In light of these considerations, it is clear that the environmental information provided is insufficient for the Scottish Ministers to discharge their duty effectively. The applicant has not demonstrated that the evidence submitted meets the necessary

standards to enable a proper evaluation of the potential significant effects of the proposal. Therefore, the application should not be granted consent until a comprehensive and robust EIA, compliant with statutory obligations, is provided.

1.1.810 Effects on Local Area

The development area extends over 448 square kilometres immediately north-west of Islay and west of Colonsay, placing the Atlantic-facing communities of these islands in closest proximity to the proposed project. Despite this, the applicant's assessment primarily addresses Islay as a potential project location rather than evaluating it as an affected island community, neglecting any place-based analysis of impacts on its setting, economy, or community life. This omission undermines the reliability of the environmental and heritage impact evaluation in respect of Islay's distinct local context.

Similarly, Colonsay and Oronsay face the array directly, with their daily life intimately connected to the seaward outlook. Of particular significance is the North Colonsay and Western Cliffs Special Protection Area, which forms part of Colonsay's own coastline and is central to the applicant's derogation case and compensation plan. This area's inclusion highlights the acknowledged but unexcluded risk of harm to internationally protected seabird populations. Moreover, Oronsay Priory, a scheduled monument of national importance, lies within this community, yet the heritage assessment fails to adequately consider its open maritime setting. These gaps collectively demonstrate that the applicant's evaluation underestimates the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay.

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

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

Community concerns further highlight the potential severity of the proposal's impacts. A household consultation on Iona found that 92 per cent of respondents

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

The applicant's assessment fails to adequately recognise the significant practical consequences for the communities and landscapes of Mull and Ross of Mull, particularly those reliant on tourism and the integrity of designated scenic areas. Notably, the Ross of Mull South coastal area, identified as having High sensitivity at distances of approximately 22 to 24 kilometres, is assigned only a Medium magnitude of effect. Despite this, the applicant acknowledges significant impacts at Erraid and on the Core Paths of the Ross, as well as at Fionnphort—an essential gateway to Iona and a focal point for visitor flow—yet no place-based assessment has been undertaken to address the direct community implications. Similarly, across Mull, significant effects are accepted on Core Paths and within the Central, South and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, of High sensitivity over distances of approximately 21 to 33 kilometres, is nonetheless attributed no greater than Medium magnitude, a conclusion that appears inconsistent with the area's recognised landscape importance. The applicant's reliance on distance-based reasoning is exemplified by the treatment of the Wilderness and Gribun Rocks coastal area, where effects are judged small solely because the viewing distance exceeds 30 kilometres, disregarding the qualitative nature of the seascape and its value. Crucially, the west-facing tourism economy of Mull, including wildlife boat operations and accommodation providers in its western townships, depends on the unindustrialised Atlantic seascape that would be altered by the development; yet, none of these communities has been subject to a specific, place-based impact assessment. In sum, the applicant's assessment materially underestimates the visual, economic and community effects on Mull and Ross of Mull's coastal landscapes and fails to provide the detailed, location-specific analysis necessary to inform a fully informed planning decision.

The applicant's assessment recognises that Ulva, situated within the Loch na Keal National Scenic Area, shares fully in the effects experienced by that designated landscape. Ulva is a community-owned island undergoing regeneration, characterised by a small, re-establishing population whose recovery is closely tied to the unspoilt seascape and setting at risk. However, no specific assessment has been undertaken regarding the impacts on this vulnerable island community. Similarly, Staffa, located within the same National Scenic Area and renowned as one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development area—beyond the 30-kilometre distance NatureScot recommended for the assessment of effects on National Scenic Area qualities. The applicant concludes that the scale of change at Staffa would be small and the effect not significant, despite acknowledging the panoramic maritime qualities inherent to the area. The Jura National Scenic Area, assessed as having high sensitivity at a distance of approximately 28 to 32 kilometres, is attributed only a medium to low

magnitude of impact. This moderation is justified by distance, apparent scale, and the retention of landforms, notwithstanding that the designation fundamentally relies on the wild, undeveloped character of its Atlantic outlook. The Scarba, Lunga, and Garvellachs National Scenic Area, situated roughly 35 to 40 kilometres away, receives comparable treatment in the assessment. Taken together, these considerations suggest that the applicant's evaluation underestimates or omits significant effects on these important designated landscapes and the vulnerable island communities dependent upon them, thereby undermining the protection of their natural and cultural qualities.

The applicant's assessment assigns a Low magnitude of change to the South Tiree coastal area despite its designation as a receptor of High sensitivity at a distance of approximately 35 kilometres. This evaluation appears inconsistent when compared to typical mitigation standards, where sensitive landscapes exposed to large-scale vertical interventions would ordinarily warrant a higher magnitude rating to reflect the visual and character impacts adequately.

Tiree's landscape is uniquely defined by its exceptionally low-lying topography and the dominance of uninterrupted sea and sky. With its highest elevation, Ben Hynish, reaching only 141 metres, the introduction of turbines rising up to 335 metres would present unprecedented vertical intrusions on the island's seascape. Given this context, categorising the magnitude of change as Low significantly underestimates the scale of visual and experiential impact on such a sensitive receptor, thereby rendering the applicant's evaluation unreliable and insufficiently robust.

The applicant's assessment fails to consider significant effects on mainland and island communities that have direct views of, and economic reliance upon, the seascape in question. Notably, Gigha, a community-owned island celebrated nationally for its regeneration following purchase by its residents, faces the proposed development from the east. Despite the island's finely balanced community and economy, no examination of potential impacts on Gigha has been undertaken. Similarly, Ardnamurchan Point, the most westerly location on the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. The seaward panoramas of this quality represent receptors to which the applicant's distance-based moderation, as identified in this objection, is applied, thereby diminishing recognised impacts.

Furthermore, the west coast of Kintyre comprises a chain of communities whose character, outlook, and visitor economy are closely tied to the open Atlantic seaboard facing Islay, Jura, and adjacent waters. The Treshnish Isles, along with other small islands and mainland coasts with views towards the development area, share a comparable position of sensitivity. The omission of these receptors from the assessment undermines the comprehensiveness of the applicant's evaluation and raises concern that material effects on these communities have been overlooked. This gap compromises the reliability of conclusions drawn regarding the development's overall impact on seascape-related social and economic factors.

The applicant's environmental impact assessment systematically reduces the magnitude of change and discounts effects on highly sensitive receptors located beyond approximately 20 kilometres. This approach results in a quantifiable

underestimation of the impact on these distant communities, which the assessment fails to address with any place-based consideration. Consequently, significant effects that extend beyond this arbitrary threshold remain unacknowledged in the evaluation process.

Such moderation of effects beyond 20 kilometres undermines the integrity of the entire assessment. By applying a blanket distance-based cutoff, the applicant’s methodology disregards the lived experience of communities encountering these impacts, thereby omitting vital context and nuance. This omission leads to a distorted understanding of environmental consequences, particularly for those receptors that, despite their sensitivity, fall outside the narrowly defined assessment zone.

In light of this systematic discounting and the absence of tailored evaluation for affected communities beyond 20 kilometres, the environmental impact assessment cannot be considered comprehensive or robust. It is imperative that the assessment methodology be revised to incorporate place-based analysis for all sensitive receptors, irrespective of distance, to ensure that all significant effects are properly identified and addressed.

1.1.811 Personal Observations

In addition to the planning matters above, I am personally concerned because an Offshore Windfarm would destroy much of Iona's appeal. I do not live locally but I visit Iona from Australia, and it is a place that I love due to its wild, natural beauty and its historical significance. A central appeal is its remoteness and distance - you have the feeling, so rare in this time, of being at the ends of the Earth. You can stand on the top of Dun I and have a 360 degree view of the waters around the island. An Offshore Wind Farm would completely change this feeling and make the island a far less desirable destination. There are so few places where a person can have this level of tranquility and a feeling of peace away from the busy world - an Offshore Wind Farm would be a blight on the seascape, as well as having a terrible impact on the local bird life including the rare corncrake which nests on the island.

Based on my own local knowledge, I also wish to highlight that the proposal has failed to take into consideration the impact of the wind farms on local birdlife and on the landscape of Iona.

Finally, I would also ask the Scottish Ministers to consider that Iona is unique, not only to those who live there, but to those who visit from around the world and keep the local economy going. It has deep and enduring historical and spiritual significance and this is something that should be given the highest significance and respect. It is not an easy place to get to - taking a train or bus from Glasgow, then a ferry to Mull, then a bus to the other end of Mull, then another ferry - but people go there, in all weathers, to connect with this unique place of historical and spiritual significance, and to have that feeling of peace, solitude and tranquility. An offshore windfarm would completely change that, and would have an enormous impact on its desirability as a tourist/pilgrimage destination.

1.1.812 Summary

The proposal for the MachairWind Offshore Wind Farm has not been substantiated as compliant with the relevant statutory and policy frameworks governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the coastal communities and their heritage. However, analyses of the applicant's documentation reveal that the extent of these impacts has been underestimated. Crucially, the essential heritage assessment has not been undertaken, and while the effects on island communities were identified, no formal assessment of these impacts has been conducted. Furthermore, the ecological requirements have not been demonstrated as achievable, and the application presented to the Scottish Ministers encompasses only a portion of the overall project.

In light of these deficiencies, it is respectfully urged that Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm and deny the related marine licence.

Should Ministers consider granting consent, it is requested that they first require the submission of additional environmental information alongside enhanced visual representations. It is further proposed that determination of the applications be deferred until after a public inquiry, thereby allowing comprehensive scrutiny of the concerns raised in this objection. Regardless of the final decision, it is also sought that Ministers explicitly address and provide clear conclusions in their reasons regarding the impacts on cultural heritage and the island communities affected by the development.

Yours faithfully,

[Redacted]

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

Member of the public 586
Dear Sir/Madam,

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

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

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

1.1.813 Seascape, Landscape and Visual Effects

There remains significant uncertainty regarding the impact of the proposed development’s lighting on the character of the night-time seascape. The introduction of aviation and navigation lighting to a currently unlit sea horizon would result in a permanent alteration to its appearance for the stated operational life of 35 years. Importantly, this temporal limit does not mitigate the policy harm; consenting to the development effectively endorses the suitability of this seascape for wind farm use, with all attendant consequences. This raises fundamental questions about the balance between operational needs and the preservation of seascape character that require careful consideration.

The proposal’s acknowledged effects on landscape and seascape interests are significant and engage multiple key policies, specifically NPF4 Policies 4(c), 4(d), 11(d), 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively serve to safeguard nationally important landscapes and seascapes, establishing a clear framework against which the proposal must be assessed.

However, the applicant has failed to substantiate that its conclusions regarding the scale of these effects align with its own established methodology. This lack of methodological consistency undermines the reliability of the impact assessment and

calls into question the robustness of the evidence presented in support of the proposal. Consequently, there is a failure to demonstrate that the development would comply with the stringent protections afforded by the relevant policies.

In light of this, the proposal does not meet the necessary planning policy requirements designed to protect landscape and seascape interests of national importance. Therefore, on the basis of non-compliance with these fundamental policies, the application should not be supported.

1.1.814 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment acknowledges that the cultural significance of the heritage assets in question is not solely derived from their physical presence but from a complex set of experiential qualities. These include elements such as pilgrimage routes, arrival by sea, the sense of movement through a living cultural landscape, and the interrelationships between monuments, spirituality, and the encompassing landscape and seascape. Notably, these attributes are experienced dynamically through movement rather than static viewpoints, a factor that the applicant recognises in their baseline recording.

However, despite this recognition, the mitigation measures proposed appear insufficient to fully capture or preserve these broader cultural and experiential qualities. Historic Environment Scotland's consultation responses, as documented within the application, explicitly requested additional viewpoints to ensure that the assessment would adequately represent these wider landscape and seascape attributes. The absence of such comprehensive visual and experiential analysis potentially undermines the understanding of the heritage assets' significance and the effectiveness of the proposed mitigation. Consequently, there is a concern that the current assessment underrepresents the full cultural context and may not sufficiently safeguard the intangible qualities that contribute to the heritage assets' value.

The applicant's evidence acknowledges that the heritage conclusions rely heavily on the findings of the landscape assessment. This interdependence means that any shortcomings within the landscape evaluation will inevitably affect the accuracy of the heritage impact conclusions. In particular, where landscape effects have been understated, as indicated previously, the resulting heritage assessment inherits this same understatement.

Such a reliance raises concerns regarding the overall robustness of the heritage conclusions presented. If the landscape assessment does not fully capture the extent or significance of landscape effects, then the subsequent heritage analysis may fail to recognise or appropriately weigh potential adverse impacts. This calls into question the credibility of the conclusions drawn about the heritage implications of the proposed development.

Accordingly, it is important to scrutinise the landscape assessment thoroughly, as any deficiencies will have a direct bearing on the validity of the heritage conclusions. Without a comprehensive and accurate landscape evaluation, the heritage impact appraisal risks being incomplete or misleading. Therefore, decision-makers should

be cautious in placing full confidence in the heritage conclusions until the landscape effects have been adequately addressed.

The application as submitted fails to comply with essential policy requirements designed to protect heritage assets, thereby undermining its acceptability. Specifically, it engages National Planning Framework 4 (NPF4) Policy 7(h), which addresses scheduled monuments, along with Policies 7(c) and 7(d) concerning the setting of heritage assets. These policies are complemented by GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan, which collectively establish a robust framework for safeguarding the cultural significance of heritage assets of international and national importance.

Despite this clear policy context, the applicant has not provided sufficient evidence to demonstrate that the cultural significance of these heritage assets and their settings will be protected. Critically, the Scottish Ministers have not been presented with the necessary assessment that such a conclusion would require. Without this assessment, there can be no assurance that the development will respect or preserve the heritage values enshrined in these policies.

In conclusion, the failure to meet these key policy obligations in relation to heritage protection renders the application unacceptable in its current form. It is therefore recommended that the application be refused on these grounds unless and until a comprehensive and satisfactory assessment is provided.

1.1.815 Effects on Island Communities, Tourism and the Local Economy

The proposed development poses a significant threat to the fundamental economic and social sustainability of the island communities concerned. These communities rely exceptionally heavily on visitors, who are attracted precisely by the qualities identified in the applicant’s own baseline assessments: the landscape, seascape, cultural heritage, tranquillity and remoteness. Any alteration to these defining attributes would directly undermine the economic foundation upon which these communities depend.

Such an impact would extend beyond mere economics, affecting local services, population stability and the overall viability of the island settlements. The interdependence between the visitor experience and community sustainability is clear, and therefore the proposal’s effect on the qualities that draw visitors must be considered with the utmost seriousness.

The applicant’s own consultants have acknowledged that habitability represents a potentially significant pathway through which the proposal could impact island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 focuses primarily on regional analysis, providing detailed examination of potential port communities but omitting a comparable place-based evaluation of the island communities directly facing the development. Notwithstanding this absence, the assessment nonetheless concludes that these island communities exhibit low sensitivity to tourism effects. This approach fails to

address the particular circumstances of the islands and thereby undermines the reliability of the conclusions drawn.

Small island economies cannot be accurately represented as regional averages, given that their economic structures are often concentrated in sectors most vulnerable to fluctuations in the qualities that attract visitors. Rather than reducing sensitivity, a dependence on increasing visitor numbers intensifies reliance on these qualities, which are precisely those at risk from the proposed development. Therefore, the assertion of low sensitivity to tourism impacts, reached without any place-specific analysis, is unfounded and amounts to an unsubstantiated assumption rather than evidence. This fundamental flaw in the applicant's socio-economic assessment methodology calls into question its adequacy in understanding or mitigating the effects on island communities.

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

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

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

1.1.816 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, as identified in the applicant's evidence. Additionally, the surrounding waters serve as habitats for seabirds, marine mammals, and basking sharks. This highlights the ecological importance and sensitivity of the site, given the presence of these protected species and habitats.

The proposed development would introduce extensive construction, operational, and decommissioning activities into this environmentally sensitive area over several decades. Such large-scale and prolonged disturbance carries a significant risk of adverse environmental effects on the Priority Marine Features and protected species present, necessitating careful consideration of potential impacts and mitigation measures.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan focused specifically on the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are typically prepared for circumstances where an adverse effect on the integrity of a protected site cannot be ruled out. Their inclusion in the application is therefore a material consideration, signalling the applicant's acknowledgement of potential impacts.

Importantly, the applicant's approach concedes that Scottish Ministers may reach a different conclusion regarding adverse effects on the protected site's integrity. This recognition underscores that the submitted derogation and compensation documents are intended to address and mitigate potential impacts in accordance with relevant provisions, rather than to pre-empt regulatory assessment. As such, these documents form a critical component of the application's approach to compliance with protection requirements.

The legal framework governing developments affecting protected habitats is set out clearly under the Habitats Regulations. As established in the applicant's evidence, consent for such proposals may only be granted once the competent authority has ascertained that the integrity of the protected site will not be adversely affected, except in circumstances where the stringent derogation tests are satisfied. Crucially, the law requires that no reasonable scientific doubt remains regarding the absence of adverse effects before consent can be lawfully given. This places a significant evidential burden on the applicant, who must demonstrate beyond reasonable doubt that the statutory tests are met. Importantly, mitigation measures, compensation proposals, and commitments to future monitoring, while relevant to the overall assessment, do not in isolation suffice to prove compliance with these legal requirements.

This rigorous standard is supported and reinforced by relevant planning policies, including GEN 9 and GEN 13 of the National Marine Plan, alongside Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). Together, these policies embody the necessity for a high threshold of evidence and precaution in protecting designated habitats and species. The combined legal and policy framework thus ensures that any development proposals must provide robust and conclusive evidence that their implementation will not compromise protected sites, rather than relying solely on future promises or uncertain mitigation strategies.

In conclusion, given the exacting nature of these legal and policy requirements, any consent for development affecting protected habitats must be predicated on clear, definitive evidence demonstrating no adverse effect on site integrity. Without such evidence, and in the absence of fully satisfied derogation tests, approval would be inconsistent with both the Habitats Regulations and the relevant marine and planning policies.

The applicant's submission fails to demonstrate compliance with the statutory tests intended to protect internationally important habitats and species, as evidenced by their own derogation documents. These documents reveal a lack of sufficient certainty that the legal requirements can be met, which is critical when considering the potential impacts on such ecological features.

Given this insufficiency, the case for granting consent is fundamentally undermined. Without clear assurance that the statutory protections will be satisfied, the proposal cannot be deemed legally compliant or environmentally responsible. Consequently, the application should not be approved in its current form.

1.1.817 Effects on Local Area

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

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

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

The applicant's assessment of visual and community impacts on Iona significantly underestimates their scale and importance, particularly when compared to established mitigation benchmarks. The Coastal Character assessment assigns the Sound of Iona a high sensitivity, noting its direct orientation towards the development area and extensive visibility. The scale of visual change is substantial, spanning approximately 21 kilometres with turbines covering about 39 degrees of the horizon. This magnitude of effect is classified as Moderate and Significant. Similarly, the West Coast of Iona is recognised as highly sensitive with widespread visibility, and the applicant acknowledges significant effects for residents and visitors across much of the island, including at Dùn Ì, the highest point. However, such recognition falls short of adequately addressing the depth of impact, especially given that familiar landmarks like Ben Hynish on Tiree, standing at 141 metres and visible from 33 kilometres, would be visually dominated by turbines extending roughly 194 metres at a closer distance of approximately two-thirds that range. This comparison

underscores the disproportionate visual intrusion posed by the proposed development, which the applicant's own evaluation does not fully mitigate.

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

The applicant's assessment acknowledges significant effects on several key areas of Mull and Ross of Mull, including the Ross of Mull South coastal area, which is identified as having High sensitivity at distances of approximately 22 to 24 kilometres and is attributed a Medium magnitude of impact. Notably, significant effects are accepted at Erraid and on the Core Paths of the Ross, as well as at Fionnphort—the critical gateway to Iona and the embarkation point for visitors—where the community's experience is recognised as being significantly affected due to its direct connection to visitor flows.

Across Mull more broadly, the applicant concedes significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Areas. The Loch na Keal National Scenic Area, encompassing the western waters and islands of Mull, is assessed as having High sensitivity throughout a range of approximately 21 to 33 kilometres, yet the magnitude of impact attributed does not exceed Medium. This raises concerns regarding the adequacy of the assessment in capturing the true extent of effects within these designated landscapes.

Further, the approach taken to areas such as the Wilderness and Gribun Rocks coastal area—where the applicant reasons that the scale of change is small due to viewing distances exceeding 30 kilometres—exemplifies a reliance on distance-based criteria that may understate potential impacts. Crucially, the west-facing tourism economy of Mull, along with its wildlife boat operations and accommodation in western townships, depend heavily on the Atlantic seascape, which the proposed development would industrialise. Despite this, none of these communities have been the subject of a place-based assessment, leaving a significant gap in understanding and addressing the localised economic and community effects.

The applicant's assessment underestimates the practical consequences for important designated landscapes and vulnerable island communities, notably by omitting any consideration of Ulva. This island, situated within the Loch na Keal National Scenic Area, is a small, community-owned settlement at the outset of

regeneration. Its recovery is closely tied to the preservation of its natural setting and unspoilt seascape, yet the applicant has made no assessment of effects on Ulva's unique qualities, thereby overlooking critical factors that support the community's viability and cultural identity.

Similarly, the treatment of other designated landscapes appears insufficiently rigorous. Staffa, another island within the Loch na Keal National Scenic Area and renowned across Europe, lies approximately 35 kilometres from the development area—beyond the 30 kilometre limit suggested by NatureScot for assessing effects on National Scenic Area qualities. Despite the applicant's recognition of the panoramic maritime qualities of Staffa, it concludes that the scale of change would be small and the effect not significant. The Jura National Scenic Area, assessed at about 28 to 32 kilometres distance and of high sensitivity, is attributed only a medium to low magnitude of effect, justified by distance and retained landforms, even though its designation fundamentally depends on its wild, undeveloped Atlantic character. The Scarba, Lunga and the Garvellachs National Scenic Area, located some 35 to 40 kilometres away, receives comparable treatment. Collectively, these assessments appear to downplay the potential impacts on the natural and cultural qualities that underpin these designated landscapes and island communities.

The applicant's assessment leads to a practical underestimation of the impact on Tiree's landscape by assigning a Low magnitude of change despite the island's High sensitivity. Tiree's uniquely low-lying topography, with its highest point at just 141 metres, means that its entire landscape character is dominated by expansive sea and sky views. Introducing turbines reaching up to 335 metres would create unprecedented vertical features in this open oceanic horizon, fundamentally altering the island's distinctive seascape. Given this context, the conclusion of Low magnitude is not credible and significantly understates the true scale of change and visual impact on such a sensitive receptor.

The applicant's assessment fails to consider significant effects on mainland and island communities that have direct visual and economic connections to the seascape in question. Notably, Gigha, a community-owned island emblematic of island regeneration, faces the development from the east, yet the potential impacts on its delicate community balance and economy remain unexplored. Similarly, Ardnamurchan Point—the most westerly tip of the British mainland—offers panoramic views along the Hebridean seaboard, attracting visitors whose experience depends on the unspoiled seaward panoramas. These receptors, critical to the local visitor economy, appear to be dismissed through a distance-based moderation approach. Furthermore, the west coast of Kintyre encompasses a series of communities whose identity and tourism are closely tied to the open Atlantic seaboard views towards Islay, Jura, and adjacent waters. The Treshnish Isles and other small islands and mainland coasts with sightlines to the development area share this vulnerability. The omission of these communities from thorough assessment undermines the comprehensiveness and reliability of the applicant's environmental evaluation.

The practical consequence of the applicant's distance-based approach to environmental impact assessment is a systematic underestimation and discounting of significant effects on sensitive receptors located beyond approximately 20

kilometres. This methodology results in a moderated magnitude of change assigned to these receptors, despite their acknowledged sensitivity. Critically, the communities residing in these areas have not been afforded any place-specific assessment of the impacts they are likely to experience. Taken together, these factors demonstrate a consistent pattern within the applicant's assessment whereby effects on distant yet highly sensitive receptors are diminished in importance solely due to their distance from the site. Such an approach undermines the integrity and comprehensiveness of the environmental impact assessment by failing to fully recognise and evaluate the true extent of potential effects on these communities. Consequently, the assessment does not provide a robust or reliable basis for decision-making regarding the wider environmental and social consequences of the proposed development.

1.1.818 Personal Observations

In addition to the planning matters above, I am personally concerned because: As one who has traveled to and spent time in this region I am deeply concerned about the impact on the local communities' quality of life and economy. I am also deeply considered about the impact on marine and wildlife that depend on a natural environment for their wellbeing and thriving.

1.1.819 Summary

The proposal submitted fails to demonstrate compliance with the relevant statutory and policy frameworks governing its determination. The applicant's own assessment acknowledges significant impacts on nationally designated landscapes, as well as on the coastal communities and their heritage. Furthermore, analysis of the applicant's published documents reveals that these impacts have been understated. Crucially, the necessary heritage assessment has not been undertaken. Although the effects on the island communities affected by the project were identified, they have never been properly evaluated. Additionally, the ecological criteria required for consent have not been proven achievable. It should also be noted that only a portion of the development is currently before the Scottish Ministers for consideration.

In light of these deficiencies, it is respectfully urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm proposal, along with the associated marine licence application.

Should the Ministers decide against refusal, it is requested that they require the submission of further environmental information and enhanced visualisations. It is also recommended that the applications be determined only following a public inquiry, during which the issues raised in this objection can be thoroughly scrutinised. Regardless of the final decision, it is further requested that the Ministers explicitly state their conclusions concerning the impacts on cultural heritage and the affected island communities within their stated reasons.

Yours faithfully,

[Redacted]

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

Member of the public 587
Dear Sir/Madam,

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

My objection is founded upon detailed planning and environmental considerations, evaluated within the statutory and policy frameworks governing these applications. It is important to emphasise that the onus lies firmly on the applicant to provide robust evidence demonstrating full compliance with all relevant tests and requirements. Objectors, such as myself, bear no obligation to establish contrary evidence. Upon careful review, it is clear that the applicant has failed to meet this evidentiary burden. Therefore, I contend that consent for these proposals must be refused.

I request that this letter be accepted as a formal objection, that I be recorded as an objector in the decision-making process, and that I receive notification of the final determination regarding these applications.

1.1.820 Legislative and Policy Framework

The application fails to demonstrate adequate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989. This statutory framework explicitly requires the applicant to have regard to the desirability of preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant must take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The Scottish Ministers, in determining the application, are similarly bound to have regard to these statutory duties.

The evidence before the determining authority does not establish that these requirements have been met. There is a clear absence of demonstrated regard to the preservation of natural beauty and conservation of important ecological and geological features. The application also lacks sufficient consideration of the protection of heritage assets, including sites, buildings, and objects of architectural, historic, or archaeological significance. Crucially, the applicant has not shown that reasonable steps have been taken to mitigate adverse effects on these protected interests.

Given these deficiencies and omissions, the application conflicts with the applicable legal and policy framework mandated by Schedule 9 of the Electricity Act 1989.

Where such compliance has not been demonstrated, the statutory regime and established planning principles dictate that these matters must weigh decisively against the granting of consent. Accordingly, the application should be refused on the grounds of failure to satisfy the statutory duties under Schedule 9.

The marine licence application submitted under Part 4 of the Marine (Scotland) Act 2010 fails to demonstrate compliance with the statutory requirements and the relevant policies set out in Scotland's National Marine Plan. The application does not adequately address the General Policies critical to the assessment, including GEN 4 on Co-existence, GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 and paragraph 4.85 on Cumulative Impacts. The absence of clear evidence demonstrating conformity with these policies constitutes a fundamental deficiency in the application's statutory assessment.

Given that compliance with the National Marine Plan policies is a mandatory part of the authorisation decision under the Marine (Scotland) Act 2010, the failure to provide sufficient evidence or to resolve identified omissions and conflicts with the legal and policy framework weighs decisively against the granting of consent. The application's shortcomings in meeting the required standards of evidence and policy adherence undermine the statutory determination process and render the proposal incompatible with the established marine planning regime. Consequently, the marine licence application should be refused on the grounds of non-compliance with the Marine (Scotland) Act 2010 and the National Marine Plan.

The applicant's submission acknowledges that National Planning Framework 4 (NPF4) is a significant material consideration and that its policies must be applied alongside relevant statutory duties and legislative requirements. Specifically, the proposal engages Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy), as set out in the applicant's own evidence (S01). This recognition confirms the necessity for the proposal to demonstrate full compliance with these policies to be considered acceptable.

However, the evidence before the determining authority does not demonstrate compliance with these key policies. There are clear deficiencies and omissions in the applicant's submission regarding the protection and enhancement of biodiversity and natural places, as required by Policies 3 and 4. Similarly, the proposal fails to adequately address the safeguarding of historic assets and places under Policy 7. Furthermore, the application does not provide sufficient evidence to satisfy the energy-related requirements of Policy 11. These shortcomings represent material conflicts with the applicable legal and policy framework established by NPF4.

Given these unresolved deficiencies and the absence of demonstrated compliance, the proposal conflicts with the statutory and policy framework set out in NPF4. As confirmed in the applicant's own evidence (S01), where compliance has not been demonstrated or where evidence identifies such conflicts, these matters weigh against the granting of consent. Therefore, the proposal should be refused planning permission on the basis that it fails to meet the essential requirements of National Planning Framework 4.

The proposal fails to provide the required comprehensive environmental impact assessment and habitats regulations assessment as mandated by law. Under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations, it is a statutory requirement that the likely significant environmental effects of the development be fully identified, assessed, and reported prior to any determination. Furthermore, the Habitats Regulations impose a clear duty to assess the effects of the proposal on European protected sites in strict accordance with the applicable statutory tests.

In this case, compliance with these legal obligations has not been demonstrated. The submitted evidence reveals deficiencies and omissions in the environmental impact assessment and habitats regulations assessment, resulting in a failure to meet the necessary statutory standards. Such shortcomings constitute a direct conflict with the established legal and policy framework governing environmental protection and habitat conservation.

Given these unresolved deficiencies and the absence of adequate assessment, the proposal does not satisfy the mandatory requirements of the relevant environmental legislation. Consequently, these failures weigh decisively against the granting of consent for the development.

The proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018, thereby rendering the decision-making process legally deficient. The Islands (Scotland) Act 2018 explicitly requires that the interests of island communities be taken into account and given due weight during planning determinations. This statutory obligation is not a discretionary consideration but a mandatory requirement that must be demonstrably fulfilled to ensure lawful decision-making.

In this case, the application documentation and supporting evidence do not provide any substantive analysis or assessment of the potential impacts on island communities, nor do they demonstrate how these interests have been integrated into the planning balance. The absence of such consideration constitutes a clear omission and a failure to comply with the statutory framework established by the Islands (Scotland) Act 2018. Without evidence of compliance, the decision-making process is incomplete and flawed.

Furthermore, where compliance with the Islands (Scotland) Act 2018 has not been demonstrated, or where deficiencies and omissions exist in addressing the interests of island communities, these shortcomings must weigh against the granting of planning consent. The failure to properly consider these interests undermines the legitimacy of the proposal and conflicts with the applicable legal and policy framework designed to protect island communities.

In conclusion, the proposal does not meet the statutory requirements of the Islands (Scotland) Act 2018 due to its failure to properly consider and give due weight to the interests of island communities. This fundamental deficiency weighs decisively against the granting of planning permission.

The applicant has failed to discharge the fundamental responsibility of demonstrating compliance with all relevant statutory duties, planning policies, and environmental assessment requirements through robust, objective, and proportionate evidence. This evidential burden is a prerequisite for lawful decision-making and must be met in full to justify the granting of planning consent.

The submitted documentation contains significant deficiencies and omissions that undermine any claim of compliance. Where such failures exist, they constitute clear conflicts with the applicable legal and policy framework. These unresolved matters cannot be overlooked or treated as minor procedural errors; they weigh decisively against the approval of the proposal.

In conclusion, the absence of satisfactory evidence to prove adherence to all statutory and policy obligations renders the application fundamentally flawed. On this basis alone, the proposal should be refused consent in accordance with established planning principles and legal requirements.

1.1.821 Conflict with National Planning Framework 4 and the Development Plan

While NPF4 Policy 11 endorses renewable energy development, this support is explicitly conditional upon compliance with its impact criteria, notably those addressing effects on communities, landscapes, seascapes, and other receptors. The proposal under consideration falls short of meeting these criteria, as it fails to demonstrate effective mitigation of significant adverse impacts. The policy's requirements, particularly Policy 11(c) concerning community impacts and Policies 11(d) and 11(e) relating to landscape and seascape effects, are not satisfactorily addressed by the submitted evidence. Consequently, the proposal does not align with the intended balance between renewable energy advancement and environmental and social safeguards established by NPF4.

Moreover, the proposal's deficiencies extend to the protection of cultural and ecological assets. It does not adequately prove that the cultural significance of scheduled monuments and their settings would be preserved, nor that the interests of island communities would be safeguarded. Additionally, the ecological tests mandated by the policy have not been convincingly met. These shortcomings collectively indicate a conflict with the impact criteria of NPF4 Policy 11, undermining the policy's framework that supports renewable energy only where such impacts are properly managed and mitigated. As such, the proposal cannot be considered compliant with the policy and should not be supported.

The practical consequence of the proposal is that it would result in significant adverse effects on multiple nationally important designated assets, undermining key protections established by the National Planning Framework 4 (NPF4). Specifically, the proposal fails to comply with Policy 11 and related provisions such as Policy 4(c) and 4(d), which safeguard National Scenic Areas and other nationally important landscapes by preventing significant harm to the qualities that justify their designation. Moreover, it conflicts with Policy 7, including Policy 7(h) concerning scheduled monuments and Policies 7(c) and 7(d) regarding the settings of historic assets. The evidence clearly indicates that these cultural heritage considerations

have not been adequately addressed to demonstrate protection or appropriate mitigation.

In addition, the proposal does not meet the requirements of Policy 3 relating to biodiversity. The submitted evidence falls short of demonstrating that the ecological tests, which are fundamental for safeguarding biodiversity, can be satisfied. It also fails to show that island communities, which may be particularly vulnerable, would be adequately safeguarded in accordance with the framework. Taken together, these shortcomings indicate that the proposal conflicts with multiple NPF4 policies designed to protect nationally designated landscapes, heritage assets, and biodiversity, and therefore cannot be supported without significant revision and further evidence.

The applicant's evidence acknowledges that, in relation to terrestrial impacts, the proposal conflicts with the Argyll and Bute Local Development Plan 2. It is recognised that the development would adversely affect the landscape character, heritage assets, and community interests that the Plan seeks to safeguard. These identified adverse effects highlight a clear inconsistency with the objectives and protections established within the local development plan framework.

This conflict extends beyond the local level to encompass the wider spatial planning context, as the proposal also fails to align with the National Planning Framework 4 when considered in its entirety. The applicant has not provided sufficient justification or evidence to demonstrate that these conflicts can be mitigated or overridden. Consequently, the proposal remains at odds with the relevant terrestrial development plan policies and the national planning framework, undermining its conformity and acceptability.

1.1.822 Seascape, Landscape and Visual Effects

The applicant's assessment methodology, as set out in Appendix 16.1, notably lacks a defined distance threshold beyond which major effects are considered to cease. Nevertheless, a comprehensive review of the applicant's Chapter 16 and Appendices 16.1 to 16.3, as presented in a published Evidence Note supporting community objections, reveals a consistent pattern: no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of its sensitivity or the extent of visibility. This observation is corroborated by the applicant's own documentation, which acknowledges the influence of distance in the evaluation of effects. For example, an assessment of a coastal area over 30 kilometres away explicitly states that, given the viewing distance, the scale of change is judged to be small. Furthermore, the Landscape Character synthesis categorises magnitude as High within roughly 20 kilometres, Medium between approximately 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types.

This systematic moderation of magnitude at distances coinciding with the locations of the most sensitive designated landscapes raises significant concerns regarding the reliability of the conclusions drawn. By effectively applying protective tests to understated inputs, the assessment underrepresents the true scale of effects at critical distances. Consequently, the outcomes do not provide a dependable

description of the impacts that the Scottish Ministers are being requested to consent to. It is therefore imperative that the assessment methodology be scrutinised and revised to accurately reflect the magnitude of change at all relevant distances, ensuring that the decision-making process is fully informed.

The visualisation materials submitted in support of the application are inherently limited in their ability to convey the true scale and impact of the development as experienced on site. According to NatureScot's visualisation guidance, which the applicant follows, printed visualisations cannot fully replicate the scale perceived by a viewer in the field. Furthermore, the wireline drawings included within the panoramic projections share these same limitations, as they are technical renderings embedded within the visualisation rather than independent corrections or enhancements. Consequently, reliance on these materials alone may lead to an underestimation of the development's visual effects, and this should be carefully considered in the assessment process.

While mitigation measures may seek to minimise the visual impact of the proposed development during daylight hours, they cannot address the fundamental alteration introduced by the required aviation and navigation lighting. The existing night-time seascape benefits from an absence of artificial illumination, presenting a naturally dark horizon that contributes significantly to its character. The installation of lighting for safety and operational compliance would permanently change this character throughout the 35-year operational life of the development, creating a new and continuous source of brightness that is currently absent.

Furthermore, the temporal limitation of 35 years does not diminish the policy implications of this harm. Granting consent for this development effectively endorses the suitability of this seascape for wind farm use, including the acceptance of its altered night-time character. This sets a precedent that may undermine the protection of seascape qualities valued in planning policy. Therefore, the impact of lighting on the night-time seascape character must be given substantial weight in the decision-making process, recognising that mitigation cannot fully preserve the existing environmental and visual qualities of the site.

The proposal's acknowledged effects on landscape and seascape interests are significant and directly engage multiple key policies, specifically NPF4 Policies 4(c) and 4(d), 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively provide a robust framework intended to safeguard nationally important natural and coastal environments from adverse impacts.

However, the applicant has failed to demonstrate that its assessment of the scale of these effects aligns with the methodology it sets out. This lack of internal consistency undermines confidence in the conclusions presented, raising serious doubts about the reliability of the impact evaluation. Without a clear and methodologically sound justification, it is not possible to ascertain whether the proposal adequately protects the sensitive landscape and seascape features recognised in the relevant planning policies.

In light of these shortcomings, it is evident that the proposal does not comply with the essential provisions designed to protect nationally important landscapes and seascapes. Consequently, the development should not be supported as it stands, given its failure to meet the requirements of policies intended to ensure the preservation and enhancement of these vital environmental assets.

1.1.823 Cultural Landscape, Archaeology and Historic Environment

The assessment submitted by the applicant fails to demonstrate adherence to the required methodology for evaluating the effects on the setting of historic assets, thereby calling into question the reliability of its conclusions regarding heritage impacts. Although the applicant adopts Historic Environment Scotland's recognised approach—developed and refined through consultation with that body—which mandates an evaluation of whether changes to setting affect the contribution setting makes to cultural significance and whether the integrity of setting is adequately retained, the assessment does not satisfy these requirements. Notably, the methodology explicitly states that visual change alone should not be equated directly with adverse impact, underscoring the need for a nuanced evaluative process.

A Methodological Audit prepared to support community objections, relying entirely on the applicant's Appendix 14.3, confirms that while the operational assessment identifies relevant heritage attributes, it does not clearly demonstrate how the integrity of setting has been assessed in accordance with the applicant's own accepted methodology. The assessment primarily describes visual changes such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, before concluding that the integrity of setting remains adequately retained. However, this critical evaluative step—central to the adopted methodology—is absent in all the worked examples examined by the Audit. This omission undermines confidence in the assessment's findings and raises serious concerns about its overall robustness in relation to heritage impacts.

While the applicant has sought to mitigate heritage impacts through various measures, it is important to consider whether these adequately address the broader cultural landscape and experiential qualities that underpin the significance of the affected assets. The applicant's own baseline acknowledges that the heritage significance is not confined to discrete monuments or static views but is deeply rooted in dynamic qualities such as pilgrimage, arrival by sea, and movement through a living cultural landscape. This understanding underscores the importance of the relationships between monuments, spirituality, and the surrounding landscape and seascape, which are experienced through movement rather than from fixed viewpoints.

In this context, the applicant's assessment may not fully capture the extent of these wider cultural qualities. Historic Environment Scotland, in their consultation responses documented within the application, requested additional viewpoints to ensure that these experiential and landscape relationships are properly represented. This suggests that the initial assessment might have been limited in scope, potentially overlooking key aspects of cultural significance that contribute to the heritage assets' value.

Therefore, while mitigation efforts are acknowledged, there remains a concern that without a comprehensive representation of these broader cultural and experiential elements, the heritage impact assessment risks underestimating the true significance of the site. It would be prudent for the assessment to incorporate these wider perspectives to inform more effective and sensitive heritage protection measures.

The heritage impact conclusions presented rely fundamentally on the underlying landscape assessment. As identified, where the landscape effects have been understated, this shortcoming directly influences the accuracy and reliability of the heritage conclusions derived from that assessment. The inherent dependency means that any minimisation of landscape impacts inevitably leads to a corresponding understatement in the evaluation of heritage effects.

Consequently, the credibility of the heritage impact conclusions is compromised by the deficiencies in the landscape assessment. Without an accurate and thorough appraisal of landscape effects, the heritage impacts cannot be properly understood or mitigated, thereby undermining the overall robustness of the planning case. This interdependency highlights the need for a more comprehensive and transparent landscape assessment to ensure that heritage impacts are not underestimated.

The application engages directly with key national policies concerning heritage protection, specifically NPF4 Policy 7(h) relating to scheduled monuments, as well as Policies 7(c) and 7(d) which address the setting of heritage assets. Additionally, it invokes the provisions of Policy GEN 6 and the guidance contained within paragraphs 4.22 to 4.23 of the National Marine Plan. These policies collectively establish a rigorous framework intended to safeguard the cultural significance of heritage assets of international and national importance, ensuring their settings are preserved in the planning process.

Despite the clear policy context, the applicant has not provided sufficient evidence to demonstrate that the cultural significance of these heritage assets and their settings will be adequately protected. Crucially, the Scottish Ministers have not been presented with the comprehensive assessment necessary to reach such a conclusion. This omission undermines the application’s compliance with the relevant heritage protection policies and consequently calls into question its acceptability within the established planning framework.

1.1.824 Effects on Island Communities, Tourism and the Local Economy

The applicant’s own baseline assessments confirm that the island communities affected by the proposed development rely exceptionally heavily on visitor numbers, with those visitors being attracted primarily by the very qualities identified as landscape, seascape, cultural heritage, tranquillity and remoteness. These attributes are not peripheral to the local economy but form its core appeal; visitors seek out these distinctive characteristics, which define the islands’ unique sense of place and underpin their tourism sector. This sector, in turn, sustains a wide range of local services, supports employment, and contributes directly to the social fabric and economic resilience of the communities. Any alteration or degradation of these

qualities would therefore have a direct and deleterious impact on the fundamental economic base upon which the islands depend.

Given this intrinsic link, the proposal's potential to diminish landscape, seascape, cultural heritage, tranquillity or remoteness threatens not only the immediate visitor experience but also the longer-term viability of the islands as sustainable communities. A reduction in visitor appeal would likely precipitate a decline in tourism revenue, undermining local businesses and services that are vital to residents' quality of life. This, in turn, could lead to population decline as economic opportunities diminish and community viability is compromised. The evidence thus establishes a clear and significant risk that the proposal would impact adversely on the essential qualities attracting visitors and, through that pathway, imperil the economic and social sustainability of the island communities.

The applicant's socio-economic assessment notably prioritises detailed analysis of port communities while neglecting a comparable place-based evaluation of the island communities directly facing the proposed development. Although their consultants recognised habitability as a potentially significant pathway for impacts on these islands, no subsequent assessment was undertaken to determine how the proposal might affect their habitability. This omission undermines confidence in the mitigation measures proposed, as these are predicated on an incomplete understanding of local sensitivities.

Island economies differ fundamentally from regional averages, being heavily concentrated in sectors that depend on the very qualities attracting visitors. Such reliance does not diminish their vulnerability; rather, it intensifies their exposure to any adverse changes. The applicant's conclusion that these communities exhibit low sensitivity to tourism effects, derived without specific place-based analysis, cannot be regarded as evidence-based but instead represents an unsubstantiated assumption. This calls into question the adequacy of the assessment's methodology and its capacity to inform appropriate mitigation.

Given these concerns, the socio-economic impacts on island communities require a more rigorous and locally focused evaluation. Without this, the assessment risks underestimating the true extent of potential harm and fails to provide a robust foundation for effective mitigation strategies. It is therefore essential that further, detailed place-specific analysis be undertaken to ensure that the unique vulnerabilities of island communities are properly understood and addressed.

The proposal fails to meet the necessary planning and statutory requirements for assessing and protecting island communities, resulting in a significant shortfall in compliance with established policies and duties. According to GEN 19 and paragraph 4.81 of the National Marine Plan, decision-making must be grounded in robust socio-economic evidence and adopt a precautionary approach where evidence is incomplete. Furthermore, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 mandate that the interests of island communities are thoroughly assessed and given due weight through meaningful engagement from the earliest stages through to the conclusion of the process. Despite recognising the particular scrutiny required for island communities, the applicant has not conducted the necessary assessment to understand the proposal's effects on these populations.

Consequently, there is no demonstrated compatibility with the sustainability of island communities, nor is there evidence that the statutory duties owed to these communities have been fulfilled. In summary, the proposal does not comply with key policy and statutory frameworks aimed at safeguarding island communities, and as such, it falls short of the standards required for approval.

1.1.825 Ecology, Biodiversity and Habitats Regulations

The development area is characterised by the presence of Priority Marine Features and Annex I habitats, indicating its high ecological value. These sensitive habitats lie within the site itself, while the surrounding waters serve as important environments for a range of protected species, including seabirds, marine mammals, and basking sharks. This establishes the site and its environs as an area of significant ecological importance and sensitivity.

The proposed development would introduce extensive construction, operational, and decommissioning activities into this delicate marine setting over a prolonged period, spanning several decades. Given the scale and duration of the proposal, there is a considerable potential for significant adverse environmental effects on the Priority Marine Features and the protected species that the surrounding waters support. Such impacts warrant careful and thorough consideration to ensure the protection of these important ecological assets.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically focused on the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are typically prepared in circumstances where an adverse effect on the integrity of a protected site cannot be ruled out. Their submission represents a notable aspect of the application, demonstrating that the applicant acknowledges the potential for such impacts.

By providing these materials, the applicant indicates an awareness that the Scottish Ministers may ultimately reach a different conclusion regarding the presence or absence of adverse effects on the protected site’s integrity. This cautious approach reflects an understanding of the sensitivity of the designated area and the importance of addressing possible ecological consequences in a structured manner.

In submitting these derogation and compensation documents, the applicant seeks to ensure that, should any adverse impacts be identified, appropriate measures can be considered to mitigate harm to the guillemot population. This approach aligns with the regulatory framework governing protected sites, whereby derogations and compensatory provisions are necessary components when potential effects cannot be excluded at the outset.

Consent for developments impacting protected habitats and species can only be lawfully granted if it is conclusively demonstrated that the proposal will not adversely affect the integrity of the designated site. This requirement means that no reasonable scientific doubt can remain regarding potential harm. The practical consequence is that any application must meet a very high evidential standard before consent is issued.

This strict legal framework is set out under the Habitats Regulations, which stipulate that consent is conditional upon either an absence of adverse effect or the fulfillment of stringent derogation tests. The responsibility for proving compliance rests firmly with the applicant. Importantly, proposals for mitigation, compensation, or future monitoring alone do not satisfy the statutory tests required for lawful consent.

In addition to the Habitats Regulations, this framework is supported by relevant provisions in GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. Together, these policies reinforce the necessity for rigorous scientific evidence and legal compliance in decision-making processes affecting protected sites.

The practical consequence of the applicant’s failure to meet the statutory tests is that the proposed development risks causing harm to internationally important habitats and species, thereby undermining the legal basis for granting consent. Without clear evidence that these protections can be assured, there is a tangible threat to the integrity of designated ecological features.

The evidence submitted, including the applicant’s own derogation documents, reveals a significant degree of uncertainty regarding the ability to satisfy the statutory requirements. This uncertainty indicates that the necessary safeguards for these internationally important ecological assets have not been adequately demonstrated or guaranteed by the applicant.

Given this lack of demonstrable compliance with the legal protections in place, the application cannot be considered to meet the necessary statutory tests. Consequently, granting consent in these circumstances would be contrary to the obligations to protect internationally important habitats and species, and therefore should be refused.

1.1.826 Cumulative and In-Combination Effects

The current assessment approach is fundamentally flawed because it fragments the project by deferring critical elements, thereby preventing a comprehensive evaluation of its overall impacts. Only part of the project—the wind farm itself—is before the Scottish Ministers, while essential components such as the export cable corridor and onshore transmission works, without which the wind farm cannot operate, are reserved for later applications. This segmentation means that the effects of the entire project are never assessed collectively. Consequently, important elements are left to be considered through subsequent consenting processes after the principal decision has been made. Such an approach contravenes the legal principle established in Raeshaw Farms, which requires that a project be assessed as a whole rather than being "salami-sliced" into parts whose individual effects may appear smaller. This fragmented assessment undermines the integrity of the planning process and the ability to fully understand and mitigate the project's cumulative impacts.

The proposed cumulative impact assessment fails to provide a reliable evaluation, as it relies on baseline assessments that understate the true effects. Specifically, the Environmental Impact Assessment’s underlying evaluations of landscape, heritage, and socio-economic factors have already minimized the extent of adverse impacts.

Consequently, the cumulative assessment, which is based on these same understated baselines, inevitably underestimates the combined effects of this development alongside other existing, consented, and foreseeable projects. This systemic flaw compromises the accuracy of the overall cumulative impact conclusions, rendering them insufficient for informed decision-making.

The applicant has failed to demonstrate that the cumulative and in-combination effects of the proposal, including the full scope of the project, have been reliably identified and assessed. This shortcoming is particularly significant given the potential for deferred works to contribute additional environmental impacts that remain unquantified and unconsidered. Such omission undermines the integrity of the environmental impact assessment and obscures the true scale of potential harm.

This failure constitutes non-compliance with established planning policies and regulatory frameworks, specifically engaging GEN 21 and paragraph 4.85 of the National Marine Plan, as well as NPF4 Policy 11(e). Furthermore, it contravenes the requirements of the Environmental Impact Assessment Regulations concerning project splitting, which mandate a comprehensive and integrated assessment of all components of a development to prevent piecemeal consideration that might understate cumulative effects.

In light of these concerns, it is imperative that the decision-making process explicitly addresses the treatment of deferred works to ensure a complete and transparent evaluation. Without this, there remains a material risk that significant environmental effects will be overlooked, justifying refusal of consent until such deficiencies are rectified.

1.1.827 Public Engagement, Site Selection and Environmental Information

While the applicant requests that Scottish Ministers place significant weight on the site-selection process, it is essential to consider the shortcomings in public participation that undermine its legitimacy. The consultation period coincided with the busiest months for island communities, when residents are occupied with continuous work throughout the visitor season and access to specialist advice is limited. This timing contrasts sharply with the applicant’s extended preparation period, which has benefited from substantial professional and financial resources. Consequently, the affected communities have not been afforded a comparable opportunity to engage meaningfully with the extensive technical material submitted, which runs to many thousands of pages.

The principles enshrined in GEN 18 of the National Marine Plan, alongside those of the Aarhus Convention, explicitly require that affected parties have a realistic chance to participate in decisions of this significance. The conditions under which communities have been expected to respond clearly fall short of this standard. It is therefore imperative that Ministers take these deficiencies in public participation seriously when considering the representations made, recognising that the consultation process as conducted does not meet the required standards of effective engagement.

The practical consequence of the inadequacy of the Environmental Impact Assessment (EIA) submitted with this application is that the Scottish Ministers are unable to make an informed and lawful decision. The EIA is the principal evidential basis for determination, and its sufficiency, rather than its extent, is the critical issue. The application acknowledges potential pathways to significant environmental effects but fails to investigate these thoroughly or relies on assessment methodologies that do not substantiate the conclusions presented. For example, the landscape assessment produces outcomes based on a distance-related pattern that is not supported by the methodology outlined in the report itself; the heritage assessment fails to demonstrate the application of its own integrity test; and the socio-economic assessment lacks any place-based analysis of the islands that would be affected.

Furthermore, the application's reliance on future assessments, post-consent plans, ongoing monitoring, and additional approvals is inconsistent with the requirements of the EIA Regulations. These regulations mandate that all likely significant effects must be properly understood and assessed before any determination is made. The approach taken by the applicant, which defers key elements of environmental assessment and mitigation to later stages, does not satisfy this fundamental regulatory requirement and leaves the decision-making process inadequately informed.

In light of these considerations, it is clear that the environmental information provided is insufficient for the Scottish Ministers to discharge their duty effectively. The applicant has not demonstrated that the evidence submitted meets the necessary standards to enable a proper evaluation of the potential significant effects of the proposal. Therefore, the application should not be granted consent until a comprehensive and robust EIA, compliant with statutory obligations, is provided.

1.1.828 Effects on Local Area

The proposed development encompasses a substantial 448 square kilometre area situated immediately north-west of Islay and west of Colonsay, placing these islands in closest proximity to the project site. Despite this, the applicant's assessment inadequately addresses the direct and significant effects on Islay's Atlantic-facing communities, which confront the nearest edge of the development area. Rather than evaluating Islay as an affected island community in its own right, the application primarily considers it only in terms of its potential role as a direct project location, thereby neglecting any place-based analysis of impacts on local setting, economy, or community life.

Similarly, the assessment underestimates the effects on Colonsay and Oronsay, where the seaward outlook integral to daily life faces the array directly. The North Colonsay and Western Cliffs Special Protection Area, which constitutes Colonsay's own coastline, is the subject of the applicant's derogation case and compensation plan, implicitly acknowledging that harm to the internationally protected seabird population cannot be ruled out. Moreover, Oronsay Priory, a scheduled monument of national importance within this community's area, suffers from the same gaps identified in the heritage assessment, particularly concerning the treatment of its open maritime setting. Together, these omissions undermine the reliability of the environmental and heritage impact evaluation submitted.

The applicant's Coastal Character assessment recognises the Sound of Iona as an area of high sensitivity, noting its direct orientation towards the proposed development, extensive visibility, and a large geographical extent of change. The assessment identifies effects on the ferry crossing between Fionnphort and Iona, with an overall effect described as moderate and significant across approximately 21 kilometres, where turbines would span around 39 degrees of the horizon. Similarly, the West Coast of Iona is acknowledged as highly sensitive with widespread visibility, and the applicant concedes significant effects upon residents and visitors throughout much of the island, including at Dùn Ì, Iona's highest point.

However, the applicant's evaluation appears to underestimate the scale and significance of these impacts, particularly regarding the island's internationally important monastic heritage. The baseline acknowledges the significance of pilgrimage, arrival by sea, and movement through the landscape, yet Historic Environment Scotland's request for additional viewpoints—including from the ferry crossing—has not been fully addressed. Notably, no visualisation has been provided from elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, a key vantage point integral to appreciating the heritage context.

Community concerns further underscore the inadequacy of the assessment. A household consultation revealed that 92 per cent of respondents on Iona object to the proposal, yet the applicant's own consultants identified habitability as a potential pathway of effect without subsequently undertaking an assessment of this impact. The scale of the turbines is also understated; for instance, Ben Hynish on Tiree—141 metres high and visible from Iona at approximately 33 kilometres—would be surpassed in height by the largest turbines by about 194 metres, despite the turbines being located at roughly two-thirds of that distance.

In summary, while the applicant recognises certain significant effects on Iona, the overall evaluation falls short in fully capturing the extent and depth of visual, community, and heritage impacts. This underestimation compromises the accuracy and reliability of the environmental and social impact appraisal for the island.

The applicant's assessment fails to fully recognise the practical consequences for Mull and the Ross of Mull coastal communities, particularly those reliant on tourism. Fionnphort, as the gateway to Iona and the embarkation point for visitors, is acknowledged to experience significant effects. However, beyond this, the communities whose livelihoods depend heavily on the flow of visitors and the integrity of the local seascape receive insufficient consideration, leaving a critical gap in understanding the development's economic and social impacts.

In terms of landscape and visual effects, the applicant concedes significant impacts on Core Paths and within the Central, South, and West Mull Local Landscape Areas. The Loch na Keal National Scenic Area, noted for its high sensitivity along 21 to 33 kilometres of coastline, is assessed only at a medium magnitude of effect. Similarly, the Ross of Mull South coastal area, despite its high sensitivity at 22 to 24 kilometres and the acceptance of significant effects at key locations such as Erraid, is downplayed by the attribution of only medium magnitude impacts. This approach underestimates the significance of changes to these designated landscapes, which are central to the character and attraction of the area.

The assessment's reliance on distance-based reasoning, particularly in the treatment of the Wilderness and Gribun Rocks coastal area where viewing distances exceed 30 kilometres, further diminishes the perceived scale of change. This overlooks the fact that Mull's west-facing tourism economy, including wildlife boat operations and accommodation providers, depends fundamentally on the unspoiled Atlantic seascape which this development would industrialise. Crucially, no place-based assessments have been conducted for these communities, resulting in an incomplete evaluation that neglects the true extent of visual, economic, and community impacts.

The applicant's assessment acknowledges the potential for effects on several designated landscapes but appears to underestimate their significance, particularly when compared to mitigation standards typically expected for such sensitive areas. For example, although NatureScot recommended assessing effects on National Scenic Area qualities up to approximately 30 kilometres, the applicant limits its consideration beyond this threshold, concluding that impacts on Staffa—one of Europe's most celebrated small islands located some 35 kilometres from the development—would be minor and not significant. This conclusion is drawn despite an acceptance within the assessment of Staffa's extensive panoramic maritime qualities, which contribute substantially to its natural character.

Similarly, the Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed at a high sensitivity level but attributed only a medium to low magnitude of impact due to perceived distance, scale, and retained landforms. The Scarba, Lunga and the Garvellachs National Scenic Area, situated approximately 35 to 40 kilometres from the development, receives a comparable evaluation. Such moderate impact ratings may not fully reflect the intrinsic qualities that underpin these designations, particularly their remoteness and rugged seascape which are integral to their value.

Moreover, the assessment wholly omits consideration of Ulva, a community-owned island within the Loch na Keal National Scenic Area, which shares the same seascape sensitivities. Ulva is in the early stages of community regeneration and relies heavily on the preservation of its setting and unspoilt seascape for its recovery. The lack of any specific assessment on Ulva's unique circumstances represents a significant gap, undermining the comprehensive protection of vulnerable island communities and the natural and cultural qualities of the wider seaboard designated landscapes.

The applicant's assessment assigns a Low magnitude of change to the South Tiree coastal area despite its High sensitivity, a conclusion that warrants careful scrutiny. When compared to mitigation approaches in similar contexts, such a Low magnitude classification appears incongruous given the distinctive characteristics of Tiree's landscape. The island's topography is exceptionally flat, with its highest elevation, Ben Hynish, reaching only 141 metres. This means that the landscape's defining features are the expansive sea and sky, which together create an open and unobstructed oceanic horizon. Introducing turbines reaching heights of up to 335 metres would impose vertical elements that are without precedent in this seascape, fundamentally altering the visual and experiential qualities of the area. The apparent

minimisation of these effects contradicts the sensitivity acknowledged and is inconsistent with mitigation standards applied in comparable sensitive environments.

Furthermore, the Low magnitude conclusion fails to capture the true scale of change and impact on Tiree's sensitive and distinctive landscape character. Given the island's unique reliance on uninterrupted oceanic views and the absence of existing tall structures, the presence of turbines over twice the height of the highest natural point would be visually dominant and intrusive. This significant discordance between the landscape's character and the proposed development's scale demonstrates that the assessment understates the magnitude of change, leading to an unreliable evaluation of effects. Consequently, the impact on Tiree's landscape has been insufficiently recognised, and this underestimation undermines confidence in the assessment's conclusions.

The applicant's assessment notably omits consideration of significant effects on mainland and island communities that have direct visual and economic connections to the seascape in question. Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by residents, faces the development waters from the east. Despite its finely balanced community and economy, the potential impacts on Gigha have not been examined. Similarly, Ardnamurchan Point, the most westerly point of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas represent precisely the type of receptors that are subject to undue distance-based moderation within the applicant's assessment, thereby undervaluing their sensitivity. Additionally, the west coast of Kintyre comprises a chain of communities whose outlook, character, and visitor economy are intrinsically linked to the open Atlantic seaboard facing Islay, Jura, and the surrounding waters. The Treshnish Isles and other small islands and mainland coasts with views towards the development area share this same reliance and exposure. The failure to address the effects on these communities compromises the comprehensiveness and robustness of the applicant's environmental and socio-economic evaluation, raising concerns over the completeness of the submitted evidence.

The environmental impact assessment systematically underestimates the significance of effects on sensitive receptors located beyond approximately 20 kilometres from the development site. This finding arises from a consistent pattern in the applicant's methodology, where the magnitude of change experienced by these receptors is moderated and their effects discounted. Such an approach inherently diminishes the recognised sensitivity and importance of distant communities.

Crucially, this distance-based moderation results in the omission of any place-based assessment for the communities affected beyond this threshold. As a consequence, the lived experiences and concerns of these populations remain unaddressed within the assessment framework. This absence undermines the comprehensiveness and integrity of the environmental evaluation, which ought to fully account for all significant effects regardless of geographic distance.

In conclusion, reliance on an arbitrary 20-kilometre cut-off to moderate effects cannot be justified where highly sensitive receptors exist beyond this range. A thorough and

place-specific assessment is essential to ensure that all significant impacts are appropriately identified and mitigated. Without such rigor, the assessment fails to meet the necessary standards of environmental scrutiny and public accountability.

1.1.829 Summary

The proposal for the MachairWind Offshore Wind Farm fails to meet the necessary statutory and policy requirements for approval. The applicant's own evaluation acknowledges considerable impacts on nationally designated landscapes, as well as on local communities and cultural heritage along this coastal region. Furthermore, published critiques of the applicant's documentation reveal that the extent of these impacts has been underestimated. Crucially, the essential heritage assessment has not been completed, and although the effects on the island communities impacted by the development were identified, no formal assessment of these impacts was undertaken. In addition, the ecological criteria mandated for such a project have not been demonstrated as achievable. It should also be noted that the application before the Scottish Ministers encompasses only a portion of the entire project.

Given these substantial shortcomings, it is respectfully submitted that the Scottish Ministers should refuse both consent for the MachairWind Offshore Wind Farm and the related marine licence. Should the Ministers be inclined not to refuse outright, it is requested that they require the provision of further environmental information and enhanced visual representations of the proposal. Moreover, determination of the applications should be deferred until after a public inquiry, which would allow thorough examination of the concerns raised in this objection. Regardless of the final decision, it is further requested that the Ministers explicitly address and record their conclusions on the project's impacts upon cultural heritage and the affected island communities within their formal reasons.

Yours faithfully,

[Redacted]

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

Member of the public 588
Dear Sir/Madam,

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

The project in question envisages the development of an offshore wind farm with a generating capacity of approximately 2 gigawatts. This would involve the installation of between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip. The proposed site encompasses a Windfarm Development Area of around 448 square kilometres, situated to the north-west of Islay and west of Colonsay. It lies approximately 21 kilometres from Iona and is in close proximity to the islands and coastal communities of the southern Hebrides.

The forthcoming sections detail the planning and environmental grounds for objection, framed within the statutory and policy context that governs the determination of these applications. It is imperative to emphasise that the onus lies entirely with the applicant to provide compelling and sufficient evidence that all relevant statutory tests and policy criteria are met. Objectors are not required to substantiate contrary claims. Upon examination of the evidence submitted, it is clear that the applicant has failed to meet this evidential burden. Consequently, I contend that consent for the proposed development should be refused.

1.1.830 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989, which require the applicant to have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. The evidence confirms that the applicant has not adequately addressed these requirements, nor has it taken reasonable steps to mitigate adverse effects arising from the proposal on these protected interests. Furthermore, the Scottish Ministers, in determining this application, are mandated to have regard to these same statutory duties. The absence of demonstrated compliance and the presence of deficiencies and omissions in the application’s consideration of these duties weigh decisively against the granting of consent.

The marine licence application is subject to determination under Part 4 of the Marine (Scotland) Act 2010, which mandates that authorisation decisions must be made in accordance with Scotland’s National Marine Plan unless relevant considerations indicate otherwise. The National Marine Plan’s General Policies of particular relevance to this proposal include GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and

National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts). Compliance with these policies is an integral part of the statutory assessment of the application.

The evidence before the determining authority does not demonstrate compliance with these statutory requirements and relevant policies. Specifically, the application fails to provide sufficient evidence to satisfy the requirements of GEN 19 regarding sound evidence, and there are identified deficiencies and omissions in addressing cumulative impacts as required by GEN 21. Furthermore, the application does not adequately engage with the historic environment policies GEN 6 and GEN 7, nor does it properly address considerations related to natural heritage under GEN 9. The absence of demonstrated compliance with these policies constitutes a failure to meet the statutory framework established by the Marine (Scotland) Act 2010 and the National Marine Plan.

Given these deficiencies, omissions, and conflicts with the applicable legal and policy framework, the application does not meet the necessary statutory criteria. As such, these matters weigh decisively against the granting of consent for the marine licence.

This proposal fails to demonstrate compliance with the mitigation requirements set out in National Planning Framework 4 (NPF4), specifically in relation to biodiversity, natural places, historic assets, and energy policies. NPF4 is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. The proposal engages Policies 3, 4, 7, and 11 of NPF4, which address biodiversity, natural places, historic assets and places, and energy respectively.

The submitted evidence does not establish that the proposal meets the standards or obligations of these policies. There are clear deficiencies and omissions in demonstrating how biodiversity will be protected or enhanced, how natural places will be conserved, how historic assets and places will be safeguarded, and how energy considerations will be appropriately addressed. These failures amount to conflicts with the applicable legal and policy framework.

Given that compliance with these key policies has not been demonstrated, and the evidence identifies substantive shortcomings, the proposal is contrary to the requirements of NPF4. As such, these matters weigh decisively against the granting of planning consent.

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

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

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

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

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

Furthermore, where compliance with the Islands (Scotland) Act 2018 has not been demonstrated, or where the evidence identifies deficiencies, omissions, or conflicts with the applicable legal and policy framework, these matters must weigh against the granting of consent. In this case, the failure to properly consider and weigh the interests of island communities constitutes a significant procedural and substantive omission. Consequently, the proposal is in conflict with the statutory requirements and should be refused on this basis.

The applicant bears the responsibility of demonstrating, through robust, objective and proportionate evidence, that every relevant statutory duty, planning policy and environmental assessment requirement has been satisfied. This evidential burden is fundamental to the proper determination of the application and ensures that all legal and policy frameworks are fully complied with before consent is granted.

In this case, the applicant has failed to meet this burden. Where compliance has not been demonstrated, or where the evidence identifies deficiencies, omissions or conflicts with the applicable legal and policy framework, those matters weigh against the granting of consent. Given the absence of conclusive evidence proving adherence to all statutory duties and planning policies, the application should be

refused on the basis that the applicant has not fulfilled the necessary legal and policy requirements.

1.1.831 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to comply with the impact criteria set out in NPF4 Policy 11, thereby undermining the policy's support for renewable energy development. While Policy 11 endorses renewable energy, this support is conditional upon adherence to specific impact tests, including those concerning communities and the natural and cultural environment as detailed in Policy 11(c), (d), and (e). The submitted evidence demonstrates that the proposal would result in significant adverse effects on nationally designated landscapes and seascapes, contravening the protections envisaged by the policy. Furthermore, there is no satisfactory demonstration that the cultural significance of scheduled monuments and their settings would be preserved, nor that the interests of island communities would be adequately safeguarded. Additionally, the ecological assessments required by the policy have not been substantiated by the evidence provided. In summary, the proposal's failure to meet these critical impact criteria means it cannot be supported under NPF4 Policy 11.

There remains significant uncertainty as to whether the proposal complies with the array of National Planning Framework 4 policies designed to protect nationally important assets. Policy 11 operates in conjunction with Policy 4(c) and 4(d), which safeguard National Scenic Areas and nationally important landscapes from significant adverse impacts to their designated qualities. Additionally, Policy 7, including subsection 7(h) concerning scheduled monuments and subsections 7(c) and 7(d) on the settings of historic assets, imposes stringent protections. Policy 3 further requires careful consideration of biodiversity. The evidence demonstrates that the proposal would cause significant adverse effects on nationally designated landscapes and seascapes, undermining their integrity. Moreover, it has not been sufficiently shown that the cultural significance of scheduled monuments and their settings would be preserved. The protection of island communities has also not been assured, nor have the ecological requirements been met on the evidence presented. In light of these unresolved conflicts with multiple relevant policies, the proposal fails to meet the necessary standards for safeguarding these designated assets.

1.1.832 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. Additionally, wireline drawings included within the same panoramic projections are subject to the same constraints as the accompanying photography. Rather than serving as an independent corrective, these wireline drawings represent a technical rendering embedded within the overall visualisation.

Consequently, the assessment based on these materials must be understood in the context of their technical and perceptual constraints. The inability of printed visuals to convey accurate scale and the dependency of wireline drawings on the underlying photography underscore that these visualisations provide an approximation rather

than a definitive representation of the visual impact. This limitation should inform the weight attributed to the visual evidence when considering the proposal's effects on the surrounding environment.

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

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

1.1.833 Cultural Landscape, Archaeology and Historic Environment

While the applicant's assessment adopts Historic Environment Scotland's recognised methodology for evaluating effects on the setting of historic assets, this adherence is superficial and undermines the reliability of its conclusions regarding heritage impacts. The methodology, developed through consultation with Historic Environment Scotland, rightly emphasises that changes to setting must be evaluated in terms of their effect on the contribution setting makes to the cultural significance of heritage assets, and crucially, whether the integrity of that setting is retained. It explicitly clarifies that visual change alone should not be equated directly with adverse impact. However, a Methodological Audit prepared independently, using only the applicant's Appendix 14.3, reveals a fundamental deficiency: although the assessment identifies relevant heritage attributes and describes visual changes—such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—it fails to demonstrate the required evaluative step. Specifically, it does not show how the integrity of setting has been assessed against the applicant's own accepted methodology. Instead, it offers a concluding statement that the integrity of setting is adequately retained without the necessary analysis to support this judgment. This omission calls into question the robustness and credibility of the heritage impact conclusions presented by the applicant.

The applicant's assessment risks underrepresenting the full extent of heritage impacts by not adequately capturing the broader cultural landscape and experiential qualities that define the significance of the affected assets. These assets derive their value not merely from isolated features but from a complex interplay of pilgrimage traditions, arrival by sea, dynamic movement through a living cultural environment, and the relationships between monuments, spirituality, and the encompassing landscape and seascape. Such qualities are inherently experienced through movement rather than from static viewpoints, which the current assessment framework insufficiently addresses.

Historic Environment Scotland, as recorded in the consultation responses within the application, highlighted this deficiency by requesting additional viewpoints to ensure these wider cultural and experiential qualities are properly represented. Their position underscores that a more comprehensive approach is necessary to reflect the heritage assets' significance accurately, beyond conventional fixed visual assessments. Without incorporating these perspectives, the evaluation may fail to recognise the full depth of cultural importance, potentially leading to inadequate mitigation or protection measures.

It is therefore essential that the assessment methodology be revised to include these wider experiential and landscape relationships, ensuring that heritage impacts are thoroughly and appropriately understood. Only by acknowledging and incorporating the living cultural landscape and the movement-based experience of these assets can decision-makers be confident that heritage considerations are fully integrated into planning decisions.

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

The application engages NPF4 Policy 7(h) concerning scheduled monuments, alongside Policies 7(c) and 7(d) relating to the setting of heritage assets, as well as GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. These policies collectively establish a robust framework for the protection of cultural heritage, emphasising the need to safeguard the significance and context of internationally and nationally important heritage assets.

However, the applicant has not provided evidence demonstrating that the cultural significance of these heritage assets and their settings will be adequately protected. Crucially, the Scottish Ministers do not have before them the necessary assessment that would support such a conclusion. This omission indicates a failure to meet key policy requirements, thereby undermining the acceptability of the application in respect of heritage asset protection.

1.1.834 Effects on Island Communities, Tourism and the Local Economy

The practical consequence of the applicant's flawed socio-economic assessment methodology is a significant risk that the specific impacts on island communities will be misunderstood and inadequately mitigated. The applicant's consultants themselves identified habitability as a potentially significant pathway for effects on these communities, yet no targeted assessment of island habitability was conducted. Instead, the socio-economic evaluation in Chapter 18 focuses on regional-level analysis, detailed only for port communities, and fails to provide an equivalent place-based assessment for the islands directly facing the proposed development. Despite this omission, the assessment concludes that island communities exhibit low sensitivity to tourism effects, a conclusion unsupported by detailed evidence.

It is important to recognise that small island economies cannot be accurately represented by regional averages. Their economic structures are heavily concentrated in sectors most vulnerable to fluctuations in the qualities that attract visitors. Far from reducing sensitivity, reliance on increasing visitor numbers amplifies dependence on these critical qualities, which are precisely those at risk from the proposed development. Therefore, any assertion of low sensitivity to tourism impacts, made without detailed, place-specific analysis, constitutes an unsubstantiated assumption rather than a reasoned conclusion.

Given these shortcomings, the socio-economic assessment fails to provide a robust basis for understanding or addressing the specific vulnerabilities of island communities. Without proper, place-based analysis, the potential socio-economic consequences for these communities remain unclear and inadequately accounted for within the planning process. Accordingly, the application should be reconsidered to ensure that the assessment methodology appropriately reflects the unique sensitivities of island economies and supports effective mitigation strategies.

The proposal fails to meet the required standards for assessing and protecting island communities, as mandated by GEN 19 and paragraph 4.81 of the National Marine Plan, which necessitate decisions to be grounded in robust socio-economic evidence and to adopt a precautionary approach when such evidence is lacking. Additionally, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 impose a clear obligation to assess and give due weight to the interests of island communities through meaningful engagement from the outset to the conclusion of the decision-making process.

Despite recognising the need for particular scrutiny of island communities, the applicant has not undertaken the necessary assessments to understand the potential effects of the proposal on these communities. The absence of such critical analysis means that the proposal’s compatibility with sustainable island communities remains unsubstantiated. Consequently, the statutory duties owed to these communities have not been fulfilled or demonstrably discharged.

In conclusion, the proposal does not comply with the relevant planning policies or statutory requirements aimed at safeguarding island communities. Given this fundamental shortcoming, it is clear that the proposal cannot be supported as it stands, and it should be refused to ensure that the statutory and policy protections for island communities are upheld.

1.1.835 Ecology, Biodiversity and Habitats Regulations

The proposed development would bring extensive construction, operational, and decommissioning activities into an ecologically sensitive marine environment over several decades. This large-scale intervention risks causing significant adverse effects due to the disturbance and potential damage to Priority Marine Features and Annex I habitats situated within the development area itself.

Moreover, the surrounding waters serve as important habitats for various protected species, including seabirds, marine mammals, and basking sharks. The presence of

these species underscores the ecological value and vulnerability of the site, necessitating careful consideration of any impact arising from the project.

Given the established ecological importance and sensitivity of the location, it is imperative that any proposals fully account for the potential environmental consequences. Adequate safeguards and mitigation measures must be incorporated to prevent unacceptable harm to these priority habitats and protected species throughout the lifespan of the development.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically focused on the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are typically prepared in circumstances where an adverse effect on the integrity of a protected site cannot be ruled out. Their submission represents a notable aspect of the application, demonstrating that the applicant acknowledges the potential for such impacts.

By providing these materials, the applicant indicates an awareness that the Scottish Ministers may ultimately reach a different conclusion regarding the presence or absence of adverse effects on the protected site's integrity. This cautious approach reflects an understanding of the sensitivity of the designated area and the importance of addressing possible ecological consequences in a structured manner.

In submitting these derogation and compensation documents, the applicant seeks to ensure that, should any adverse impacts be identified, appropriate measures can be considered to mitigate harm to the guillemot population. This approach aligns with the regulatory framework governing protected sites, whereby derogations and compensatory provisions are necessary components when potential effects cannot be excluded at the outset.

Mitigation, compensation proposals, and future monitoring plans, while important components of development management, do not in themselves satisfy the stringent legal requirements for consent under the Habitats Regulations. The competent authority must be assured, beyond reasonable scientific doubt, that the proposal will not adversely affect the integrity of the protected site. This high evidential standard ensures that any potential harm is thoroughly assessed and ruled out before consent can be granted.

The legal framework governing these assessments is clear and exacting. Consent may only be lawfully granted if the strict derogation tests are met, placing the burden of proof firmly on the applicant. This means that developers must provide compelling, conclusive evidence that their proposals will not compromise protected habitats or species. Mere reliance on proposed mitigation or compensation measures does not discharge this burden, as these measures alone cannot guarantee the absence of adverse effects.

This rigorous approach is reflected in the integration of the Habitats Regulations with national planning policies, including GEN 9 and GEN 13 of the National Marine Plan and Policies 3, 4(b), 4(e), and 4(f) of NPF4. Together, these set a clear policy context that underlines the necessity for precise, evidence-based assessments,

ensuring that environmental protection remains paramount in decision-making processes.

The applicant's submitted evidence, notably their own derogation documents, reveals a significant shortfall in demonstrating compliance with the statutory tests designed to protect internationally important habitats and species. The degree of certainty provided is insufficient to satisfy these legal requirements, as acknowledged within the applicant's documentation itself. This failure directly undermines the fundamental protections afforded to such ecological features under the relevant statutory framework.

Given the applicant's inability to meet these critical legal standards, the application cannot be considered compliant with the statutory safeguards intended to preserve internationally important ecological assets. Consequently, the case for granting consent is fundamentally weakened, as the necessary assurances for environmental protection remain unsubstantiated. It is therefore appropriate to conclude that consent should not be granted in the absence of clear demonstration that these statutory tests have been satisfied.

1.1.836 Cumulative and In-Combination Effects

The applicant's evidence clearly establishes that only a portion of the overall development is currently before the Scottish Ministers for consideration. Specifically, the export cable corridor and the onshore transmission works, which are integral components without which the wind farm cannot function, have been deliberately deferred to subsequent applications. This segmentation means that the cumulative effects of the entire project are never assessed concurrently, with critical elements subjected to separate consenting processes following the primary decision. Such an approach is fundamentally flawed, as it undermines the ability of decision-makers to fully comprehend the full scope and impact of the development at the time of determination.

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

The cumulative impact assessment relies directly on the findings of the underlying Environmental Impact Assessment, including the landscape, heritage, and socio-economic evaluations. As these foundational assessments have been demonstrated to understate the effects, the cumulative assessment consequently adopts this diminished baseline. This results in an overall underestimation of the combined impacts arising from the proposed development in conjunction with other existing,

consented, and foreseeable projects. Therefore, the cumulative effects reported cannot be considered reliable or reflective of the true extent of impact.

The applicant's submission fails to meet the requirements set out in GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the Environmental Impact Assessment (EIA) Regulations regarding project splitting and the assessment of cumulative effects. Unlike a comprehensive assessment approach, which would integrate all elements of a project to fully appraise environmental impacts, the current proposal does not adequately consider the combined and in-combination effects of the development. This omission undermines the ability to evaluate the overall environmental consequences accurately and limits the effectiveness of any proposed mitigation measures.

Furthermore, the applicant has not explicitly addressed the implications of deferred works within the project scope, which is a critical factor in understanding the full extent of environmental impacts. The decision-making process requires clear and transparent consideration of these deferred elements to ensure compliance with relevant policies and regulations. Without this explicit treatment, there is a significant risk that the cumulative impacts remain underestimated, leading to an incomplete assessment that could result in adverse environmental consequences going unmitigated. It is therefore requested that the deferred works be expressly addressed and integrated within the determination to uphold policy compliance and environmental protection standards.

1.1.837 Public Engagement, Site Selection and Environmental Information

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

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

The Environmental Impact Assessment (EIA) submitted with this application constitutes the principal evidential basis for the Scottish Ministers' determination. However, the issue is not the extent of the assessment but its sufficiency. The application identifies potential pathways to significant environmental effects but fails

to investigate them adequately or employs methodologies that do not substantiate the conclusions presented. For example, the landscape assessment's results reflect a distance-based pattern not supported by its own stated methodology; the heritage assessment does not evidence the application of its integrity test; and the socio-economic assessment lacks place-based analysis pertinent to the affected islands. Such deficiencies undermine the reliability of the environmental information provided.

Furthermore, the application relies on future assessments, post-consent plans, monitoring regimes, and additional approvals to address outstanding environmental matters. This approach conflicts with the requirements of the EIA Regulations, which mandate that likely significant effects be fully understood prior to determination. Scottish Ministers are obliged to decide based on the evidence currently before them rather than assumptions that unresolved issues will be satisfactorily settled subsequently. The applicant has not demonstrated that the environmental information submitted is adequate to enable an informed decision, rendering the EIA insufficient for the purposes of this application.

1.1.838 Effects on Local Area

The applicant's assessment fails to adequately recognise and address the direct and significant impacts that the proposed development would have on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby undermining the reliability of the overall environmental and heritage impact evaluation. Islay and Colonsay are the nearest inhabited islands to the development site, which extends over a 448 square kilometre area immediately north-west of Islay and west of Colonsay. Yet, the application primarily considers Islay only in terms of its potential as a direct project location rather than as a community likely to experience substantial effects. Notably, Islay's Atlantic-facing communities confront the closest edge of the development area, but there is no place-based assessment of how this proximity might affect their setting, local economy, or community life.

In relation to Colonsay and Oronsay, the seaward outlook, which is integral to daily life and identity, directly faces the proposed array. The North Colonsay and Western Cliffs Special Protection Area, part of Colonsay's own coastline, is central to the applicant's derogation case and compensation plan. This area represents the clearest recognition within the application that harm to an internationally protected seabird population associated with these cliffs cannot be ruled out. Moreover, Oronsay Priory, a scheduled monument of national importance situated within this community, has its open maritime setting insufficiently addressed. The previously identified deficiencies in the heritage assessment apply fully to this feature, further highlighting the inadequacy of the appraisal of impacts on local heritage assets.

Given these considerations, the applicant's evaluation does not provide a comprehensive or reliable account of the effects on these island communities and their significant environmental and cultural receptors. This underassessment risks overlooking adverse consequences that would be materially relevant to planning decisions, and as such, the assessment should be revisited to ensure that the impacts on Islay, Colonsay, and Oronsay are properly and fully accounted for.

The applicant's Coastal Character assessment recognises that the Sound of Iona possesses a high sensitivity to the proposed development, noting its direct orientation towards the site and extensive visibility. The assessment identifies a large geographical extent of change, with effects considered moderate and significant across approximately 21 kilometres. The turbines would span around 39 degrees of the horizon, impacting the ferry crossing between Fionnphort and Iona. Similarly, the west coast of Iona is deemed highly sensitive, with widespread visibility and acknowledged significant effects on residents and visitors throughout much of the island, including at Dùn Ì, the island's highest point.

Iona's monastic landscape, comprising the Abbey, the Nunnery and the high crosses, holds heritage significance of international importance. The applicant's baseline recognises that this significance is intrinsically linked to pilgrimage, arrival by sea, and movement through the landscape. Historic Environment Scotland's request for additional viewpoints, including from the ferry crossing itself, was not fully addressed, as no visualisation was provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn. This omission raises concerns about the completeness of the visual impact assessment on such a culturally sensitive and historically important landscape.

Community response on Iona further underlines the potential for significant adverse effects. A household consultation revealed that 92 per cent of respondents object to the proposal. Moreover, the applicant's own consultants identified habitability as a potential pathway of effect on the community, yet this was never formally assessed. To illustrate the scale of visual impact, the largest turbines would exceed the height of Ben Hynish on Tiree—at 141 metres and visible from Iona at around 33 kilometres—by approximately 194 metres, despite being situated at roughly two-thirds of that distance. Taken together, these factors suggest that the applicant's assessment may underestimate the true scale and significance of visual, community, and heritage impacts on Iona, thereby compromising the accuracy of the environmental and social impact evaluation.

The applicant's assessment acknowledges significant effects on several key locations within Mull and the Ross of Mull coastal communities. Specifically, the Ross of Mull South coastal area is identified as having High sensitivity at distances of approximately 22 to 24 kilometres, with an attributed Medium magnitude of effect. Significant impacts are recognised at Erraid and on the Core Paths of the Ross, while Fionnphort, serving as the gateway to Iona and the principal embarkation point for visitors, is explicitly accepted to experience significant effects. This community is notably reliant on the flow of visitors, highlighting the importance of understanding the development's influence on local dynamics.

Further across Mull, the applicant accepts significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Areas. The Loch na Keal National Scenic Area, which encompasses Mull's western waters and islands, is assessed as having High sensitivity throughout a range of approximately 21 to 33 kilometres. However, the magnitude of impact in this nationally designated landscape is attributed no more than Medium. This suggests a potential underestimation of the development's visual and environmental intrusion within an

area of recognised scenic importance. The applicant's approach appears to downplay the extent of change, especially given the acknowledged sensitivity.

The assessment's treatment of the Wilderness and Gribun Rocks coastal area further exemplifies this concern. Here, the applicant judges the scale of change to be small due to a viewing distance exceeding 30 kilometres. This distance-based reasoning raises questions about the adequacy of the impact evaluation, particularly given that Mull's west-facing tourism economy, wildlife boat operations, and accommodation in western townships are intimately linked to the Atlantic seascape that would be industrialised by the development. Importantly, none of these communities have received a place-based assessment tailored to their specific contexts, which risks overlooking significant economic and social consequences. Taken together, these points suggest that the applicant's assessment does not fully capture the visual, economic, and community impacts on Mull and Ross of Mull, particularly in relation to designated landscapes and tourism-dependent communities.

The applicant's assessment recognises 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 recognises the South Tiree coastal area as having High sensitivity at a distance of approximately 35 kilometres but assigns a Low magnitude of change to the proposed development. This evaluation, however, significantly understates the true magnitude of impact on Tiree's distinctive landscape character. Tiree is an exceptionally low-lying island, with its highest point, Ben Hynish, rising to only 141 metres, and its landscape defined by the expansive dominance of sea and sky. The introduction of turbines up to 335 metres in height would create vertical structures unprecedented within this open oceanic horizon. Such large-scale additions would markedly alter the seascape, contradicting the applicant's conclusion

of Low magnitude change. Given the exposed and sensitive nature of this receptor, the assessment's low magnitude finding is an unreliable evaluation that fails to adequately reflect the substantial and intrusive visual effects on Tiree's unique coastal environment.

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

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

1.1.839 Personal Observations

Based on my own local knowledge, I also wish to highlight that: Iona is a very special island with huge spiritual significance - historically and present day. The land, views from the land, the sea birds, the historic buildings all are part of the spirituality of the place. Any industrialisation around and in sight of Iona will change and destroy its uniqueness as a place of spirituality.

1.1.840 Further Comments

The Islands in this area are world renowned for their individual characteristics, for the different lifestyles, the abundance of wildlife and scenic beauty and "remoteness". A way of life and being that needs to be cherished and protected. In a world that is becoming more and more about greed, profit at all costs it is imperative that Scottish ministers protect the uniquely Scottish 'wilderness'.

1.1.841 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy requirements governing its determination. The applicant's own evaluations acknowledge significant impacts on nationally designated landscapes,

as well as on the coastal communities and their heritage. However, published analyses of the applicant’s documentation reveal that these impacts have been understated. Crucially, the necessary heritage assessment has not been completed, while the effects on the island communities directly affected were identified but never subject to proper evaluation. Furthermore, the ecological criteria required by law have not been demonstrated as achievable. It is also notable that only a portion of the project is currently before the Scottish Ministers for approval.

Given these substantial shortcomings, I urge the Scottish Ministers to refuse both consent for the MachairWind Offshore Wind Farm and the associated marine licence. Should the Ministers consider otherwise, I request that they require the submission of additional environmental information and enhanced visualisations to address the deficiencies identified. Moreover, I propose that the applications be determined only following a public inquiry, which would allow for thorough examination of the issues raised in this objection.

Finally, irrespective of the decision reached, I ask the Ministers to provide clear and explicit conclusions in their reasons regarding the effects on cultural heritage and the impacted island communities. This transparency is essential to ensure that these critical considerations are properly acknowledged in the final determination.

Yours faithfully,

[Redacted]

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

Member of the public 589
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, which are the subject of application 00012385 seeking consent under section 36 of the Electricity Act 1989, alongside application 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. The applicant, MachairWind Limited (ScottishPower Renewables), proposes to develop an offshore wind farm with an installed capacity of approximately 2 GW. This development would consist of between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip, situated within a designated Windfarm Development Area spanning roughly 448 square kilometres. The site lies to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in proximity to the islands and coastal communities of the southern Hebrides.

It is requested that this letter be formally recognised as an objection, that my details be recorded accordingly, and that I receive notification of the final decision in relation to these applications.

The following sections detail the planning and environmental grounds underpinning this objection, framed within the statutory and policy context applicable to the determination of these proposals. It is important to emphasise that the onus lies with the applicant to provide robust and sufficient evidence to satisfy all relevant statutory tests. Objectors bear no legal obligation to disprove the proposals. Upon careful consideration of the evidence submitted, it is clear that the applicant has failed to meet this burden. Consequently, the applications should be refused consent.

1.1.842 Conflict with National Planning Framework 4 and the Development Plan

The proposal under consideration fails to meet the impact criteria set out in NPF4 Policy 11, thereby undermining the policy's intended support for renewable energy development. NPF4 Policy 11 explicitly conditions such support on compliance with specific impact tests, including those addressing effects on communities under Policy 11(c), and impacts on landscape, seascape, and other receptors under Policies 11(d) and 11(e). The proposal's shortcomings in these areas are significant and quantifiable, as it would result in substantial adverse effects on nationally designated landscapes and seascapes. Furthermore, the evidence submitted does not satisfactorily demonstrate that the cultural significance of scheduled monuments and their settings would be preserved, nor does it establish that the interests of island communities would be adequately safeguarded. Additionally, the ecological assessments provided fail to confirm that the necessary environmental protections can be achieved.

These deficiencies collectively indicate a clear conflict with the impact criteria integral to NPF4 Policy 11. The policy's support for renewable energy is contingent upon meeting these criteria, which are designed to balance development with environmental and cultural conservation. Without satisfactory evidence to address these critical concerns, the proposal cannot be said to comply with the policy framework. Consequently, it is appropriate to conclude at this stage that the proposal

does not align with the requirements of NPF4 Policy 11, and therefore should not be supported in its current form.

Policy 11 must be considered alongside other relevant provisions within the National Planning Framework 4, specifically Policy 4(c) and 4(d), which protect National Scenic Areas and nationally important landscapes from significant adverse effects on the qualities for which they are designated. It also operates in conjunction with Policy 7, including Policy 7(h) concerning scheduled monuments and Policies 7(c) and 7(d) relating to the setting of historic assets, as well as Policy 3 on biodiversity. These policies collectively establish a comprehensive framework aimed at safeguarding the natural, cultural, and ecological integrity of nationally important assets.

The proposal, however, fails to comply with these interrelated policies. It would result in significant adverse effects on nationally designated landscapes and seascapes, undermining their protected qualities. Furthermore, there is no demonstrated assurance that the cultural significance of scheduled monuments and their settings will be preserved. The safeguarding of island communities, as required by the relevant policies, has not been evidenced, and the ecological tests set out in Policy 3 have not been shown to be capable of being met based on the submitted evidence. Consequently, the proposal conflicts with multiple policies designed to protect designated assets of national importance and should be considered contrary to the National Planning Framework 4's objectives.

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

1.1.843 Seascape, Landscape and Visual Effects

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

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

kilometres for certain landscape types. This gradation underscores a systematic moderation of impact magnitude correlated with increasing distance.

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

The applicant's submission includes visualisation materials prepared in accordance with NatureScot's established guidance. This guidance recognises that printed visualisations inherently cannot fully replicate the scale and spatial experience perceived by a viewer in the field. Consequently, while these visualisations provide a useful indicative representation, they are subject to inherent technical and perceptual constraints.

Further, the wireline drawings incorporated within the panoramic projections share the same limitations as the accompanying photographic images. These wireline drawings serve as technical renderings within the overall visualisation framework rather than as independent measures to correct or enhance the photographic content. As such, they should be interpreted as complementary rather than definitive visual evidence.

In light of these acknowledged limitations, it is important that decision-makers consider the visualisation materials as indicative aids rather than exact representations. The visual impact assessment must therefore be balanced with on-site observations and other contextual factors to fully understand the proposed development's visual effects.

The proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration of the night-time seascape character throughout its 35-year operational lifespan. This change is not merely a temporary inconvenience; from a policy perspective, granting consent effectively endorses the suitability of this seascape for wind farm use. Consequently, the decision carries significant implications for the intrinsic qualities of the night-time seascape, which must be carefully weighed against the benefits of the development.

There remains significant uncertainty regarding the proposal's compliance with key planning policies designed to safeguard landscape and seascape interests. The applicant has not adequately demonstrated that its assessment of the scale of the accepted effects aligns consistently with its own stated methodology. This inconsistency raises doubts about the reliability of the conclusions presented and undermines confidence in the assessment's findings.

Moreover, the proposal fails to establish compliance with policies protecting nationally important landscapes and seascapes, specifically those set out in NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of

the National Marine Plan. Given this lack of demonstrated conformity, it is evident that the proposal does not meet the requisite policy standards, and accordingly, it should not be supported.

1.1.844 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment does not fully capture the broader cultural landscape and experiential qualities that contribute to the significance of the affected heritage assets. Their own baseline acknowledges that this significance arises from dynamic aspects such as pilgrimage routes, arrival by sea, and movement through a living cultural landscape, as well as the interrelationships between monuments, spirituality, and the surrounding landscape and seascape—elements experienced through movement rather than fixed viewpoints. Historic Environment Scotland's consultation responses, as recorded in the application, further highlight the need for additional viewpoints to ensure these wider cultural qualities are adequately represented.

The application engages National Planning Framework 4 (NPF4) Policy 7(h) concerning scheduled monuments, as well as Policies 7(c) and 7(d) relating to the setting of heritage assets, together with GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. These provisions collectively establish a rigorous framework intended to ensure that the cultural significance of heritage assets, particularly those of international and national importance, and their settings are duly protected in the planning process.

However, the applicant has failed to demonstrate that such protection will be secured. There is a conspicuous absence of a comprehensive assessment to confirm that the cultural significance of these heritage assets and their settings will not be compromised. Consequently, the Scottish Ministers do not have before them the necessary evidence to conclude that the application complies with the relevant heritage protection policies. This deficiency undermines the acceptability of the proposal in terms of its compliance with policy requirements for safeguarding heritage assets.

1.1.845 Effects on Island Communities, Tourism and the Local Economy

The proposal poses a serious threat to the fundamental economic and social sustainability of the island communities concerned. These communities rely to an exceptional degree on visitors, whose arrival is motivated precisely by the qualities identified in the applicant's own baseline assessments: the landscape, seascape, cultural heritage, tranquillity, and remoteness of the area. Any changes to these defining characteristics would directly undermine the economic base of these communities. This economic harm would, in turn, affect essential local services, reduce population retention and growth, and jeopardise the ongoing viability of the communities themselves. In light of these factors, the proposal should be viewed as incompatible with the long-term sustainability of the island communities it would impact.

The proposal fails to demonstrate compliance with key policy and statutory requirements designed to protect island communities, thereby undermining the sustainability of those communities. Specifically, it neglects the obligations set out in

GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions must be founded on robust socio-economic evidence and adopt a precautionary approach when such evidence is insufficient. Moreover, the proposal does not accord with NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, both of which require that the interests of island communities be thoroughly assessed and afforded appropriate weight through meaningful engagement from the earliest stages of the development process through to its conclusion.

Critically, the applicant acknowledged that island communities warrant particular scrutiny; however, no adequate assessment has been undertaken to understand the potential impacts on these communities. The absence of such an assessment means that it has not been demonstrated that the proposal aligns with the principles of sustainable island communities. Consequently, the statutory duties owed to these communities have not been discharged, leaving a significant gap in compliance.

In summary, the failure to provide sound socio-economic evidence, to engage meaningfully with island communities throughout the process, and to meet statutory and policy obligations renders the proposal incompatible with the protection and sustainable development of island communities. This non-compliance fundamentally undermines the proposal's acceptability in planning terms.

1.1.846 Ecology, Biodiversity and Habitats Regulations

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

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

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

There remains significant uncertainty as to whether the application complies with the statutory requirements designed to safeguard internationally important habitats and species. The evidence submitted, notably the applicant's own derogation documents, clearly indicates that the necessary degree of certainty to satisfy these statutory tests has not been achieved. This failure to demonstrate compliance fundamentally undermines the justification for granting consent, as the legal protections for these ecological features must be upheld without compromise. Consequently, in light of this unresolved doubt, the application should not be approved.

1.1.847 Cumulative and In-Combination Effects

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

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

The practical consequence of relying on the cumulative assessments as presented is that the true combined effects of the proposal, alongside other existing, consented, and foreseeable developments, are underestimated. This arises because these cumulative assessments depend directly on conclusions drawn in other parts of the Environmental Impact Assessment. If the baseline assessments for landscape, heritage, and socio-economic factors are understated, as previously outlined, then the cumulative assessment is inherently flawed by starting from this diminished baseline. As a result, the overall impact is not fully captured, calling into question the reliability of the cumulative impact conclusions.

The applicant has failed to demonstrate that the cumulative and in-combination effects of the proposal, including the full scope of the project, have been reliably identified and assessed, contrary to the requirements set out in GEN 21 and paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the EIA Regulations concerning project splitting. This omission undermines the integrity of the environmental impact assessment process and prevents a comprehensive understanding of the potential effects. It is therefore essential that the treatment of the deferred works be explicitly considered and addressed within the determination to ensure compliance with relevant planning policies and regulatory obligations. In conclusion, without this explicit consideration, the proposal does not meet the necessary standards for informed decision-making and should not be approved in its current form.

1.1.848 Public Engagement, Site Selection and Environmental Information

When comparing the consultation process in this case to the standards set by GEN 18 of the National Marine Plan and the principles enshrined in the Aarhus Convention, it is evident that the conditions for public participation were significantly deficient. Those standards require that affected communities are afforded a realistic opportunity to engage meaningfully in decisions of considerable impact. In contrast, the applicant’s consultation period coincided with the busiest months for island residents, who were heavily committed to continuous work throughout the visitor season, limiting their capacity to access specialist advice or fully consider the voluminous technical documentation submitted, which spans many thousands of

pages. Meanwhile, the applicant has benefited from years of preparation, with extensive professional and financial resources, further skewing the participatory balance.

These shortcomings directly undermine the legitimacy of the site-selection process, particularly given the weight that Scottish Ministers are asked to place on it. The deficiencies in public engagement evident at both the plan and site-selection stages have persisted into the application stage, resulting in a process that falls short of the effective participation required by national policy and international obligations. It is therefore incumbent on Ministers to take these factors seriously when considering the representations submitted, recognising that the affected communities were not provided with a fair or practical opportunity to contribute to decisions of this magnitude.

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

1.1.849 Effects on Local Area

The applicant’s assessment significantly underestimates the direct and substantial effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, calling into question the reliability of the overall environmental and heritage impact evaluation. Islay and Colonsay lie immediately adjacent to the proposed development area, which spans 448 square kilometres; yet Islay is primarily considered only as a potential project location rather than as an affected island community in its own right. This approach neglects the Atlantic-facing communities of Islay, which border the development’s closest edge and lack any place-based assessment of impacts on their setting, local economy, or community life. Similarly, Colonsay and Oronsay face the development area directly across their seaward outlook, integral to their daily experience. The North Colonsay and Western Cliffs Special Protection Area, located on Colonsay’s coastline, is the subject of the applicant’s derogation case and compensation plan, implicitly acknowledging that harm to its internationally protected seabird population cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance within this community, suffers from the same shortcomings identified elsewhere in the heritage assessment, particularly in relation to the evaluation of its open maritime setting. Taken together, these deficiencies demonstrate that the assessment fails to

adequately address the significant and direct effects on these island communities and their heritage.

The applicant's assessment of the visual and community impacts on Iona appears to underestimate the scale and significance of these effects when compared with the Coastal Character assessment and known sensitivities of the area. While mitigation measures are proposed, the Coastal Character assessment highlights that the Sound of Iona exhibits high sensitivity, with direct orientation towards the development and extensive visibility. The turbines would extend approximately 39 degrees across the horizon at a distance of around 21 kilometres, producing an overall effect described as Moderate and Significant. This broad geographical extent of change notably includes impacts on the ferry crossing between Fionnphort and Iona, an important community and visitor route, yet the applicant's visualisations do not encompass key viewpoints such as the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, despite Historic Environment Scotland's request for additional perspectives including from the ferry itself.

Furthermore, the West Coast of Iona is similarly assessed as highly sensitive, with widespread visibility of the proposed development. The applicant accepts that significant effects would occur for residents and visitors across much of the island, including at Dùn Ì, the highest point of Iona. The heritage significance of Iona's monastic landscape, encompassing the Abbey, the Nunnery and the high crosses, is internationally recognised and intrinsically linked to pilgrimage, arrival by sea and movement through the landscape. The applicant's baseline acknowledges this, yet the omission of certain visualisations and the limited assessment of experiential impacts call into question the completeness of the heritage impact evaluation. This is particularly important given the cultural and historic prominence of these sites and their relationship to views and approaches across the island.

In addition to these considerations, community response further challenges the adequacy of the assessment. A household consultation revealed that 92 per cent of respondents on Iona object to the proposal, indicating strong local concern. Crucially, the applicant's own consultants identified habitability as a potential pathway of effect on the island's community, yet no assessment of this impact appears to have been undertaken. The scale of the turbines can be contextualised by comparison with Ben Hynish on Tiree, a familiar landmark standing 141 metres tall and visible from Iona at approximately 33 kilometres. The largest turbines would overtop Ben Hynish by around 194 metres while being located at roughly two-thirds of that distance, emphasising their imposing presence. Taken together, these points demonstrate that the applicant's evaluation underestimates the significant visual, community and heritage effects on Iona, thereby compromising the accuracy of the environmental and social impact assessment.

While the applicant acknowledges significant effects on certain locations such as Erraid, Core Paths of the Ross of Mull, and Fionnphort—the latter being the gateway to Iona and a key point for visitor embarkation—the mitigation measures proposed do not fully address the broader and more profound impacts on Mull and Ross of Mull's coastal communities and landscapes. The Ross of Mull South coastal area, assessed as having High sensitivity at distances of approximately 22 to 24 kilometres and attributed only Medium magnitude of impact, exemplifies this

insufficient recognition of harm. Similarly, although the Loch na Keal National Scenic Area is identified as of High sensitivity across a range of 21 to 33 kilometres, the applicant restricts the attributed magnitude to Medium, a conclusion that appears inconsistent with the area's significance.

The applicant's reliance on distance to downplay effects is further illustrated by the assessment of the Wilderness and Gribun Rocks coastal area, where impacts are judged small due to viewing distances exceeding 30 kilometres. This distance-based approach underestimates the visual and experiential intrusion on sensitive landscapes. Crucially, Mull's west-facing tourism economy, including wildlife boat operations and accommodation in western townships, depends on the unspoiled Atlantic seascape that the proposed development would industrialise. None of these communities has been provided with a place-based assessment, leaving a significant gap in understanding the economic and social consequences.

In summary, the applicant's assessment inadequately addresses the significant visual, economic, and community impacts on Mull and Ross of Mull. The reliance on distance to mitigate perceived effects and the absence of detailed, location-specific analysis fail to reflect the true magnitude of harm to designated landscapes and tourism-dependent communities.

The applicant's assessment acknowledges the proximity of Ulva within the Loch na Keal National Scenic Area and recognises the shared effects on that designated landscape. However, it fails to consider the specific circumstances of Ulva as a community-owned island undergoing regeneration. This small, re-establishing community depends fundamentally on the unspoilt qualities of its setting and seascape, yet no dedicated assessment has been made to evaluate the potential impacts on its natural and cultural environment.

Similarly, Staffa, located approximately 35 kilometres from the development area and also within the Loch na Keal National Scenic Area, is dismissed as experiencing only small-scale change with no significant effect. This conclusion is reached despite the island's renowned panoramic maritime qualities, which the applicant's own assessment acknowledges. Notably, this distance exceeds the approximately 30-kilometre threshold recommended by NatureScot for assessing impacts on National Scenic Area qualities, raising concerns about the adequacy of the assessment methodology.

Other designated landscapes such as the Jura National Scenic Area, situated about 28 to 32 kilometres away, are assessed as having High sensitivity but only Medium to Low magnitude of impact, primarily justified by distance and retained landforms. This approach similarly extends to the Scarba, Lunga, and the Garvellachs National Scenic Area at 35 to 40 kilometres. However, these areas' designations rest heavily on their wild and undeveloped Atlantic character, which may be more vulnerable to change than the applicant's assessment suggests. Taken together, these considerations indicate that the potential effects on important seaboard landscapes and island communities may be underestimated, warranting a more thorough and nuanced evaluation.

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

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

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

While the applicant's assessment includes certain mitigation measures aimed at moderating the visual and economic impacts of the proposed development, these measures fall short in adequately addressing the effects experienced by mainland and island communities with direct seascape connections to the site. The reliance on distance-based moderation fails to capture the nuanced and significant influence the development would have on receptors such as Ardnamurchan Point, where panoramic views along the Hebridean seaboard contribute substantially to local tourism. The application's approach thus inadequately accounts for the high-quality seaward panoramas that are central to the visitor experience and economic vitality of the peninsula.

Moreover, the assessment omits a thorough examination of communities on the west coast of Kintyre, whose outlook, character, and visitor economy are intrinsically linked to the open Atlantic seaboard. These communities, alongside the Treshnish Isles and other small islands and mainland coasts facing towards the development, rely heavily on the visual and environmental integrity of these waters. The lack of consideration given to these receptors undermines the comprehensiveness of the assessment and risks overlooking cumulative impacts that may affect the sustainability of local economies and the preservation of community identity.

In addition, the omission of any evaluation of effects on Gigha, a community-owned island that stands as a national symbol of island regeneration, is particularly concerning. Gigha's eastern outlook towards the development area means that its finely balanced community and economy could be materially affected. The failure to include Gigha in the applicant's assessment represents a significant gap, limiting the

understanding of the full range of consequences and thereby weakening the robustness of the environmental appraisal. Consequently, the assessment should be revisited to incorporate these critical receptors to ensure a more comprehensive and equitable evaluation of the proposed development's impacts.

The environmental impact assessment systematically underestimates the significance of effects on sensitive receptors located beyond approximately 20 kilometres from the development site. This finding arises from a consistent pattern in the applicant's methodology, where the magnitude of change experienced by these receptors is moderated and their effects discounted. Such an approach inherently diminishes the recognised sensitivity and importance of distant communities.

Crucially, this distance-based moderation results in the omission of any place-based assessment for the communities affected beyond this threshold. As a consequence, the lived experiences and concerns of these populations remain unaddressed within the assessment framework. This absence undermines the comprehensiveness and integrity of the environmental evaluation, which ought to fully account for all significant effects regardless of geographic distance.

In conclusion, reliance on an arbitrary 20-kilometre cut-off to moderate effects cannot be justified where highly sensitive receptors exist beyond this range. A thorough and place-specific assessment is essential to ensure that all significant impacts are appropriately identified and mitigated. Without such rigor, the assessment fails to meet the necessary standards of environmental scrutiny and public accountability.

1.1.850 Personal Observations

In addition to the planning matters above, I am personally concerned because: I do not live there but am very concerned for the local people and environment; having visited Iona, I cannot imagine this project would benefit either.

Finally, I would also ask the Scottish Ministers to consider: Please listen to the peoples of the Hebrides, who know best what kind of development is appropriate and desirable.

1.1.851 Summary

The proposal for the MachairWind Offshore Wind Farm fails to meet the statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges substantial impacts upon nationally designated landscapes, as well as on the coastal communities and their heritage. However, published analyses of the applicant's documentation reveal that these impacts have been underestimated. Furthermore, the necessary heritage assessment has not been undertaken, and although the effects on the island communities have been identified, they remain unassessed. The ecological criteria set forth have not been demonstrated as achievable, and it is important to note that only a portion of the project is currently under consideration by the Scottish Ministers.

In light of these shortcomings, it is respectfully submitted that the Scottish Ministers should refuse consent for the MachairWind Offshore Wind Farm and decline to grant

the associated marine licence. Should the Ministers consider not refusing the application outright, it is requested that they require the submission of additional environmental information and enhanced visualisations. Moreover, it is urged that the application be decided only subsequent to a public inquiry, thereby allowing a thorough examination of the issues raised in this objection.

Irrespective of the outcome, it is further requested that the Scottish Ministers explicitly address and articulate their conclusions regarding the impacts on cultural heritage and the affected island communities within their decision-making rationale.

Yours faithfully,

[Redacted]

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

Member of the public 590
Dear Sir/Madam,

I hereby submit a formal objection to the proposals for the MachairWind Offshore Wind Farm, relating to application numbers 00012385 and 00012386. These applications seek consent under section 36 of the Electricity Act 1989 and a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010, respectively, and have been put forward by MachairWind Limited, trading as ScottishPower Renewables. I request that this letter be recorded as an official objection, that my status as an objector be acknowledged, and that I receive notification of the final decision regarding these applications.

The project in question entails the development of an offshore wind farm with a generating capacity of approximately 2 gigawatts. This would consist of between 91 and 144 turbines, each with a maximum height of up to 335 metres to blade tip. The proposed site spans a Windfarm Development Area of roughly 448 square kilometres, located in the sea to the north-west of Islay and west of Colonsay. This area lies approximately 21 kilometres from the island of Iona and is in close proximity to various islands and coastal communities within the southern Hebrides.

My objection is grounded in both planning and environmental considerations, assessed within the statutory and policy frameworks applicable to the determination of these applications. It is important to emphasise that the responsibility lies with the applicant to provide sufficient and robust evidence demonstrating that all relevant statutory tests and policy requirements are met. The onus is not upon objectors to prove the contrary. In this case, as detailed in the following sections, the applicant has failed to meet this evidential burden. Consequently, I conclude that the applications should be refused consent.

1.1.852 Seascape, Landscape and Visual Effects

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

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

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

When assessing the visual impact of proposed developments, it is important to compare the limitations of the visualisation materials with any mitigation measures put forward. In this case, the applicant has relied on visual evidence prepared in accordance with NatureScot's guidance. While this approach represents best practice, it is essential to recognise that printed visualisations cannot fully replicate the scale or immersive experience that a viewer perceives on site. This inherent limitation means that the visualisations may underrepresent certain perceptual effects or fail to capture the full extent of visual intrusion that could be experienced in reality.

Furthermore, the wireline drawings included within the panoramic projections share the same constraints as the accompanying photographic elements. These wireline images are not independent assessments but rather technical renderings integrated within the overall visualisation package. As such, they do not serve to correct or enhance the photographic representation but must be interpreted within the same limitations. This highlights the challenge in relying solely on these materials for a definitive understanding of the development's visual effects, suggesting that supplementary on-site assessments may be necessary to fully appreciate potential impacts.

In light of these considerations, while the visualisation materials provide a useful starting point for evaluation, their technical and perceptual limitations mean that conclusions drawn from them should be treated with caution. Decision-makers should weigh the visual evidence alongside other forms of assessment and recognise that the materials do not capture the full complexity of visual experience in the field. This balanced approach ensures that the potential impacts on visual amenity are neither overstated nor understated in the planning process.

The proposed development would introduce aviation and navigation lighting to a sea horizon that is currently devoid of any artificial illumination, thereby permanently altering the character of the night-time seascape throughout its stated 35-year operational lifespan. This change represents a significant departure from the existing conditions, where the absence of lighting contributes to the natural and unspoiled visual quality of the marine environment after dark.

Furthermore, this operational timeframe does not mitigate the policy implications of the harm caused. Granting consent for this development effectively constitutes an acknowledgment that the seascape in question is appropriate for wind farm use, with all the attendant visual impacts that such use entails. Therefore, the decision carries substantial weight in shaping the future character and management of the night-time seascape, beyond the immediate term of the development's operation.

The proposal's failure to adequately address the scale of its impacts on landscape and seascape interests results in non-compliance with key planning policies, thereby undermining the protection afforded to nationally important areas. This practical shortcoming means that the development risks causing unacceptable harm to these valued environments, contrary to the guiding principles set out in national policy frameworks.

Specifically, the effects of the proposal engage multiple provisions, including NPF4 Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively seek to safeguard the integrity and character of significant landscapes and seascapes from adverse development impacts. The applicant has not demonstrated that its assessment of the scale of these effects aligns with the methodology it employed, creating uncertainty and undermining confidence in the conclusions presented.

Given this lack of demonstrated compliance, the proposal cannot be considered to meet the statutory requirements for protecting nationally important landscapes and seascapes. It follows that the application should be refused on the grounds of failing to satisfy relevant planning policies designed to preserve these environmental assets for the benefit of current and future generations.

1.1.853 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment fails to demonstrate compliance with the required methodology for evaluating impacts on the setting of historic assets, thereby undermining the reliability of its conclusions regarding heritage harm. Although the applicant adopts Historic Environment Scotland's established methodology—developed through consultation and requiring a specific evaluative step to determine whether changes affect the contribution setting makes to cultural significance and whether the integrity of setting is retained—the published Methodological Audit identifies a critical omission. The Audit, based solely on the applicant's Appendix 14.3, finds that while the operational assessment describes visual changes such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it does not show how the integrity of setting has been assessed in line with the methodology's explicit requirement. Instead, the assessment concludes without evidencing this evaluative step, leaving the claimed retention of setting integrity unsubstantiated. This fundamental gap calls into question the robustness of the applicant's heritage impact conclusions.

While the applicant's assessment acknowledges the cultural significance of the affected heritage assets, it primarily focuses on isolated viewpoints rather than the broader experiential qualities integral to their value. The applicant's baseline records identify key attributes such as pilgrimage routes, arrival by sea, movement through a living cultural landscape, and the interconnectedness of monuments with spirituality and the surrounding landscape and seascape. These qualities are inherently dynamic, experienced through movement rather than from fixed positions, yet the assessment falls short in fully capturing this complexity.

Historic Environment Scotland's consultation responses, as documented within the application, underscore this shortfall by requesting additional viewpoints to ensure

the wider cultural landscape and experiential dimensions are adequately represented. Without incorporating these broader perspectives, the assessment risks underestimating the heritage impacts, as the significance of the assets arises from their relationship with the landscape and the journey through it, rather than from discrete visual snapshots alone. Therefore, the current approach does not sufficiently address the cultural significance established in the baseline, and further refinement is necessary to appropriately inform decision-making.

The landscape assessment forms the foundation upon which the heritage impact conclusions are drawn. When the landscape effects are understated, as has been demonstrated, any heritage conclusions that rely on that assessment inevitably adopt the same understatement. This interdependence calls into question the robustness of the heritage conclusions presented.

Given the reliance of heritage assessments on the landscape evaluation, it is essential that the landscape effects are accurately and comprehensively appraised. Failure to do so undermines the credibility of the heritage conclusions and suggests that the overall impact may be more significant than acknowledged. Consequently, the heritage impact conclusions should be re-examined in light of a more thorough and transparent landscape assessment.

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

1.1.854 Effects on Island Communities, Tourism and the Local Economy

There is considerable uncertainty regarding the potential impacts of the proposed development on the fundamental economic and social sustainability of the island communities in question. These communities exhibit an exceptional degree of dependence on visitors, whose presence is closely tied to the intrinsic qualities of the islands. The applicant’s own baseline assessments identify these qualities as including landscape, seascape, cultural heritage, tranquillity and remoteness.

Any alteration to these defining characteristics poses a direct threat to the economic foundations of the island communities. Given that the visitors are drawn specifically by these attributes, changes affecting them could undermine the very reasons for tourism and visitation. This, in turn, risks destabilising the local economy which supports not only businesses but also essential services, infrastructure and employment opportunities within these communities.

The potential consequences extend beyond economic considerations to touch upon the social fabric and long-term viability of the islands’ populations. If the qualities that attract visitors are compromised, there is a real danger that the communities’ ability

to sustain themselves will be jeopardised. It is therefore imperative to approach the proposal with caution, recognising the significant uncertainties surrounding its effects on the islands' unique and delicate balance.

The applicant's own consultants have acknowledged that habitability represents a potentially significant pathway through which the proposed development could impact island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 adopts a regional approach, focusing in detail on potential port communities while failing to conduct an equivalent place-based evaluation of the island communities directly facing the development. Nonetheless, the assessment concludes that these island communities possess low sensitivity to tourism effects.

This approach is fundamentally flawed, as small island economies cannot be accurately represented by regional averages. Such economies are typically concentrated in sectors that are most vulnerable to changes in the characteristics that attract visitors. Rather than diminishing their sensitivity, dependence on increasing visitor numbers actually intensifies the vulnerability of these communities to any alterations in those qualities. Therefore, the conclusion of low sensitivity drawn without a place-specific analysis is not supported by evidence but rests on an unfounded assumption.

In summary, the applicant's socio-economic assessment methodology is inadequate for understanding or mitigating impacts on island communities, as it neglects the particular vulnerabilities and economic dependencies inherent to such locales. This gap undermines the reliability of the assessment's findings regarding the sensitivity of the island communities affected by the proposal.

The proposal fails to meet essential planning and statutory standards concerning the protection and assessment of island communities, resulting in a significant shortfall in compliance that undermines the decision-making process. National Marine Plan policy GEN 19 and paragraph 4.81 explicitly require that decisions affecting marine and island environments be founded on robust socio-economic evidence, adopting a precautionary approach where such evidence is incomplete or uncertain. Furthermore, NPF4 Policy 11(c) alongside the Islands (Scotland) Act 2018 impose a clear statutory duty to assess and appropriately weigh the interests of island communities, ensuring meaningful engagement from the earliest stages through to the conclusion of the planning process.

In this case, the applicant has acknowledged the necessity of particular scrutiny for island communities but has failed to conduct the requisite assessment to understand the proposal's potential effects on them. There is a notable absence of evidence demonstrating compatibility with the sustainability of these communities, nor is there any indication that the statutory duties owed to island populations have been satisfactorily fulfilled. This omission contravenes both policy and legislative requirements, leaving the interests of island communities insufficiently considered and inadequately protected.

In conclusion, the proposal does not comply with the relevant planning policies or statutory obligations relating to island communities. The lack of a thorough assessment and meaningful engagement means that the proposal cannot be regarded as compatible with the principles of sustainable development for island communities, nor can it be approved without rectifying these fundamental deficiencies.

1.1.855 Ecology, Biodiversity and Habitats Regulations

The proposed development would bring construction, operational, and decommissioning activities into an ecologically sensitive marine environment on a very large scale and for an extended period of several decades. This sustained presence of industrial activity is likely to have significant adverse effects on the local ecosystem due to the scale and duration of disturbance.

The site itself contains Priority Marine Features and Annex I habitats, which are recognised for their ecological importance and vulnerability. Surrounding waters are also home to a range of protected species, including seabirds, marine mammals, and basking sharks. The presence of such habitats and species underscores the high environmental sensitivity of the area and the potential for the proposed development to cause substantial ecological disruption.

Given these factors, careful consideration must be given to the potential environmental impacts before proceeding. The scale of activity and the ecological value of the site and adjacent waters together indicate a significant risk of harm to protected habitats and species, which must be fully accounted for in the planning process.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are customarily prepared in circumstances where the possibility of an adverse effect on the integrity of a protected site cannot be definitively ruled out. Their inclusion in this application is therefore a noteworthy aspect, as it indicates the applicant’s acknowledgment of potential impacts. Moreover, the applicant’s own position implies that Scottish Ministers may ultimately reach a different conclusion regarding the presence or extent of any adverse effects. In light of this, the submission of these derogation and compensation documents reflects a recognition of the need to address and mitigate possible harm to protected species and sites under the relevant statutory provisions.

While mitigation, compensation proposals, and future monitoring are often presented as means to address potential impacts on protected habitats and species, they do not, in isolation, satisfy the stringent legal requirements set out under the Habitats Regulations. Consent may only be granted if the competent authority is satisfied beyond reasonable scientific doubt that the integrity of the protected site will not be adversely affected. This high evidential standard places the onus firmly on the applicant to demonstrate compliance. The statutory tests are unequivocal, and reliance on proposed mitigation measures cannot substitute for clear evidence that the development will cause no harm. This legal framework is further reinforced by

relevant provisions within the Habitats Regulations, GEN 9 and GEN 13 of the National Marine Plan, and Policies 3, 4(b), 4(e), and 4(f) of NPF4. Consequently, any planning consent must be predicated on definitive assurances rather than assumptions of future mitigation efficacy.

The applicant has failed to demonstrate that the statutory tests intended to protect internationally important habitats and species can be satisfied. This conclusion is drawn directly from the submitted evidence, including the applicant's own derogation documents, which reveal an insufficient degree of certainty regarding compliance with these legal requirements. Without clear assurance that the necessary protections will be met, the application falls short of the statutory standards designed to safeguard ecological features of international significance, thereby undermining any case for granting planning consent.

1.1.856 Cumulative and In-Combination Effects

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

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

Moreover, this approach is inconsistent with established legal principles. The courts, as affirmed in Raeshaw Farms, have made clear that a project must be assessed in its entirety and not divided into smaller parts whose individual effects seem diminished. Therefore, the current assessment method is procedurally and legally flawed, as it prevents a comprehensive evaluation of the project's cumulative impacts.

The cumulative impact assessment presented in the Environmental Impact Assessment is fundamentally unreliable due to flawed baseline assessments. Specifically, the cumulative assessments rely on conclusions drawn from the underlying landscape, heritage, and socio-economic evaluations. As these foundational assessments understate the effects, the cumulative assessment consequently adopts a reduced baseline. This approach results in an underestimation of the combined effects of the proposed development alongside existing, consented, and foreseeable projects. Therefore, the true scale of cumulative impacts is obscured, undermining the accuracy and credibility of the overall environmental appraisal.

The assessment identifies a clear shortfall in compliance with established planning policies and environmental regulations concerning project splitting and cumulative

effects. Specifically, the applicant has failed to satisfactorily demonstrate that the cumulative and in-combination impacts of the proposal, including the effects of the project as a whole, have been reliably identified and assessed. This omission engages key provisions such as GEN 21 and paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the requirements set out in the Environmental Impact Assessment Regulations.

Given this context, it is essential that the decision-making process explicitly addresses the treatment of deferred works. Without a comprehensive evaluation of these components, the assessment remains incomplete and risks underestimating the true environmental consequences of the development. The absence of such consideration undermines the integrity of the planning review and the ability to fully comply with the legislative framework.

In conclusion, I respectfully request that the determination expressly considers the deferred works and ensures that the cumulative and in-combination effects are thoroughly and transparently evaluated. This approach is necessary to uphold policy compliance and to facilitate an informed and responsible planning decision.

1.1.857 Public Engagement, Site Selection and Environmental Information

The consultation process concerning the site-selection has demonstrably failed to meet required standards of effective public participation, thereby undermining the legitimacy of the overall decision-making framework. The applicant urges Scottish Ministers to attribute significant weight to the site-selection process; however, the quality of public engagement at both the plan and site-selection stages has been deficient and these shortcomings have persisted into the application phase. The application itself consists of many thousands of pages of technical material, yet the consultation period coincided with the busiest months for island communities, when residents are engaged continuously through the visitor season and access to specialist advice is severely limited. Meanwhile, the applicant has had years to prepare its case with substantial professional and financial resources, creating an imbalance that hampers genuine public involvement.

National Marine Plan policy GEN 18, alongside the principles of effective public participation enshrined in the Aarhus Convention, mandates that those affected by decisions of such magnitude must be afforded a realistic and meaningful opportunity to participate. The conditions under which the affected communities have been required to respond fall significantly short of this standard. It is therefore imperative that Scottish Ministers give careful and critical consideration to these procedural deficiencies when evaluating the representations submitted, as they bear directly upon the fairness and credibility of the site-selection process.

The practical consequence of the insufficiency of the Environmental Impact Assessment (EIA) submitted is that the Scottish Ministers are unable to make a fully informed decision on the application. The EIA serves as the principal evidential basis for determination, and its sufficiency, rather than its extent, is the critical issue. Across key topics, the application identifies potential significant effects but either fails to investigate them comprehensively or employs methodologies that do not substantiate the conclusions reached. For example, the landscape assessment

presents outcomes based on a distance pattern not supported by its own written methodology; the heritage assessment does not demonstrate the application of its own integrity test; and the socio-economic assessment lacks place-based analysis pertinent to the affected islands. Furthermore, the reliance on future assessments, post-consent plans, monitoring, and additional approvals is inadequate, as the EIA Regulations require that likely significant effects are understood prior to determination. Consequently, the Scottish Ministers must base their decision on the evidence presently before them, not on the assumption that unresolved matters will be satisfactorily addressed later. The applicant has not demonstrated that the environmental information provided meets this requirement, rendering the EIA insufficient for the purpose of determination.

1.1.858 Effects on Local Area

The applicant's environmental and heritage impact assessment notably underrepresents the direct and significant effects on the communities of Islay, Colonsay, and Oronsay. Islay and Colonsay are geographically the closest to the proposed development area, which extends immediately north-west of Islay and west of Colonsay across a substantial 448 square kilometre zone. However, the application primarily approaches Islay through the perspective of its potential as a direct project location rather than recognising and analysing it as an affected island community in its own right. In particular, the Atlantic-facing communities of Islay confront the nearest edge of this extensive development area, yet the assessment fails to provide a place-based evaluation of the consequent effects on their setting, local economy, or community life. This omission substantially undermines the reliability of the environmental impact evaluation, as it neglects the lived experience and socio-economic fabric of these vulnerable communities directly adjacent to the development.

For Colonsay and Oronsay, the situation is further accentuated by the fact that their seaward outlook—the very aspect that defines daily life and cultural identity—faces the development array directly. Colonsay's coastline includes the North Colonsay and Western Cliffs Special Protection Area, which is central to the applicant's derogation case and proposed compensation plan. This area is explicitly acknowledged as internationally protected due to its seabird populations, and the applicant concedes that harm to these populations cannot be ruled out. The presence of Oronsay Priory, a scheduled monument of national importance within this community, further intensifies the need for careful consideration. The heritage assessment's identified gaps apply with full force to Oronsay Priory's open maritime setting, which is integral to its historical and cultural significance. Collectively, these inadequacies in the applicant's assessment—both environmental and heritage—demonstrate a fundamental underassessment of the effects on these islands, compromising the credibility and comprehensiveness of the impact evaluation presented.

The applicant's own Coastal Character assessment recognises that the Sound of Iona is of high sensitivity, directly oriented towards the proposed development, with extensive visibility and a large geographical extent of change. The overall effect is classified as Moderate and Significant, impacting an area approximately 21 kilometres away, with turbines spanning around 39 degrees of the horizon. Similarly,

the West Coast of Iona is identified as highly sensitive with widespread visibility, and the applicant acknowledges significant effects on residents and visitors throughout much of the island, including at Dùn Ì, Iona's highest point. This demonstrates that the scale of visual impact is substantial and geographically extensive.

Despite this, the assessment underestimates the cultural and community significance of these effects. Iona's monastic landscape, comprising internationally important heritage assets such as the Abbey, the Nunnery, and high crosses, is intrinsically linked to pilgrimage, arrival by sea, and movement through the landscape, as detailed in the applicant's own baseline. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet no visualisations were provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, leaving important heritage perspectives unassessed. Furthermore, a household consultation revealed that 92 per cent of Iona respondents object to the proposal, yet the applicant failed to assess habitability impacts, despite acknowledging this as a potential pathway of effect. The perceived scale of the turbines is emphasised by the comparison to Ben Hynish on Tiree, a 141-metre landmark visible from Iona at 33 kilometres; the turbines would exceed this height by approximately 194 metres at just two-thirds of that distance. Taken together, these factors indicate that the applicant's evaluation significantly understates the visual, community, and heritage impacts on Iona, compromising the accuracy of the environmental and social impact assessment.

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

Further concerns arise regarding other significant islands within the same National Scenic Area. Staffa, one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development site—beyond the 30 kilometre limit to which NatureScot recommended assessing effects on National Scenic Area qualities. The applicant concludes that any changes at Staffa would be small and not significant, a judgment that appears inconsistent with their own acceptance of the island's panoramic maritime qualities. Similarly, the Jura National Scenic Area, recognised for its wild and undeveloped Atlantic character, is assessed as having only Medium to Low magnitude effects despite its High sensitivity and proximity of 28 to 32 kilometres. This moderation is attributed to distance and retained landforms, yet it fails to adequately reflect the intrinsic value of Jura's outlook that underpins its designation.

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

The applicant's assessment concludes that the South Tiree coastal area, despite being approximately 35 kilometres away, experiences only a Low magnitude of change, even though it is acknowledged as having High sensitivity. This practical consequence is significant because it suggests that the visual and landscape impacts on Tiree's sensitive environment are minimal, which risks underestimating the true extent of change that the proposed development would cause. Such an understatement could lead to insufficient mitigation measures and a failure to fully protect the island's distinctive character.

Tiree's landscape is exceptionally low-lying and defined by the interplay of sea and sky, with its highest elevation, Ben Hynish, reaching only 141 metres. The introduction of turbines up to 335 metres tall would create vertical elements unprecedented in the island's open seascape, fundamentally altering the horizon that is central to its character. Given this context, assigning a Low magnitude of change

to such a sensitive receptor is inconsistent with the physical reality and landscape experience, leading to an unreliable evaluation of effects that should be revisited to accurately reflect the scale of visual intrusion.

The applicant's assessment fails to consider significant effects on mainland and island communities that have direct visual and economic connections to the seascape in question. Notably, Gigha, a community-owned island emblematic of island regeneration, faces the development from the east, yet the potential impacts on its delicate community balance and economy remain unexplored. Similarly, Ardnamurchan Point—the most westerly tip of the British mainland—offers panoramic views along the Hebridean seaboard, attracting visitors whose experience depends on the unspoiled seaward panoramas. These receptors, critical to the local visitor economy, appear to be dismissed through a distance-based moderation approach. Furthermore, the west coast of Kintyre encompasses a series of communities whose identity and tourism are closely tied to the open Atlantic seaboard views towards Islay, Jura, and adjacent waters. The Treshnish Isles and other small islands and mainland coasts with sightlines to the development area share this vulnerability. The omission of these communities from thorough assessment undermines the comprehensiveness and reliability of the applicant's environmental evaluation.

There remains significant uncertainty regarding the applicant's approach to assessing environmental effects beyond 20 kilometres. The evidence clearly shows a consistent pattern whereby, whenever a highly sensitive receptor is located beyond this distance threshold, the assessment systematically moderates the magnitude of change and discounts the resulting effect. Crucially, this approach means that the communities actually experiencing these effects have not been subject to any place-specific evaluation. Such a methodology fundamentally undermines the integrity of the environmental impact assessment by failing to provide a comprehensive and accurate account of impacts on sensitive receptors at greater distances. It is therefore essential that the assessment be revisited to ensure that all affected communities receive proper consideration.

1.1.859 Personal Observations

In addition to the planning matters above, I am personally concerned because: My grandfather was born on Iona and my cousin lives in an original family dwelling. This proposal risks irreparable harm to the community of residents and visitors seeking spiritual solace who populate the island

Based on my own local knowledge, I also wish to highlight that: All of these should receive greater consideration. Time must be invested to ensure all views are heard.

Finally, I would also ask the Scottish Ministers to consider: The people directing the effort to make decisions affecting all these aspects of island life have covered all the relevant stakeholders.

1.1.860 Further Comments

I want the ancient history and my family's history on Iona to be respected and made available to future generations. There are too many unknowns about this project to be sure this objective will be attained.

1.1.861 Summary

The proposal for the MachairWind Offshore Wind Farm has not been shown to satisfy the relevant statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal area. Moreover, the applicant's published analyses reveal that the extent of these impacts has been underestimated, and that an essential heritage assessment remains incomplete. Although the effects on the island communities involved were identified, no thorough assessment of these impacts has been undertaken. In addition, the ecological criteria necessary for approval have not been demonstrated as achievable. It is also important to note that the application before the Scottish Ministers does not encompass the entire project.

In light of these substantial deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to deny the related marine licence.

Should the Ministers consider granting consent, I request that they require the submission of additional environmental information and enhanced visualisations. Furthermore, I propose that the applications be determined only following a public inquiry, providing an opportunity for detailed scrutiny of the issues raised in this objection. Regardless of the outcome, I also ask that the Ministers explicitly address and record their conclusions concerning the effects on cultural heritage and the island communities affected by the development within their decision rationale.

Yours faithfully,

[Redacted]

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

Member of the public 591
Dear Sir/Madam,

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

The proposals envisage the construction of an offshore wind farm with a generating capacity of around 2 gigawatts. The development would involve between 91 and 144 wind turbines, each with a maximum blade tip height of 335 metres, situated within a designated Windfarm Development Area spanning approximately 448 square kilometres of marine space. This area lies to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in close proximity to the islands and coastal communities of the southern Hebrides.

My objection is grounded in both planning and environmental considerations, evaluated against the applicable statutory and policy frameworks guiding the determination of these applications. It is important to emphasise that the evidential responsibility lies with the applicant, who must demonstrate—through robust and sufficient evidence—that all relevant statutory tests and policy criteria are met. Objectors are not obliged to prove the contrary. In this case, for the reasons detailed below, the applicant has failed to satisfy this burden of proof, and therefore, the applications should be refused.

1.1.862 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989, which require the applicant to have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant is obliged to take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The evidence confirms that these statutory requirements have not been adequately addressed.

Schedule 9 explicitly mandates that both the applicant and the Scottish Ministers must have regard to these duties in the application and determination process. The absence of demonstrated compliance, coupled with identified deficiencies and omissions in the application’s consideration of these statutory factors, constitutes a direct conflict with the applicable legal and policy framework. Such failures are material and weigh decisively against the granting of consent.

Given the statutory importance of preserving natural beauty and protecting heritage and ecological assets, the application’s shortcomings in addressing these duties undermine its legitimacy. The lack of adequate mitigation measures further exacerbates the adverse impacts on these protected interests. Consequently, the

application does not meet the statutory threshold required under Schedule 9 of the Electricity Act 1989, and this failure must be given significant weight in the decision-making process.

The marine licence application under consideration fails to demonstrate compliance with the statutory requirements set out in Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland's National Marine Plan. The application does not adequately address the General Policies critical to the assessment, including GEN 4 on Co-existence, GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 and paragraph 4.85 on Cumulative Impacts. The absence of clear, robust evidence demonstrating adherence to these policies constitutes a fundamental deficiency in the application. This failure undermines the statutory assessment process, as the decision-making authority is required to ensure that authorisation decisions are taken in accordance with the National Marine Plan unless relevant considerations indicate otherwise. The application's shortcomings in evidencing compliance with these policies mean that the statutory framework has not been satisfied.

Furthermore, the evidence explicitly identifies omissions and conflicts with the applicable legal and policy framework, which weigh decisively against the granting of consent. The lack of demonstrated compliance with the National Marine Plan's General Policies, particularly those addressing environmental protection, historic environment safeguards, landscape considerations, and cumulative impacts, reveals procedural and substantive defects in the application. These deficiencies preclude a lawful and policy-compliant determination in favour of the proposal. In accordance with the Marine (Scotland) Act 2010 and the National Marine Plan, where compliance has not been demonstrated or where evidence reveals such conflicts and omissions, the appropriate conclusion is to refuse consent. Therefore, the marine licence application should be rejected on the grounds that it fails to meet the statutory and policy requirements essential for lawful authorisation.

The proposal fails to meet the fundamental legal requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations, which mandate that the likely significant environmental effects of any development must be thoroughly identified, assessed, and reported prior to determination. The absence of a comprehensive and compliant Environmental Impact Assessment (EIA) in this case represents a critical procedural and substantive deficiency. Without this essential assessment, the decision-making authority is deprived of the necessary evidence to understand the full scope and scale of environmental consequences, thereby undermining the statutory framework designed to safeguard environmental interests. This failure to provide an adequate EIA is not a minor oversight but a fundamental breach of the statutory process, which must weigh decisively against the granting of consent.

Furthermore, the proposal does not satisfy the requirements of the Habitats Regulations, which impose a clear duty to assess the effects of the development on European protected sites in accordance with the applicable statutory tests. The absence of a demonstrable Habitats Regulations Assessment (HRA) or any

evidence that these statutory tests have been properly applied constitutes a significant omission and legal non-compliance. Given the stringent protections afforded to European sites, any uncertainty or failure to demonstrate compliance with these regulations is a matter of serious concern. As established by the approved evidence, where compliance with the Habitats Regulations has not been demonstrated, or where deficiencies and omissions are evident, these factors must be regarded as material considerations against the proposal. In this instance, the lack of adequate assessment and failure to meet statutory obligations unequivocally justify refusal of consent.

The applicant's submission does not demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be considered and given due weight during the decision-making process. This statutory obligation is clear and unequivocal, as set out in the Act itself and reiterated in the supporting evidence (S01). The proposal documentation fails to provide adequate analysis or evidence that the specific needs, circumstances, and potential impacts on island communities have been properly identified, assessed, or integrated into the planning decision framework.

Furthermore, the absence of demonstrated compliance with the Islands (Scotland) Act 2018 constitutes a significant procedural and substantive deficiency. As established in the evidence (S01), where compliance has not been shown, or where there are identifiable omissions or conflicts with the applicable legal and policy framework, these shortcomings must weigh against the granting of consent. Given the critical nature of this statutory requirement and the failure of the applicant to address it satisfactorily, the proposal should be refused on the grounds that it does not meet the legal tests imposed by the Islands (Scotland) Act 2018.

The practical consequence of the applicant's failure to discharge the evidential burden of proof is that the application cannot be considered compliant with the relevant legal and policy requirements, thereby undermining the basis for granting planning consent. It is a fundamental principle that the applicant must demonstrate, by means of robust, objective, and proportionate evidence, that every applicable statutory duty, planning policy, and environmental assessment requirement has been fully satisfied. This responsibility is not discretionary but mandatory, ensuring that decision-makers have a clear and reliable evidential foundation upon which to assess the proposal's lawfulness and policy conformity.

In this case, the applicant has not met this essential evidential standard. The submitted documentation and supporting evidence fail to establish compliance with all relevant legal and policy frameworks. There are identifiable deficiencies and omissions within the evidence presented, which have not been adequately addressed or remedied. Moreover, certain aspects of the proposal conflict with statutory duties and planning policies, as evidenced by the absence of demonstrable conformity in the applicant's submissions. These shortcomings are material and substantive, directly impacting the integrity of the planning assessment process.

The absence of comprehensive and convincing evidence to prove compliance means that the application falls short of the statutory and policy requirements that govern the planning system. As established in the approved evidence, where

compliance has not been demonstrated, or where evidence reveals deficiencies, omissions, or conflicts with the applicable legal and policy framework, these factors must weigh decisively against the granting of consent. The applicant's failure to provide the necessary evidential assurance precludes the possibility of lawful approval.

In conclusion, the applicant has not fulfilled the requisite evidential burden to demonstrate compliance with all relevant statutory duties, planning policies, and environmental assessment obligations. This failure constitutes a fundamental flaw in the application, which, in accordance with established legal and policy principles, necessitates refusal of planning permission.

1.1.863 Conflict with National Planning Framework 4 and the Development Plan

While NPF4 Policy 11 endorses renewable energy development, this support is explicitly conditional upon compliance with its impact criteria, notably those addressing effects on communities, landscapes, seascapes, and other receptors. The proposal under consideration falls short of meeting these criteria, as it fails to demonstrate effective mitigation of significant adverse impacts. The policy's requirements, particularly Policy 11(c) concerning community impacts and Policies 11(d) and 11(e) relating to landscape and seascape effects, are not satisfactorily addressed by the submitted evidence. Consequently, the proposal does not align with the intended balance between renewable energy advancement and environmental and social safeguards established by NPF4.

Moreover, the proposal's deficiencies extend to the protection of cultural and ecological assets. It does not adequately prove that the cultural significance of scheduled monuments and their settings would be preserved, nor that the interests of island communities would be safeguarded. Additionally, the ecological tests mandated by the policy have not been convincingly met. These shortcomings collectively indicate a conflict with the impact criteria of NPF4 Policy 11, undermining the policy's framework that supports renewable energy only where such impacts are properly managed and mitigated. As such, the proposal cannot be considered compliant with the policy and should not be supported.

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

In the detailed assessment, it is evident that the proposal would result in significant adverse effects on nationally designated landscapes and seascapes. Furthermore, it has not been demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, nor that island communities would be adequately safeguarded. The evidence submitted also fails to show that the

ecological tests required under the relevant policies can be met. Accordingly, the proposal conflicts with the comprehensive suite of policies intended to protect these nationally important assets, and therefore does not accord with the provisions of NPF4.

The proposal would result in adverse effects upon the landscape, heritage, and community interests safeguarded by the terrestrial development plan, including the Argyll and Bute Local Development Plan 2. These impacts demonstrate a clear conflict with the policies designed to protect these valued local attributes. Consequently, the proposal fails to accord with the relevant development plan framework and, when considered alongside National Planning Framework 4 in its entirety, this inconsistency remains unaddressed by the applicant. On this basis, the proposal should be refused as it is fundamentally at odds with the established planning policies intended to preserve the terrestrial environment.

1.1.864 Seascape, Landscape and Visual Effects

The applicant's written methodology, as set out in Appendix 16.1, does not specify any distance threshold beyond which major effects cease. However, an independently prepared Evidence Note, which relies entirely on the applicant's Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern across all three assessment streams. This pattern demonstrates that no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of its sensitivity or the extent of visibility. Furthermore, the applicant's own documents acknowledge the influence of distance in their judgements; for example, an assessment of a coastal area over 30 kilometres away explicitly states that, due to the viewing distance, the scale of change is considered small. The Landscape Character synthesis further categorises magnitude as High within approximately 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types.

This approach leads to a systematic moderation of magnitude at precisely the distances where the most sensitive designated landscapes are located. Consequently, the inputs to the protective tests are understated, undermining the reliability of the conclusions drawn. As a result, the effects on these sensitive receptors are not accurately described in the applicant's assessment, thereby compromising the information upon which Scottish Ministers are requested to base their consent decision. It is therefore essential that the methodology be reconsidered to ensure that the scale of impact at all relevant distances is fully and transparently accounted for.

The applicant's visual evidence is prepared in accordance with NatureScot's visualisation guidance, which explicitly recognises inherent limitations in printed visualisations. This guidance highlights that such visual materials cannot fully replicate the scale perceived by a viewer on site. Consequently, while the visualisations provide a useful reference, they do not capture the full experiential context or the dynamic qualities of the landscape as seen in person.

Furthermore, the wireline drawings included within the panoramic projections are subject to the same constraints as the accompanying photography. These wirelines

serve as a technical rendering within the visualisation package rather than functioning as an independent corrective tool. Their role is therefore limited to augmenting the photographic evidence, without overcoming the fundamental perceptual constraints identified. Taken together, these factors demonstrate the importance of careful interpretation of the visual evidence and caution against overreliance on such materials in isolation.

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

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

1.1.865 Cultural Landscape, Archaeology and Historic Environment

There is uncertainty regarding the applicant's assessment methodology and the reliability of its conclusions about the impacts on heritage assets. Although the applicant states that it has adopted Historic Environment Scotland's recognised approach for evaluating effects on the setting of historic assets, questions remain about whether this methodology has been correctly applied. This approach, developed through consultation with Historic Environment Scotland, requires a careful evaluation of whether changes to setting affect the contribution that setting makes to the cultural significance of an asset, with particular emphasis on assessing whether the integrity of setting is maintained. Importantly, the methodology makes clear that visual change alone should not be directly equated with adverse impact.

A detailed Methodological Audit, prepared in support of community objections and based solely on the applicant's own Appendix 14.3, highlights that while the operational assessment identifies relevant heritage attributes, it fails to demonstrate how the integrity of setting has been properly assessed in line with the accepted methodology. Instead, the assessment focuses on describing visual changes such as visibility, distance, prominence of monuments, retained views, screening, and

skyline occupation. It then concludes that the integrity of setting is adequately retained without showing the required evaluative step that distinguishes between visual change and impact, as mandated by the methodology. This key evaluative analysis is absent in all the examples examined by the Audit.

Given this lack of demonstrated compliance with the prescribed methodology, the assessment's conclusions about the impacts on the heritage setting are undermined and cannot be relied upon without further clarification and evidence. It is therefore essential that the methodology be fully and transparently applied, with the necessary evaluative steps clearly articulated, to ensure a robust and credible understanding of heritage impacts in this case.

The applicant's baseline assessment recognises that the cultural significance of the heritage assets in question arises from a range of interrelated qualities. These include elements such as pilgrimage, arrival by sea, and movement through a living cultural landscape. Furthermore, the significance is closely tied to the relationships between monuments, spirituality, and the surrounding landscape and seascape, which are primarily experienced dynamically through movement rather than from fixed viewpoints.

Notwithstanding this acknowledgement, Historic Environment Scotland's consultation responses, as recorded within the application documentation, have emphasised the need for additional viewpoints to be incorporated. This request reflects a concern that the current assessment may not fully capture the broader experiential and cultural landscape qualities that contribute to the significance of the heritage assets. Without such additional viewpoints, the assessment risks presenting an incomplete understanding of how these assets are perceived and valued within their wider context.

Given the importance of these broader cultural and experiential factors, it is essential that the assessment fully represents the dynamic nature of the heritage setting. Addressing Historic Environment Scotland's concerns by incorporating further viewpoints would ensure a more robust and comprehensive understanding of the heritage impacts, thereby supporting a more informed decision-making process.

The heritage impact conclusions presented in the application are fundamentally reliant on the findings of the accompanying landscape assessment. It is acknowledged that where the landscape assessment underestimates the extent or significance of landscape effects, as previously outlined, such understatement inevitably affects the accuracy of the heritage conclusions derived from it. This interdependency means that any shortcomings in the landscape evaluation directly diminish the robustness of the heritage impact appraisal.

Given this reliance, the credibility of the heritage conclusions must be carefully scrutinised in light of the identified deficiencies in the landscape assessment. If landscape effects are understated, the heritage impacts, which are assessed on the basis of those landscape effects, will also be understated. This creates a risk that the true extent of harm or change to heritage assets and their settings may not have been fully recognised or appropriately mitigated in the assessment process.

Therefore, a thorough and accurate landscape assessment is essential to underpin any reliable heritage impact conclusions. Without rectifying the shortcomings in the landscape evaluation, it is difficult to place full confidence in the heritage impact findings as currently presented. This highlights the need for a more robust and transparent approach to assessing landscape effects to ensure that heritage considerations are properly informed and addressed.

The applicant's submission engages directly with National Planning Framework 4 (NPF4) Policy 7, specifically subsection (h) concerning scheduled monuments, as well as subsections (c) and (d) relating to the settings of heritage assets. This is further supported by compliance requirements under Policy GEN 6 and the guidance set out in paragraphs 4.22 to 4.23 of the National Marine Plan. These provisions collectively establish a clear framework for the protection of internationally and nationally important cultural heritage assets and their settings within the planning process.

However, the application fails to satisfy these policy requirements. The applicant has not provided sufficient evidence to demonstrate that the cultural significance of the identified heritage assets and their settings will be preserved. Moreover, the Scottish Ministers are not presented with the necessary assessment or conclusion to verify that such protection will be achieved. This omission undermines the acceptability of the application, as it does not meet the established policy standards for heritage protection. Consequently, the proposal cannot be considered compliant with the relevant statutory and policy obligations designed to safeguard these important heritage assets.

1.1.866 Effects on Island Communities, Tourism and the Local Economy

The applicant's own baseline assessments acknowledge that the island communities affected by the proposed development rely heavily on visitors who are drawn specifically by the distinctive qualities of the area. These include the landscape, seascape, cultural heritage, tranquillity and remoteness. Such attributes are fundamental to the visitor appeal and, by extension, the economic foundation of these island communities.

Any alteration to these intrinsic qualities directly undermines the economic base upon which these communities depend. This, in turn, jeopardises the provision of local services, threatens population retention, and ultimately compromises the long-term viability and sustainability of the island settlements. The proposal, therefore, poses a significant risk to the fundamental economic and social sustainability of these island communities.

The practical consequence of the applicant's flawed socio-economic assessment is a failure to properly identify and mitigate impacts on the island communities affected by the proposed development. The applicant's own consultants acknowledged that habitability could be a significant pathway for effects on these communities, yet no specific assessment of habitability was undertaken. Instead, the socio-economic analysis presented in Chapter 18 focuses predominantly on regional-level impacts and provides detailed consideration of port communities, while neglecting equivalent place-based scrutiny of the island communities themselves. Despite this omission,

the assessment nonetheless concludes that the island communities are of low sensitivity to tourism effects, a conclusion that lacks substantiation.

This approach fundamentally misunderstands the nature of small island economies. Unlike broader regional averages, these economies are typically concentrated in sectors that are directly vulnerable to changes in the attributes that attract visitors. The dependence on visitor numbers does not mitigate sensitivity to tourism-related impacts; rather, it intensifies the vulnerability by deepening reliance on the very qualities that may be compromised by the development. Consequently, the assertion of low sensitivity for island communities, reached without any place-specific analysis, amounts to an unfounded assumption rather than an evidence-based conclusion.

Given these deficiencies, the applicant's socio-economic assessment cannot be relied upon to inform a sound planning decision. The absence of a robust, place-based evaluation of the island communities leaves a significant gap in understanding the potential adverse effects of the proposal. Without addressing this critical shortcoming, the assessment fails to provide an adequate basis for mitigation measures or to ensure that the unique social and economic characteristics of these communities are properly protected.

The proposal falls short in meeting the required planning and statutory standards for assessing and protecting island communities, particularly when measured against the obligations set out in GEN 19 and paragraph 4.81 of the National Marine Plan. These provisions mandate that decisions must be based on robust socio-economic evidence and adopt a precautionary approach where such evidence is insufficient. Furthermore, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 impose a clear duty to assess and give weight to the interests of island communities through meaningful engagement throughout the decision-making process. In contrast to these requirements, the applicant has failed to undertake the necessary detailed assessment to understand the specific effects of the proposal on island communities.

This deficiency is not a mere procedural oversight but a substantive failure to demonstrate compatibility with the sustainability of island communities or to discharge the statutory duties owed to them. The applicant's recognition that island communities require particular scrutiny is not matched by the evidence or engagement provided. Without the appropriate assessment and meaningful consultation from inception to conclusion, the proposal cannot be deemed compliant with the statutory and policy framework designed to safeguard island communities. Consequently, the application should be regarded as non-compliant with essential planning policies and statutory duties.

1.1.867 Ecology, Biodiversity and Habitats Regulations

The proposed development site and its adjacent waters encompass Priority Marine Features and Annex I habitats, which are ecologically significant. Additionally, the surrounding marine environment supports populations of seabirds, marine mammals, and basking sharks. Introducing large-scale construction, operational activities, and eventual decommissioning over several decades poses a substantial risk of significant adverse environmental impacts to these sensitive ecological resources.

The practical consequence of the applicant's submission of a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan is that it acknowledges the potential for adverse effects on the integrity of the North Colonsay and Western Cliffs Special Protection Area, particularly concerning the guillemot population. These documents are specifically prepared for circumstances where it cannot be definitively ruled out that the development would harm the protected site. Their inclusion in the application therefore signals that the applicant recognises the possibility that the proposed development may have significant environmental impacts requiring mitigation.

Importantly, the submission of these derogation and compensation documents serves a procedural and substantive function within the planning process. It indicates that the applicant has sought to comply with the necessary legal and policy frameworks governing protected sites, by proposing measures intended to address and offset any potential harm. However, this does not represent a definitive conclusion on the absence of adverse effects. On the applicant's own approach, there remains scope for the Scottish Ministers to reach a differing view regarding the likelihood or extent of any impacts on site integrity, which may influence the ultimate determination of the application.

In light of this, while the submission of these documents demonstrates an awareness and preliminary attempt to manage environmental risks, it also underscores the unresolved nature of the assessment of effects on the protected guillemot population. The application must therefore be carefully scrutinised to ensure that any potential adverse effects are fully considered and that any proposed compensation measures are robust, proportionate, and deliverable. Only through such a thorough approach can appropriate protection of the Special Protection Area be secured in accordance with planning policy and statutory obligations.

Consent for developments that may affect protected habitats and species can only be lawfully granted if it is conclusively demonstrated that the proposal will not adversely affect the integrity of the designated site. This requirement, established under the Habitats Regulations, imposes a rigorous evidential standard: no reasonable scientific doubt can remain regarding the absence of adverse effects. Consequently, the applicant bears the full burden of proof to satisfy this high threshold.

This legal requirement is further reinforced by relevant planning policies, including GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). Together, these policies underscore the necessity for stringent assessment and caution in decision-making concerning developments impacting protected natural assets, ensuring that environmental safeguards are paramount.

It is important to note that mitigation strategies, compensation measures, or proposals for future monitoring cannot, in isolation, fulfill the statutory tests required under the Habitats Regulations. Only where these rigorous conditions are met without reasonable scientific doubt may consent be lawfully granted. This framework ensures that protection of habitats and species is not compromised by speculative or insufficiently evidenced development proposals.

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

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

In light of these points, the case for granting consent cannot be supported. The statutory tests exist to ensure the protection of internationally important ecological assets, and the applicant has not met these essential legal thresholds. Consequently, the application should be refused to uphold the integrity of environmental safeguards enshrined in law.

1.1.868 Cumulative and In-Combination Effects

The current application before the Scottish Ministers addresses only a portion of the overall project, notably excluding the export cable corridor and the onshore transmission works, which are essential components without which the wind farm cannot function. Consequently, the environmental and planning effects of the entire development are not assessed collectively; instead, these significant elements are reserved for consideration under separate, subsequent consenting processes following the principal decision. This segmentation results in an incomplete evaluation of the project’s full impact at the decision-making stage.

Such an approach conflicts with established legal principles, as emphasised in the Raeshaw Farms case, where the courts affirmed that a project must be appraised in its entirety rather than being fragmented into smaller parts whose individual effects may appear diminished. By deferring key components to later applications, the current assessment method effectively undermines comprehensive scrutiny, compromising the integrity and completeness of the planning process. This procedural flaw renders the present evaluation legally and procedurally unsound.

The cumulative impact assessment presented is unreliable because it fundamentally relies on baseline assessments that understate the effects on landscape, heritage, and socio-economic factors. As outlined in the Environmental Impact Assessment, these initial assessments fail to fully capture the extent of harm, resulting in a diminished baseline from which cumulative impacts are evaluated. Consequently, when the proposal’s combined effects with existing, consented, and foreseeable developments are considered, the assessment systematically underestimates the true scale of cumulative harm. This flawed approach compromises the accuracy and robustness of the cumulative assessment, leading to an unjustifiably optimistic

conclusion about the overall impact. Therefore, the cumulative effects as presented cannot be relied upon for informed decision-making.

There remains significant uncertainty regarding the applicant's compliance with established planning policies and environmental regulations, particularly concerning project splitting and the assessment of cumulative effects. The proposal has not satisfactorily demonstrated adherence to GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), nor the requirements set out in the EIA Regulations. This lack of clarity undermines confidence that the cumulative and in-combination effects, both of the current proposal and the project as a whole, have been reliably identified and thoroughly assessed.

Given these unresolved issues, it is imperative that the decision-making process explicitly addresses how deferred works are to be treated. Without such consideration, there is a material risk that significant environmental impacts may be overlooked or underestimated. Therefore, I respectfully request that the determination expressly incorporates an assessment of the deferred elements to ensure full compliance with policy and regulatory frameworks.

1.1.869 Public Engagement, Site Selection and Environmental Information

The consultation period for this application, comprising many thousands of pages of technical material, occurred during the busiest months of the year for island communities, when residents are engaged continuously through the visitor season and specialist advice is least accessible. This timing has significantly constrained effective public participation, particularly given that the applicant has had years and substantial professional and financial resources to prepare its case. The weight the applicant asks the Scottish Ministers to place on the site-selection process renders the quality of public involvement in that process directly material. However, deficiencies in participation at both the plan and site-selection stages have persisted into the current application phase. Under GEN 18 of the National Marine Plan and the principles of effective public participation enshrined in the Aarhus Convention, those affected must have a realistic opportunity to engage in decisions of this magnitude. The conditions under which these island communities have been expected to respond fall short of this standard. It is therefore imperative that the Ministers take these shortcomings fully into account when considering the representations made.

The Environmental Impact Assessment forms the essential evidential foundation for the Scottish Ministers' decision-making on this application. However, significant deficiencies undermine its sufficiency. Across several critical topics, the assessment identifies potential pathways to significant effects but fails either to investigate them thoroughly or to apply appropriate methodologies. For instance, the landscape assessment's conclusions rely on a distance-based pattern absent from its own stated methodology; the heritage assessment does not adequately apply its declared integrity test; and the socio-economic assessment omits any place-based analysis of the affected islands.

Moreover, the application frequently depends on future assessments, post-consent plans, monitoring schemes, and subsequent approvals to address unresolved

issues. This approach conflicts with the requirements of the Environmental Impact Assessment Regulations, which mandate that likely significant effects be comprehensively understood prior to determination. Reliance on uncertain future measures cannot substitute for robust, complete information at this decisive stage.

In conclusion, the Scottish Ministers must base their determination on the evidence currently before them, not on assumptions that outstanding matters will be satisfactorily resolved after consent. The applicant has not demonstrated that the environmental information submitted meets the standard of adequacy necessary for an informed decision. Consequently, the assessment as presented is insufficient to support approval.

1.1.870 Effects on Local Area

The applicant's assessment significantly underestimates the direct and substantial effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby undermining the reliability of the environmental and heritage impact evaluation. Islay and Colonsay are the closest inhabited islands to the proposed development area, which covers 448 square kilometres immediately north-west of Islay and west of Colonsay. Despite this proximity, the application predominantly views Islay only as a potential project location rather than as a distinct island community subject to significant impact. Consequently, there is no place-based assessment of how the development would affect Islay's Atlantic-facing communities, their setting, economy, or community life.

For Colonsay and Oronsay, the situation is more acute as their seaward outlook directly faces the development array. The North Colonsay and Western Cliffs Special Protection Area, which constitutes Colonsay's coastline, is central to the applicant's derogation case and compensation plan. This indicates the strongest recognition within the application that harm to the internationally protected seabird population on these cliffs cannot be discounted. Furthermore, Oronsay Priory, a scheduled monument of national importance located within this community, suffers from the same deficiencies identified elsewhere in the heritage assessment, particularly concerning the evaluation of its open maritime setting.

In summary, the failure to adequately assess the effects on these island communities and their heritage assets results in a flawed and incomplete environmental and heritage impact appraisal, raising serious concerns about the overall reliability and robustness of the applicant's evaluation.

The applicant's Coastal Character assessment recognises the Sound of Iona as an area of high sensitivity, noting its direct orientation towards the proposed development, extensive visibility, and a large geographical extent of change. The assessment quantifies the overall effect as moderate and significant, with visibility extending approximately 21 kilometres and turbines occupying around 39 degrees of the horizon. This finding is consistent with the high sensitivity attributed to the west coast of Iona, where widespread visibility is similarly acknowledged. The applicant concedes that significant effects will be experienced by residents and visitors across much of the island, including at Dùn Ì, the island's highest point.

Despite these acknowledgements, the assessment falls short in fully capturing the scale and significance of the impacts on Iona's internationally important monastic landscape. The Abbey, the Nunnery, and the high crosses are central to the heritage value of the island, with their significance closely tied to pilgrimage, arrival by sea, and movement through the landscape as established in the applicant's own baseline evidence. Historic Environment Scotland's request for additional viewpoints, including from the ferry crossing between Fionnphort and Iona, was not comprehensively addressed; notably, no visualisation is provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, a location of particular heritage relevance.

Community concerns further underscore the gravity of the potential impacts. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal. The applicant's own consultants identify habitability as a potential pathway of effect on the community, yet this crucial aspect was never assessed, leaving a significant gap in the social impact evaluation. The perceived scale of the development can be further contextualised by comparison with a familiar local landmark: Ben Hynish on Tiree, standing at 141 metres and visible from Iona at approximately 33 kilometres, would be dwarfed by the largest turbines, which would exceed Ben Hynish's height by around 194 metres and be located at roughly two-thirds of that distance.

In summary, while the applicant recognises some significant effects on Iona, the assessment underestimates the extent and importance of visual, community, and heritage impacts. This results in an incomplete and potentially misleading environmental and social impact evaluation, which must be addressed to ensure that the full implications for Iona are properly understood and mitigated.

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

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

Moreover, the applicant's evaluation does not sufficiently account for the economic and community implications for Mull's west-facing tourism sector. This includes wildlife boat operators and accommodation providers whose livelihoods depend on the largely unspoiled Atlantic seascape. These communities, integral to the area's character and economy, have not been subject to detailed place-based assessment,

leaving a significant gap in understanding the full consequences of the proposed development on these sensitive coastal landscapes and their dependent populations.

The applicant's assessment of the potential impacts on the wider seaboard designated landscapes and island communities appears to underestimate the significance of effects and omits critical considerations relating to vulnerable communities. While some mitigation measures are acknowledged, they do not fully address the specific sensitivities of these areas. For instance, Ulva, situated within the Loch na Keal National Scenic Area, is a community-owned island in the early stages of regeneration. Its recovery depends heavily on the preservation of its unspoilt seascape and setting, yet the applicant has failed to conduct any assessment of the effects on this small, re-establishing community.

Similarly, Staffa, also within the Loch na Keal National Scenic Area and recognised as one of the most celebrated small islands in Europe, lies approximately 35 kilometres from the development site. This distance exceeds the 30-kilometre range within which NatureScot requested that the qualities of National Scenic Areas be assessed. Despite this, the applicant concludes that the scale of change on Staffa would be small and the effect not significant, even though their own assessment acknowledges the island's panoramic maritime qualities. This inconsistency raises concerns about the adequacy of the evaluation.

Further designated landscapes such as the Jura National Scenic Area, assessed at 28 to 32 kilometres distance, are attributed only medium to low magnitude effects, primarily due to distance and retained landforms. However, Jura's designation relies on its wild and undeveloped Atlantic outlook, which may be more vulnerable to change than the assessment suggests. The Scarba, Lunga, and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres away, receive a similar treatment, which may similarly understate the potential impacts. Overall, the applicant's approach does not fully recognise the importance of these seascapes and island communities, thereby undermining the protection of their natural and cultural qualities.

The applicant's assessment concludes a Low magnitude of change on the South Tiree coastal area despite recognising its High sensitivity at a distance of approximately 35 kilometres. This practical consequence is significant, as it directly affects the reliability of the overall evaluation of the development's landscape and visual impacts on Tiree. By underestimating the magnitude of change, the assessment risks providing decision-makers with an incomplete understanding of the true scale of effects on this sensitive area.

Tiree's distinctive landscape character is defined by its exceptionally low-lying topography and the dominance of sea and sky. The island's highest point, Ben Hynish, rises only 141 metres, underscoring the open and expansive oceanic horizon that shapes its sense of place. Introducing turbines up to 335 metres tall would create vertical structures of unprecedented scale within this seascape, fundamentally altering the visual experience and character of the island. Such a dramatic visual intrusion cannot reasonably be characterised as having a Low magnitude of change.

In light of these considerations, the applicant's conclusion exemplifies a severe understatement of the effects on Tiree. The assessment's failure to fully acknowledge the scale of visual and landscape impact on this highly sensitive receptor undermines the reliability of its findings. Consequently, the evaluation should be revisited to ensure that the distinctive and vulnerable character of Tiree is adequately protected in the planning process.

The applicant's assessment fails to consider significant effects on mainland and island communities that have direct visual and economic connections to the seascape, undermining the comprehensiveness of the evaluation. For instance, Gigha, a community-owned island renowned nationally for its regeneration, faces the development waters directly from the east; yet, no examination has been made of the impacts on its delicate community balance and local economy. Similarly, Ardnamurchan Point—the westernmost tip of the British mainland—offers panoramic views along the Hebridean coast that attract visitors throughout the peninsula. These seaward panoramas, precisely the receptors affected by the distance-based mitigation measures challenged in this objection, have been overlooked. Furthermore, the west coast of Kintyre comprises a series of communities whose identity and visitor economy are shaped by the open Atlantic seaboard views towards Islay, Jura, and surrounding waters. The Treshnish Isles and other small islands with sightlines to the development area are equally disregarded. This collective omission calls into question the thoroughness of the applicant's assessment regarding the full range of receptors reliant on and influenced by this seascape.

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

Such a distance-based criterion undermines the integrity of the environmental impact assessment by failing to adequately recognise and address the experiences of highly sensitive receptors at greater distances. The absence of place-specific evaluation for these communities means that their exposure to environmental changes is neither fully understood nor properly mitigated. This methodological shortcoming calls into question the comprehensiveness and reliability of the applicant's assessment, suggesting that significant effects may be systematically underestimated and discounted, thereby weakening the overall robustness of the environmental evaluation.

1.1.871 Personal Observations

In addition to the planning matters above, I am personally concerned because: My family travel to Iona every year for the peace and tranquility of the Island.

This island is not the place for the wind farms as it would destroy the beauty of the place.

Based on my own local knowledge, I also wish to highlight that: I don’t live on the Island I only visit , but I believe greater consideration should be given in all aspects of this proposal. I don’t think you have considered any implications this proposal will have on all the locals, landscape, wildlife, community and the thousands of tourists that visit each year.

Finally, I would also ask the Scottish Ministers to consider: The Scottish Ministers should listen to those Islanders and do the right thing by all.

1.1.872 Further Comments

Stop the proposal!

1.1.873 Summary

The proposal submitted by the applicant fails to satisfy the statutory and policy requirements governing its determination. Notably, the applicant’s own assessments acknowledge substantial impacts on nationally designated landscapes as well as on the cultural heritage and communities along the coast. However, an analysis of the applicant's published documents reveals that these impacts have been consistently underestimated. Crucially, the necessary heritage assessment has not been conducted, and although effects on the island communities potentially affected were identified, no evaluation of these impacts has been undertaken. Furthermore, the ecological criteria set out for the project have not been demonstrated to be achievable. It is also important to note that only a portion of the overall development is currently before the Scottish Ministers for consideration.

In light of these deficiencies, it is respectfully urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm proposal, as well as decline the associated marine licence. Should the Ministers determine not to refuse, it is requested that the applicant provide additional environmental information accompanied by enhanced visualisations. Moreover, the applications should only be determined following a public inquiry, thereby enabling a thorough examination of the concerns raised in this objection. Regardless of the final decision, it is further requested that the Ministers explicitly address and conclude on the implications for cultural heritage and the island communities affected within their stated reasons.

Yours faithfully,

[Redacted]

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

Member of the public 592
Dear Sir/Madam,

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

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

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

1.1.874 Seascape, Landscape and Visual Effects

The applicant’s assessment methodology, as outlined in Appendix 16.1, notably lacks a specified distance threshold beyond which major effects are considered to cease. However, an independently prepared Evidence Note, drawing solely from the applicant’s Chapter 16 and associated appendices, reveals a consistent pattern across all assessment streams: no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, irrespective of its inherent sensitivity or the extent of visibility. Furthermore, the applicant’s own documentation explicitly acknowledges the influence of distance on their judgements, with examples such as a coastal area over 30 kilometres distant being assessed as experiencing only a small scale of change. Their Landscape Character synthesis further delineates High magnitude effects within roughly 20 kilometres, Medium effects between 20 and 30 kilometres, and Low effects beyond 30 kilometres for certain landscape types.

This implicit distance-based moderation of magnitude inputs has significant implications for the reliability of the assessment’s conclusions. By systematically reducing the magnitude of change at distances coinciding with the location of the most sensitive designated landscapes, the protective tests are effectively applied to understated effects. Consequently, the resulting conclusions fail to provide a dependable description of the landscape and visual effects that the Scottish

Ministers must consider in their decision-making process. Such methodological limitations cast doubt on the accuracy of the predicted effects and warrant careful reconsideration to ensure that the true extent of impact is comprehensively understood.

The applicant relies on NatureScot's visualisation guidance, which explicitly recognises inherent limitations in printed visualisations. These materials cannot fully convey the true scale experienced by a viewer on site. Furthermore, wireline drawings included within the same panoramic views share these constraints, as they remain technical renderings tied to the photographic basis and do not serve as independent corrections to visual perception. This acknowledgement underscores the need for cautious interpretation of visual evidence in assessing the proposed development's visual impact.

The development would introduce aviation and navigation lighting to a sea horizon that is presently unlit, permanently altering the character of the night-time seascape for the stated 35-year operational life. This change is significant because the current absence of such lighting contributes to the natural quality and tranquillity of the nocturnal seascape. Moreover, the operational lifespan does not limit the policy harm: consenting to this development effectively designates this seascape as appropriate for wind farm use, thereby accepting the permanent alteration of its night-time character. This has important implications for the protection of seascape qualities under relevant policy considerations.

The proposal fails to comply with the requirements set out in key planning policies designed to safeguard nationally important landscape and seascape interests. Specifically, the identified effects engage National Planning Framework 4 (NPF4) Policies 4(c) and 4(d), 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively establish a clear framework for the protection and sustainable management of such sensitive environments.

Despite this policy context, the applicant has not convincingly demonstrated that its conclusions regarding the scale of the accepted effects align with its own stated methodology. This gap undermines confidence in the assessment's reliability and casts doubt on the extent to which the proposal respects the integrity of the protected landscapes and seascapes. Without robust evidence to show adherence to the relevant policy criteria, the proposal cannot be regarded as compliant.

In light of these findings, it is concluded that the proposal does not meet the necessary policy standards for safeguarding nationally important landscape and seascape assets. Consequently, it should not be supported in its current form, as it fails to demonstrate the essential compliance required by the pertinent planning policies.

1.1.875 Cultural Landscape, Archaeology and Historic Environment

The practical consequence of the applicant's failure to properly apply the recognised methodology for assessing effects on the setting of historic assets is that the reliability of their conclusions regarding heritage impacts is fundamentally undermined. Although the applicant claims to have followed Historic Environment

Scotland's established approach, which emphasises evaluating how changes to setting affect the contribution that setting makes to an asset's cultural significance and whether the integrity of that setting is adequately retained, their assessment falls short of these requirements. Notably, the methodology explicitly advises against equating visual change directly with adverse impact, yet the applicant's report does not adequately demonstrate this critical distinction.

A detailed Methodological Audit, prepared independently in support of community objections and based solely on the applicant's Appendix 14.3, highlights that while the operational assessment identifies relevant heritage attributes, it fails to show how the integrity of setting has been assessed in accordance with the applicant's own accepted methodology. Instead, the assessment largely focuses on describing visual change—considering factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—before concluding that the integrity of setting remains intact. This approach omits the essential evaluative step required by the methodology, as none of the worked examples examined in the Audit demonstrate how the integrity of setting has been critically appraised beyond mere visual description.

In light of this, the applicant's assessment cannot be relied upon to provide a robust or methodologically sound evaluation of heritage impacts. The absence of a transparent and rigorous assessment of setting integrity calls into question the validity of the conclusions drawn and undermines confidence in the planning decision-making process. It is therefore essential that any determination of this application takes into account the methodological deficiencies identified and requires a reassessment that fully complies with the established Historic Environment Scotland methodology.

The practical consequence of overlooking the broader cultural landscape and experiential qualities in the heritage impact assessment is that the full significance of the affected assets may not be adequately understood or protected. The applicant's own baseline acknowledges that the cultural value arises not merely from individual monuments but from pilgrimage routes, arrival by sea, and the dynamic experience of moving through a living cultural landscape. This includes the interrelationships between monuments, spirituality, and the encompassing landscape and seascape, which are appreciated through movement rather than static viewpoints.

Despite this recognition, Historic Environment Scotland's consultation responses, as recorded in the application, highlight a shortfall in the assessment by requesting additional viewpoints to properly represent these wider qualities. This indicates that the applicant's evaluation may lack the necessary comprehensiveness to capture the full extent of cultural significance, thereby risking an incomplete understanding of heritage impacts. Such gaps could undermine the careful preservation of the heritage assets' experiential and contextual values.

The mitigation measures proposed rely heavily on the landscape assessment to inform the heritage impact conclusions. However, where landscape effects have been understated, as previously detailed, the heritage conclusions that depend on this assessment inevitably inherit the same understatement. This reliance raises concerns about the robustness of the conclusions drawn regarding heritage impacts.

Given that the landscape assessment forms the foundation for understanding the visual and experiential context of the heritage assets, any deficiency in its analysis risks distorting the perceived severity of effects on those assets. If the landscape impacts are underestimated, it follows that the consequent heritage impacts may not be fully appreciated or appropriately mitigated.

Therefore, the credibility of the heritage conclusions is undermined by the shortcomings in the landscape assessment. This interdependency suggests that a more rigorous and transparent evaluation of landscape effects is necessary to ensure that heritage impacts are accurately identified and effectively addressed.

The applicant's submission engages directly with the requirements of NPF4 Policy 7, specifically subsection (h) concerning scheduled monuments and subsections (c) and (d) relating to their setting, as well as Policy GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. These policies collectively mandate the protection of the cultural significance of heritage assets, particularly those of international and national importance, alongside careful consideration of their surrounding context.

However, the applicant has failed to demonstrate that the cultural significance of these heritage assets and their settings will be adequately safeguarded. Moreover, the Scottish Ministers have not been provided with the necessary assessment to support any such conclusion. This absence of critical evidence undermines the application's compliance with key heritage protection policies and calls into question its overall acceptability.

1.1.876 Effects on Island Communities, Tourism and the Local Economy

The island communities subject to this proposal exhibit an exceptional dependence on visitors, whose arrival is principally motivated by the very qualities identified within the applicant's baseline assessments: landscape, seascape, cultural heritage, tranquillity, and remoteness. These attributes constitute the core attractions that underpin the local tourism economy. Any alteration to these intrinsic qualities is therefore not merely an aesthetic or environmental concern but represents a direct threat to the fundamental economic structure of these communities.

The economic base supported by visitor expenditure sustains local services, underpins population retention, and ensures the ongoing viability of these island settlements. Disruption or degradation of the key qualities that attract visitors will have cascading effects, undermining service provision and jeopardising the social fabric and long-term sustainability of the islands. Thus, the proposal, by impacting these critical attributes, endangers the essential economic and social resilience of these communities.

The applicant's own consultants acknowledge habitability as a potentially significant pathway through which the proposal could impact island communities, yet no assessment of the habitability of these affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 operates at a regional scale, focusing in detail on potential port communities while failing to provide an equivalent place-based analysis of the island communities directly facing the development.

Despite this absence, the assessment concludes that these island communities exhibit low sensitivity to tourism effects.

This approach is fundamentally flawed, as small island economies are not accurately represented by regional averages. Their economies are highly concentrated in sectors most vulnerable to changes in the qualities that attract visitors. Moreover, reliance on increasing visitor numbers amplifies rather than mitigates this sensitivity, deepening economic dependence on the very attributes at risk. Therefore, the conclusion of low sensitivity, reached without any place-based analysis, lacks evidential basis and amounts to an unfounded assumption.

The proposal fails to demonstrate compliance with key policy and statutory requirements designed to protect island communities, thereby undermining the sustainability of those communities. Specifically, it neglects the obligations set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions must be founded on robust socio-economic evidence and adopt a precautionary approach when such evidence is insufficient. Moreover, the proposal does not accord with NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, both of which require that the interests of island communities be thoroughly assessed and afforded appropriate weight through meaningful engagement from the earliest stages of the development process through to its conclusion.

Critically, the applicant acknowledged that island communities warrant particular scrutiny; however, no adequate assessment has been undertaken to understand the potential impacts on these communities. The absence of such an assessment means that it has not been demonstrated that the proposal aligns with the principles of sustainable island communities. Consequently, the statutory duties owed to these communities have not been discharged, leaving a significant gap in compliance.

In summary, the failure to provide sound socio-economic evidence, to engage meaningfully with island communities throughout the process, and to meet statutory and policy obligations renders the proposal incompatible with the protection and sustainable development of island communities. This non-compliance fundamentally undermines the proposal’s acceptability in planning terms.

1.1.877 Ecology, Biodiversity and Habitats Regulations

The proposed development would bring extensive construction, operational, and decommissioning activities into an ecologically sensitive marine environment over a period of several decades. This prolonged disturbance has the potential to cause significant adverse effects on the Priority Marine Features and Annex I habitats located within the development area itself. Given the scale and duration of the project, the cumulative impacts on the local ecosystem warrant careful consideration.

The surrounding waters of the site are known to support a range of protected species, including seabirds, marine mammals, and basking sharks. These species rely on the area for essential life processes such as feeding, breeding, and migration. Any disruption to their habitat, whether through noise, water pollution, or physical presence, could have detrimental consequences for their populations, which may already be vulnerable.

In light of the ecological importance and sensitivity of both the site and its adjacent waters, it is imperative that the potential environmental effects of the proposed development are thoroughly assessed and mitigated. Failure to do so risks significant harm to nationally and internationally protected marine features and species. Consequently, the proposal should be reconsidered in view of these environmental constraints.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically aimed at the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are typically prepared in circumstances where an adverse effect on the integrity of a protected site cannot be definitively ruled out. Their inclusion in the application is therefore a notable aspect, reflecting the applicant's awareness of potential impacts.

By providing these documents, the applicant demonstrates recognition that there may be detrimental effects on protected species and habitats, and that these impacts require careful consideration under derogation provisions. The compensation plan indicates an intention to mitigate harm to the guillemot population, which is a key feature of the Special Protection Area in question. This approach suggests a proactive effort to address environmental concerns within the planning process.

Nevertheless, it is important to note that the submission of such derogation and compensation documents does not guarantee agreement on the absence of adverse effects. According to the applicant's own position, the Scottish Ministers may reach a different conclusion regarding the potential impact on site integrity. This uncertainty underscores the need for thorough assessment and cautious decision-making in respect of this application.

The legal framework governing developments affecting protected habitats is set out clearly under the Habitats Regulations. As established in the applicant's evidence, consent for such proposals may only be granted once the competent authority has ascertained that the integrity of the protected site will not be adversely affected, except in circumstances where the stringent derogation tests are satisfied. Crucially, the law requires that no reasonable scientific doubt remains regarding the absence of adverse effects before consent can be lawfully given. This places a significant evidential burden on the applicant, who must demonstrate beyond reasonable doubt that the statutory tests are met. Importantly, mitigation measures, compensation proposals, and commitments to future monitoring, while relevant to the overall assessment, do not in isolation suffice to prove compliance with these legal requirements.

This rigorous standard is supported and reinforced by relevant planning policies, including GEN 9 and GEN 13 of the National Marine Plan, alongside Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). Together, these policies embody the necessity for a high threshold of evidence and precaution in protecting designated habitats and species. The combined legal and policy framework thus ensures that any development proposals must provide robust and conclusive evidence that their implementation will not compromise protected sites, rather than relying solely on future promises or uncertain mitigation strategies.

In conclusion, given the exacting nature of these legal and policy requirements, any consent for development affecting protected habitats must be predicated on clear, definitive evidence demonstrating no adverse effect on site integrity. Without such evidence, and in the absence of fully satisfied derogation tests, approval would be inconsistent with both the Habitats Regulations and the relevant marine and planning policies.

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

1.1.878 Cumulative and In-Combination Effects

The current application addresses only a portion of the proposed development, excluding critical components such as the export cable corridor and onshore transmission works, which are essential for the wind farm's operation. This fragmented approach results in the effects of the entire project never being assessed collectively; instead, significant elements are deferred to future consenting processes. Such a method is inconsistent with established legal principles, as affirmed by the courts in Raeshaw Farms, which mandate that a project must be evaluated in its entirety rather than divided into smaller parts to diminish the apparent scale of individual impacts. Consequently, the assessment as presented is both legally and procedurally deficient, undermining a comprehensive understanding of the development's full implications.

While mitigation measures are often presented as sufficient to address individual development impacts, the reliability of the cumulative impact assessment itself is compromised by foundational flaws in baseline evaluations. Specifically, the cumulative assessments rely heavily on the conclusions of the Environmental Impact Assessment, which, as identified, understates effects across landscape, heritage, and socio-economic dimensions. This underestimation at the baseline level means that the combined effects of the proposed development alongside existing, consented, and foreseeable projects are likewise understated. Consequently, the cumulative impact assessment does not provide a robust or accurate reflection of the true scale of combined effects, thereby diminishing the effectiveness of mitigation strategies predicated on this assessment. In summary, the cumulative effects have been understated due to flawed baseline assessments, undermining confidence in the overall impact evaluation.

The assessment finds that the proposal fails to comply with the requirements set out in GEN 21 and paragraph 4.85 of the National Marine Plan, as well as NPF4 Policy 11(e), and the Environmental Impact Assessment Regulations concerning project splitting. The applicant has not satisfactorily demonstrated that the cumulative and

in-combination effects of the development have been reliably identified and assessed. Moreover, the effects of the project as a whole, including any deferred works, have not been adequately considered. It is therefore requested that the decision-making process explicitly addresses the treatment of these deferred works to ensure full compliance with relevant policies and regulatory obligations. In conclusion, without this comprehensive assessment, the proposal does not meet the necessary planning and environmental standards and should not be approved in its current form.

1.1.879 Public Engagement, Site Selection and Environmental Information

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

According to GEN 18 of the National Marine Plan and the principles of effective public participation enshrined in the Aarhus Convention, those affected must have a realistic opportunity to participate in decisions of this magnitude. The conditions under which the affected island communities have been required to respond fall short of this standard. It is therefore imperative that the Scottish Ministers bear these shortcomings firmly in mind when weighing the representations made, recognising that the legitimacy of the site-selection process is undermined by these deficiencies in public participation and consultation timing.

The Environmental Impact Assessment submitted with this application fails to provide sufficient information for the Scottish Ministers to make a fully informed decision. While the assessment identifies potential pathways to significant environmental effects across multiple topics, it does not investigate these impacts comprehensively. For example, the landscape assessment's conclusions rely on a distance-based pattern that is not supported by the methodology set out in its own documentation. Similarly, the heritage assessment lacks demonstrable application of its stated integrity test, and the socio-economic assessment omits any place-based analysis of the affected islands, undermining its robustness. Moreover, the applicant's dependence on future assessments, post-consent plans, ongoing monitoring, and subsequent approvals does not satisfy the requirements of the EIA Regulations, which mandate that likely significant effects must be understood prior to determination. It is imperative that the Scottish Ministers base their decision on the evidence currently before them, rather than on assumptions that unresolved matters will be adequately addressed at a later stage. Given these deficiencies, the applicant has not demonstrated that the environmental information submitted is adequate for the purposes of this application.

1.1.880 Effects on Local Area

There remains considerable uncertainty regarding the adequacy of the applicant's assessment of the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Although Islay and Colonsay lie closest to the development area—which extends over 448 square kilometres immediately north-west of Islay and west of Colonsay—the application primarily considers Islay in terms of its potential as a direct project location. This approach neglects a thorough place-based evaluation of the effects on Islay's Atlantic-facing communities, who confront the nearest edge of the development area and whose setting, economic activities, and community life are likely to be materially affected. Similarly, for Colonsay and Oronsay, the seaward outlook integral to daily life directly faces the proposed array. The North Colonsay and Western Cliffs Special Protection Area, forming Colonsay's coastline, is central to the applicant's derogation case and compensation plan, implicitly acknowledging that harm to the internationally protected seabird population of these cliffs cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance within this community, is subject to the same deficiencies identified elsewhere in the heritage assessment, particularly concerning the appraisal of its open maritime setting. Taken together, these points demonstrate that the applicant's evaluation underestimates the potential adverse impacts on these island communities and their heritage assets, thereby undermining the reliability of the overall environmental and heritage impact assessment.

While the applicant acknowledges some significant effects on Iona, particularly in terms of visibility and community impact, their assessment appears to underestimate the scale and importance of these effects when compared to established mitigation benchmarks. The Coastal Character assessment designates the Sound of Iona as having high sensitivity, with direct orientation towards the development and extensive visibility. It notes a large geographical extent of change, encompassing approximately 21 kilometres, with turbines spanning around 39 degrees of the horizon, resulting in a moderate and significant overall effect. This level of impact surpasses typical thresholds where mitigation measures are expected to be robust and comprehensive.

Moreover, the applicant's recognition of significant effects on residents and visitors across much of the island, including at Dùn Ì—the highest point on Iona—does not fully account for the island's exceptional heritage context. Iona's monastic landscape, comprising the Abbey, the Nunnery, and the high crosses, holds international significance, intrinsically linked to pilgrimage routes, sea arrival, and movement through the landscape. Despite Historic Environment Scotland's request for additional viewpoints, such as from the ferry crossing and elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, these visualisations are absent from the applicant's submission. This omission limits a comprehensive understanding of the potential heritage impacts, thereby undermining the thoroughness of the environmental and social impact evaluation.

Community concern further highlights the shortcomings of the applicant's assessment. A household consultation on Iona revealed that 92 per cent of respondents oppose the proposal. Notably, habitability—a pathway of potential effect identified by the applicant's own consultants—remains unassessed. The perceived scale of the development is considerable; for context, Ben Hynish on Tiree, a familiar

landmark standing 141 metres high and visible from Iona at about 33 kilometres, would be overtopped by the largest turbines by approximately 194 metres at roughly two-thirds of that distance. This comparison underscores the significant visual intrusion likely to be experienced. Taken together, these points suggest that the applicant's evaluation does not fully capture the magnitude of impacts on Iona, indicating a need for a more detailed and nuanced assessment to inform decision-making.

While the applicant acknowledges significant effects on certain areas and communities within Mull and Ross of Mull, such as Erraid, the Core Paths of the Ross, and Fionnphort—the latter being a critical gateway for visitors to Iona—their assessment relies heavily on distance-based mitigation assumptions that warrant closer scrutiny. For example, the Ross of Mull South coastal area is rightly identified as having High sensitivity at distances of approximately 22 to 24 kilometres, with effects attributed as Medium magnitude. However, the applicant's acceptance of significant effects in these zones contrasts with the treatment of more distant areas such as the Wilderness and Gribun Rocks coastal area, where, despite the High sensitivity classification of the Loch na Keal National Scenic Area (spanning 21 to 33 kilometres), the magnitude of effect is judged to be no more than Medium. This approach underplays the cumulative and perceptual impacts on the wider landscape.

Moreover, the applicant's assessment omits place-based analysis for communities that rely heavily on the unspoiled Atlantic seascape, including those dependent on the west-facing tourism economy, wildlife boat operations, and accommodation services in the western townships of Mull. The proposed development's industrialisation of this seascape threatens to undermine the natural qualities upon which these communities depend, yet they are not explicitly evaluated within the assessment. The reliance on viewing distance as a primary determinant of impact magnitude fails to capture the nuanced economic and social dependencies tied to these landscapes and seascapes.

In conclusion, while some mitigation is acknowledged by the applicant, the assessment inadequately addresses the significant visual, economic, and community impacts on Mull and Ross of Mull's designated landscapes and tourism-dependent communities. The approach, focused on distance-based reasoning, does not sufficiently reflect the sensitivities or the interlinked nature of these coastal environments and their associated human activities.

The applicant's assessment recognises the presence of several designated landscapes within the wider seaboard area, including Ulva, Staffa, Jura, and the Scarba, Lunga and the Garvellachs National Scenic Areas, but it appears to underestimate or overlook key impacts on these sensitive locations. Ulva, situated within the Loch na Keal National Scenic Area, is identified as a community-owned island at the outset of its regeneration, characterised by a small, re-establishing population whose recovery is intrinsically linked to the unspoilt seascape and setting that the development threatens. Notably, no specific assessment of effects on Ulva has been undertaken, which is a significant omission given the island's reliance on these natural qualities for its social and cultural revival. Similarly, Staffa, one of Europe's most celebrated small islands within the same National Scenic Area and located approximately 35 kilometres from the development site, falls outside the

applicant's assessment boundary of 30 kilometres recommended by NatureScot. Despite acknowledging Staffa's panoramic maritime qualities, the applicant concludes that the scale of change would be small and the effects not significant, a position that fails to fully account for the island's celebrated status and the sensitivity of its landscape.

Further concerns arise from the treatment of the Jura National Scenic Area, positioned roughly 28 to 32 kilometres from the development, where the applicant assigns a High sensitivity but limits the magnitude of impact to Medium to Low on the basis of distance, apparent scale, and retained landforms. This assessment appears insufficient, given that the designation of Jura's landscape rests fundamentally on its wild and undeveloped Atlantic outlook, which could be compromised by the proposed development. A similar approach is taken towards the Scarba, Lunga and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres away, receiving the same calibrated assessment despite its sensitive status. Taken together, these evaluations suggest a pattern of underestimating or omitting significant effects on important designated landscapes and vulnerable island communities, thereby undermining the protection of their natural and cultural qualities. This calls into question the robustness of the applicant's assessment and indicates a need for a more comprehensive and sensitive evaluation of the wider seaboard impacts.

The applicant's Environmental Statement assesses the South Tiree coastal area, situated approximately 35 kilometres from the proposed development, as having High sensitivity but attributes a Low magnitude of change to the effects on this landscape. This combination underpins their overall evaluation of the impact on Tiree's coastal character.

However, Tiree's landscape is uniquely defined by its exceptionally low-lying topography, with the highest point, Ben Hynish, reaching only 141 metres. The island's character derives from the dominance of sea and sky and an open oceanic horizon. Introducing turbines of up to 335 metres in height would result in vertical elements unprecedented in the seascape. Such large-scale structures would fundamentally alter the visual and experiential qualities of the landscape.

Given this context, the conclusion of a Low magnitude of change appears to significantly understate the true extent of impact on Tiree's sensitive and distinctive landscape character. This understatement calls into question the reliability of the applicant's assessment, which fails to fully reflect the magnitude of change likely to be experienced by this highly sensitive receptor.

While the applicant's assessment acknowledges certain mitigation measures based on distance-related factors, these do not adequately address the significant effects experienced by mainland and island communities with direct visual and economic connections to the seascape. Notably, the community-owned island of Gigha, renowned as a national symbol of island regeneration following its purchase by local residents, lies to the east of the proposed development. The assessment fails to consider the implications for Gigha's finely balanced community and economy, which are closely intertwined with the surrounding waters. Similarly, Ardnamurchan Point—the most westerly tip of the British mainland—offers panoramic views along the

Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the sensitive receptors that the applicant's distance-based mitigation approach inadequately moderates. Moreover, the west coast of Kintyre encompasses a series of communities whose identity, character, and visitor economy are fundamentally shaped by their outlook towards the open Atlantic seaboard, including views towards Islay, Jura, and the wider surrounding waters. The Treshnish Isles and other adjacent small islands and mainland coasts share this direct visual relationship with the development site. Taken together, the omission of these receptors from the assessment undermines the comprehensiveness and reliability of the applicant's evaluation of potential effects. It is therefore essential that a more thorough and inclusive appraisal be undertaken to fully understand and address the likely impacts on these sensitive mainland and island communities.

The applicant's environmental impact assessment applies a distance-based methodology that systematically moderates and discounts effects on sensitive receptors located beyond approximately 20 kilometres from the development site. This approach effectively reduces the assessed magnitude of change and diminishes the perceived significance of impacts at these greater distances. When compared to standard mitigation practices, which require thorough and place-specific evaluations regardless of distance, the applicant's methodology falls short by not adequately capturing or addressing the full extent of environmental consequences experienced by distant communities.

Taken together, the evidence demonstrates a clear and concerning pattern: wherever a highly sensitive receptor lies beyond the 20-kilometre threshold, the assessment attenuates the magnitude of impact without conducting a detailed, place-based analysis. Consequently, the communities residing in these areas receive no specific assessment of the effects they endure, undermining the integrity and comprehensiveness of the environmental impact assessment. This systematic discounting of significant effects beyond 20 kilometres fails to meet the necessary standards for a robust and equitable evaluation of environmental impacts.

1.1.881 Personal Observations

In addition to the planning matters above, I am personally concerned because: I am an American tourist recently returned from Scotland. This land is fragile and uniquely placed to invite transformative interactions with the land itself. There is no returning to a "before" if this project is put in place in such a fragile ecosystem that supports the lives of the community based on tourism. The seas will be decimated. The bird populations will be destroyed. The freedom to experience an extended unblemished horizon that speaks of centuries of travel and culture will be obliterated. The land itself will become a thing resting in the armpit of these monstrous turbines. The people who live in these communities will lose their livelihood as we tourists navigate to unblemished sites that maintain beauty and the natural diversity of flora and fauna. These turbines will not be "neutral objects" in this wild Hebridean space and the pristine sacred life of this culture will be permanently dismembered. I will personally not return to this area only to be exposed to this wall of leviathans

Based on my own local knowledge, I also wish to highlight that: The local bird populations are already suffering and declining. In particular, the puffin community is

but a mere representation of their colony two decades ago. These turbines will interrupt their feeding and flight patterns and will most likely contribute to the determination of their colony. The whale migrations are already interrupted by seagoing vessels, and now these structures will provide yet another barrier to their freedom of the seas. I am concerned that these large wind turbines will also interrupt normal weather patterns to have the potential to create their own climate patterns similar to those observed on top of mountains disrupting the land, the people, and the creatures who migrate between the various islands off of these seas

Finally, I would also ask the Scottish Ministers to consider: I am concerned that this is yet another Goliath corporation, reaping profits from the land, and the people with no intent of providing value or support to an amazing land, to a spectacular culture, and the communities that support each other. What is the actual benefit of this project? I see no real benefit that these communities will be gaining from sacrificing their seas to this project

1.1.882 Further Comments

The impact of this project on the local environment will be devastating over time. The impact on the livelihood of the people in these communities as they lose their resources and access to a livelihood based on tourism will take time to measure, but by then the damage will be done. I am a tourist and I have met many people in these communities, and I have heard their stories. I only recently fell in love with Scotland and I’m feeling the heartbreak and the anxiety of these new friends of mine.

1.1.883 Summary

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

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to reject the associated marine licence application. Should the Ministers be inclined not to refuse consent outright, I request that they mandate the provision of further environmental information alongside enhanced visualisations. I further propose that determination of the applications be deferred until after a public inquiry, enabling a thorough examination of the issues raised in this objection. Regardless of the decision reached, I ask that the Ministers explicitly address and record their conclusions regarding the project’s effects on cultural heritage and the impacted island communities within their formal reasons.

Yours faithfully,

[Redacted]

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

Member of the public 593
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, corresponding to application numbers 00012385 for consent under section 36 of the Electricity Act 1989, alongside application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. I request that this objection be officially recorded, that I be acknowledged as an objector, and that I receive notification of the determinations relating to these applications.

The development under consideration entails the construction of an offshore wind farm with an installed capacity of approximately 2 gigawatts. It would encompass between 91 and 144 turbines, each reaching a maximum blade tip height of 335 metres. The designated Windfarm Development Area spans roughly 448 square kilometres of marine environment situated northwest of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in proximity to the islands and coastal settlements within the southern Hebrides.

This objection is founded upon the planning and environmental grounds delineated by the relevant statutory and policy framework governing the determination of such applications. It is imperative to emphasise that the onus lies with MachairWind Limited (ScottishPower Renewables) to establish, through robust and sufficient evidence, that all applicable tests and criteria have been satisfied. Objectors bear no obligation to substantiate contrary claims. Upon careful consideration, it is apparent that the applicant has not met this evidential burden, and accordingly, the applications should be refused consent.

1.1.884 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989, which require the applicant to have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. The evidence confirms that the applicant has not adequately addressed these requirements nor taken reasonable steps to mitigate adverse effects arising from the proposal on these protected interests. Furthermore, the Scottish Ministers, in determining this application, are mandated to have regard to the same statutory duties. The absence of demonstrated compliance, coupled with identified deficiencies and omissions in the application's consideration of these statutory obligations, constitutes a clear conflict with the applicable legal and policy framework. Such failures weigh decisively against the granting of consent.

The marine licence application must be determined under Part 4 of the Marine (Scotland) Act 2010 and in accordance with Scotland's National Marine Plan, as set out in the applicant's evidence (S01). The relevant General Policies include GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts). Compliance with

these policies is a statutory requirement forming part of the assessment of the application.

The evidence confirms that where compliance with these policies has not been demonstrated, or where deficiencies, omissions, or conflicts with the legal and policy framework exist, these matters must weigh against granting consent (S01). In this case, the application fails to demonstrate compliance with the statutory requirements and relevant National Marine Plan policies. The absence of adequate evidence to satisfy the policies on sound evidence (GEN 19), cumulative impacts (GEN 21), and engagement (GEN 18) is particularly notable. Furthermore, the application does not adequately address the protection of the historic environment (GEN 6), natural heritage (GEN 9), or landscape and national scenic areas (GEN 7), as required by the Plan.

Given these unresolved deficiencies and the failure to meet the statutory policy tests, the marine licence application does not comply with the Marine (Scotland) Act 2010 or the National Marine Plan. Consequently, the application should be refused.

The proposal fails to demonstrate compliance with the mitigation requirements set out in National Planning Framework 4 (NPF4), specifically in relation to biodiversity, natural places, historic assets, and energy policies. This failure is critical and weighs decisively against the granting of consent.

NPF4 is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. The proposal engages key policies within NPF4, notably Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy). However, the submitted evidence does not establish adherence to these policies. There are clear deficiencies and omissions in the application of these policies, and the proposal conflicts with the applicable legal and policy framework.

Policy 3 requires the protection and enhancement of biodiversity, yet the proposal lacks sufficient evidence to demonstrate that biodiversity will be maintained or improved. Similarly, Policy 4 mandates the safeguarding of natural places, but the proposal fails to provide adequate measures to ensure their protection. Policy 7 demands the conservation of historic assets and places, yet the proposal does not satisfactorily address potential adverse impacts on such assets. Finally, Policy 11 on energy requires compliance with energy efficiency and sustainability standards, which the proposal does not convincingly meet.

Where compliance with these policies has not been demonstrated, and where evidence identifies deficiencies, omissions, or conflicts with the statutory and policy framework, these factors must be given significant weight against the proposal. Accordingly, the failure to comply with NPF4’s key policies on biodiversity, natural places, historic assets, and energy constitutes a fundamental planning objection to this application.

The proposal fails to meet the fundamental legal requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which mandate that the likely

significant environmental effects of any development must be identified, assessed, and reported prior to determination. The submitted documentation does not provide a comprehensive or adequate environmental impact assessment as required by these regulations. This omission undermines the decision-making process by leaving the determining authority without a full understanding of the potential environmental consequences. Without this essential assessment, the proposal cannot be considered compliant with the statutory framework designed to safeguard environmental interests.

Furthermore, the proposal does not satisfy the obligations under the Habitats Regulations, which require a thorough assessment of the effects on European protected sites in accordance with the applicable statutory tests. The absence of a demonstrably compliant habitats regulations assessment means that the potential impacts on protected habitats and species have not been properly evaluated or mitigated. This failure constitutes a clear conflict with the legal and policy framework governing protected sites. As established, where compliance with these statutory requirements has not been demonstrated, or where deficiencies and omissions are evident, such matters must weigh decisively against the granting of consent. Therefore, the application should be refused on the grounds of inadequate environmental impact assessment and non-compliance with habitats regulations.

The proposal under consideration fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be properly considered and given due weight in the decision-making process. This statutory obligation is clear and unambiguous, as set out in the Act itself, and is a critical component of the legal and policy framework governing developments affecting island areas.

A detailed examination of the submitted documentation reveals significant deficiencies and omissions in how the proposal addresses these statutory requirements. There is no substantive evidence that the interests of the relevant island communities have been adequately identified, assessed, or incorporated into the planning rationale. The absence of such consideration constitutes a failure to meet the explicit duties imposed by the Islands (Scotland) Act 2018.

Furthermore, the lack of demonstrable compliance with this legislative requirement is not a minor procedural oversight but a fundamental flaw that directly conflicts with the applicable legal framework. As established by the Act and reinforced by planning policy, where compliance cannot be shown, or where evidence highlights such deficiencies, these factors must weigh against the granting of planning consent.

In conclusion, the proposal does not satisfy the statutory duty to consider and give due weight to the interests of island communities as required by the Islands (Scotland) Act 2018. This failure represents a material conflict with the legal and policy framework and accordingly constitutes a compelling reason to refuse consent.

The applicant bears the responsibility of demonstrating, through robust, objective and proportionate evidence, that every relevant statutory duty, planning policy and environmental assessment requirement has been satisfied. This evidential burden is

fundamental to the proper determination of the application and ensures that all legal and policy frameworks are fully complied with before consent is granted.

In this case, the applicant has failed to demonstrate compliance with all applicable requirements. Where compliance has not been demonstrated, or where the evidence identifies deficiencies, omissions or conflicts with the applicable legal and policy framework, those matters weigh against the granting of consent. Given these shortcomings, the application does not meet the necessary evidential standards and should be refused.

1.1.885 Conflict with National Planning Framework 4 and the Development Plan

While NPF4 Policy 11 endorses renewable energy development, this support is conditional upon compliance with its specified impact criteria, notably those set out in Policies 11(c), 11(d), and 11(e), which address effects on communities, landscapes, seascapes, and other receptors. The proposal under consideration fails to meet these critical requirements. It would result in significant adverse impacts on nationally designated landscapes and seascapes, undermining the intrinsic values these areas possess. Furthermore, the proposal does not satisfactorily demonstrate that the cultural significance of scheduled monuments and their surrounding settings would be preserved. Equally, there is insufficient evidence to confirm that the interests and wellbeing of island communities would be adequately safeguarded. Lastly, the ecological assessments submitted do not establish that the necessary environmental tests can be satisfied. Taken together, these shortcomings signify that the proposal is in clear conflict with the impact criteria set out in NPF4 Policy 11, thereby weakening the policy's intended support for renewable energy development.

The proposal fails to comply with multiple policies within the National Planning Framework 4 that protect nationally important landscapes, heritage assets, and biodiversity. Policy 11 operates in conjunction with Policy 4(c) and 4(d), which safeguard National Scenic Areas and nationally important landscapes from significant adverse effects on their designated qualities; Policy 7, including 7(h) concerning scheduled monuments and 7(c) and 7(d) relating to the setting of historic assets; and Policy 3 on biodiversity. The submitted evidence demonstrates that the proposal would result in significant adverse impacts on nationally designated landscapes and seascapes. Furthermore, it has not been shown that the cultural significance of scheduled monuments and their settings would be preserved, nor that island communities would be adequately protected. Additionally, the ecological assessments required under Policy 3 have not been satisfactorily met. Taken together, these failures establish clear conflicts with the relevant NPF4 policies intended to safeguard designated assets.

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

Therefore, it must be concluded that the proposal is inconsistent with the relevant terrestrial development plan policies.

1.1.886 Seascape, Landscape and Visual Effects

The applicant's assessment methodology lacks a clear distance threshold for ceasing major effects, yet evidence indicates that no highly sensitive receptor beyond approximately 20 kilometres is attributed the highest magnitude of change, regardless of sensitivity or visibility. Their own documents acknowledge distance as a key factor: areas over 30 kilometres away are judged to experience only small-scale change, with high magnitude effects confined to within about 20 kilometres, medium effects between 20 and 30 kilometres, and low effects beyond 30 kilometres for certain landscape types. This systematic moderation of magnitude at distances where the most sensitive designated landscapes are located results in understated inputs to the protective tests. Consequently, the conclusions drawn do not reliably represent the true effects that the Scottish Ministers are being asked to consider.

The applicant relies on NatureScot's visualisation guidance, which explicitly recognises inherent limitations in printed visualisations. These materials cannot fully convey the true scale experienced by a viewer on site. Furthermore, wireline drawings included within the same panoramic views share these constraints, as they remain technical renderings tied to the photographic basis and do not serve as independent corrections to visual perception. This acknowledgement underscores the need for cautious interpretation of visual evidence in assessing the proposed development's visual impact.

The proposed development would introduce aviation and navigation lighting to a currently unlit sea horizon, resulting in a permanent alteration to the character of the night-time seascape throughout the stated 35-year operational life. This change represents a significant modification to the visual environment, as the existing natural darkness of the seascape would be replaced by artificial illumination that is visible from surrounding areas. The introduction of such lighting not only alters the aesthetic qualities of the seascape but also establishes a new baseline condition for the area's nocturnal character during the lifetime of the project.

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

There remains significant uncertainty regarding the proposal's adherence to the relevant planning policies designed to safeguard landscape and seascape interests. Although certain effects have been identified, the applicant has failed to convincingly demonstrate that their conclusions on the scale of these effects align with their own

stated methodology. This inconsistency raises doubts about the reliability of the environmental assessments presented.

Furthermore, the proposal does not adequately demonstrate compliance with policies protecting nationally important landscapes and seascapes, specifically those set out in NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. In light of these shortcomings, the proposal cannot be considered consistent with the necessary policy framework and should not be supported.

1.1.887 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment purports to follow Historic Environment Scotland's recognised methodology for evaluating effects on the setting of historic assets, a framework that necessitates a careful evaluation of how changes to setting influence the contribution that setting makes to an asset's cultural significance. This methodology, developed through consultation with Historic Environment Scotland, explicitly distinguishes between mere visual change and adverse impact, emphasising that visual alterations alone should not be equated directly with harm. Crucially, it requires an assessment of whether the integrity of the setting is adequately retained, ensuring that any conclusions drawn about heritage impacts rest on a rigorous evaluative process rather than descriptive observations.

However, a Methodological Audit prepared to support community objections, utilising only the applicant's Appendix 14.3, finds that although the operational assessment identifies relevant heritage attributes, it fails to demonstrate that the integrity of setting has been assessed in accordance with the applicant's own accepted methodology. The assessment's narrative focuses predominantly on visual factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation before concluding that the integrity of setting remains intact. This represents a critical omission, as the required evaluative step—linking these observations explicitly to the retention or loss of setting integrity—is absent in all the worked examples examined by the Audit. Consequently, the reliability of the applicant's conclusions about heritage impacts is fundamentally undermined.

The practical consequence of the applicant's current heritage assessment is that it risks underrepresenting the full extent of cultural impacts arising from the proposed development. This is because the baseline acknowledges that the affected heritage assets derive their significance not only from static features but from experiential qualities such as pilgrimage routes, arrival by sea, and movement through a living cultural landscape. The relationships between monuments, the sense of spirituality, and the connection to the surrounding landscape and seascape are integral to understanding the heritage value, and these qualities are experienced dynamically rather than from fixed viewpoints.

The applicant's methodology, however, appears to rely predominantly on conventional fixed viewpoints, which may fail to capture this broader cultural landscape and the sequential experience of the heritage assets. This limitation was highlighted by Historic Environment Scotland in their consultation responses, which are recorded within the application documentation. They specifically requested

additional viewpoints to ensure that the wider experiential qualities and the interconnectedness of the heritage assets are properly represented in the assessment process.

In light of this, it is essential that the heritage impact assessment is expanded to incorporate these broader cultural and experiential dimensions. Without this, the assessment cannot fully inform decision-makers of the potential harm to the cultural significance that derives from movement and relationships within the landscape, thereby compromising the ability to appropriately mitigate or avoid adverse effects. A more comprehensive approach would better safeguard the holistic heritage values identified in the baseline and ensure the planning process respects the full character of the affected assets.

The heritage impact conclusions presented in the application are fundamentally reliant on the findings of the accompanying landscape assessment. This dependency is critical, as the evaluation of heritage effects draws directly from the characterisation and magnitude of landscape changes identified. Where the landscape assessment has understated potential effects, as has been demonstrated earlier, the heritage conclusions necessarily reflect that same understatement.

Such an approach raises concerns regarding the robustness and credibility of the heritage assessment. If the baseline understanding of landscape effects is incomplete or insufficiently rigorous, the subsequent heritage impact analysis, which is built upon this foundation, cannot be considered fully reliable. This interconnectedness means that any deficiencies or oversights in the landscape appraisal propagate through to the heritage conclusions, thereby undermining their validity.

Accordingly, a reassessment that addresses the identified shortcomings in the landscape evaluation is essential to ensure that heritage impacts are accurately characterised. Without rectifying these issues, the heritage conclusions remain compromised, limiting their usefulness for informed decision-making within the planning process. It is therefore necessary that the heritage assessment is revisited in light of a more comprehensive and precise landscape appraisal.

The application fails to demonstrate compliance with NPF4 Policy 7, specifically subsections (h) concerning scheduled monuments and (c) and (d) regarding their setting, as well as GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Critically, the applicant has not provided the necessary assessment to show that the cultural significance of internationally and nationally important heritage assets and their settings would be safeguarded. Consequently, the Scottish Ministers lack the evidence required to conclude that these heritage assets would be protected. On this basis, the proposal does not meet key policy requirements for heritage protection and should therefore be refused.

1.1.888 Effects on Island Communities, Tourism and the Local Economy

The proposal poses a direct threat to the fundamental economic and social sustainability of the island communities in question by undermining the very qualities that attract visitors. These communities rely exceptionally heavily on visitors, who are

drawn by attributes explicitly identified in the applicant's own baseline assessments: landscape, seascape, cultural heritage, tranquillity, and remoteness. Any alteration to these intrinsic qualities would strike at the core of the islands' economic foundation, which in turn supports essential local services, sustains population levels, and ensures the long-term viability of these communities. Consequently, the proposed development jeopardises the enduring welfare and resilience of the island populations by diminishing the visitor appeal upon which they depend.

In considering the adequacy of the applicant's socio-economic assessment of impacts on island communities, it is instructive to compare the thoroughness of the analysis applied to port communities with that directed towards the islands themselves. The assessment in Chapter 18 offers a detailed examination of potential effects on port communities, reflecting a place-based approach that acknowledges their particular circumstances. However, this level of scrutiny is not extended to the island communities directly facing the development, where the assessment remains at a broad regional scale. This inconsistency raises concerns about the reliability of the conclusions drawn, particularly regarding the sensitivity of island communities to tourism-related changes.

The applicant's own consultants highlight habitability as a potentially significant pathway through which the proposal could affect island communities. Despite this recognition, no specific assessment of the habitability of the islands was conducted. Instead, the socio-economic evaluation concludes that the island communities exhibit low sensitivity to tourism effects, a determination reached without any place-based analysis. Such an approach overlooks the distinctive characteristics of small island economies, which are markedly different from regional averages. These economies are heavily reliant on sectors that are directly influenced by the qualities attracting visitors. Consequently, increasing visitor numbers do not mitigate sensitivity; rather, they amplify the communities' dependence on attributes that may be vulnerable to change.

Given these considerations, the conclusion of low sensitivity for island communities appears unfounded and is better characterised as an assumption rather than evidence-based. The absence of a tailored, place-specific socio-economic assessment undermines confidence in the applicant's methodology and its capacity to understand or mitigate impacts on island communities adequately. It would be prudent for the assessment to incorporate detailed, island-focused analysis to ensure that the particular vulnerabilities and dependencies of these communities are fully recognised and addressed in the planning process.

While mitigation measures have been proposed, they fall short when compared to the specific requirements set out for island communities under current policy and statutory duties. The proposal fails to meet the standards of GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions be founded on robust socio-economic evidence and a precautionary approach where evidence is insufficient. Furthermore, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 require that the interests of island communities are thoroughly assessed and given meaningful weight through engagement from the earliest stages to completion. The applicant has acknowledged the need for particular scrutiny of island communities but has not undertaken the necessary assessments to understand the potential

effects on these populations. As a result, it has not demonstrated compatibility with sustainable island communities, nor has it discharged the statutory duties owed to them. This fundamental omission undermines the proposal's compliance with essential planning and legal requirements.

1.1.889 Ecology, Biodiversity and Habitats Regulations

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

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

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

The applicant has provided a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically addressing the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are customarily prepared when it is not possible to exclude adverse effects on the integrity of a protected site. Their inclusion in the submission is therefore a notable aspect of the application, indicating that the applicant acknowledges potential impacts that may arise.

This approach reflects an understanding that the Scottish Ministers may ultimately reach a different conclusion regarding the likelihood of adverse effects on the protected site's integrity. By submitting these derogation and compensation measures, the applicant demonstrates a proactive stance aimed at addressing any such impacts in accordance with the derogation provisions. This recognition and corresponding documentation are integral to the assessment of the application's compliance with relevant environmental protections.

Developers must recognise that consent for projects potentially impacting protected habitats cannot be granted unless it is conclusively demonstrated that there will be no adverse effect on the integrity of the designated site. The legal framework, as established under the Habitats Regulations, imposes a high evidential threshold: consent is lawful only if no reasonable scientific doubt remains regarding the absence of harm. This places the onus squarely on the applicant to provide robust evidence. Importantly, proposals relying solely on mitigation, compensation measures, or future monitoring fail to satisfy these statutory requirements.

This strict approach is further reinforced by relevant planning policies, including GEN 9 and GEN 13 of the National Marine Plan, alongside NPF4 Policies 3, 4(b), 4(e), and 4(f). Together, these establish a comprehensive policy context that echoes the imperative of protecting sensitive habitats and species. Accordingly, any application must not only meet the legal criteria but also align with these policy standards to secure consent, underscoring the necessity for rigorous scientific evidence from the outset.

The applicant’s submitted evidence, notably their own derogation documents, fails to establish that the statutory tests designed to protect internationally important habitats and species have been satisfied. These documents reveal significant uncertainty regarding the potential impacts on these ecological features, undermining the applicant’s position that the legal requirements for such protections are met. The statutory framework demands a clear demonstration that all relevant tests are fulfilled before consent can be granted, yet this essential threshold has not been reached based on the information provided.

This lack of demonstrable compliance with statutory safeguards calls into question the validity of the application as it currently stands. Without satisfying these legal protections, there is insufficient justification to proceed with granting consent, given the potential for harm to internationally significant ecological assets. Consequently, the application should not be approved until the applicant can conclusively show that all statutory tests protecting these habitats and species are fully met.

1.1.890 Cumulative and In-Combination Effects

The current approach to assessing the project is fundamentally flawed because it only considers a portion of the development before the Scottish Ministers, while deferring critical components such as the export cable corridor and the onshore transmission works to later applications. These deferred elements are essential for the operation of the wind farm, yet their impacts are not evaluated alongside the principal works. This fragmented assessment results in the effects of the entire project never being examined collectively. Such piecemeal consideration undermines the integrity of the planning process and conflicts with established legal principles. Notably, the courts in Raeshaw Farms have affirmed that a project must be assessed in its entirety rather than being artificially divided into smaller parts to downplay the overall impact. Consequently, the current method of separating key elements into subsequent consenting processes after the main decision has been made is contrary to this principle. In summary, the incomplete project assessment arising from deferred elements is both legally and procedurally unsound, preventing a comprehensive evaluation of the project's full effects.

The cumulative impact assessment presented in the Environmental Impact Assessment relies heavily on the findings of the individual landscape, heritage, and socio-economic assessments. As these foundational assessments have been demonstrated to understate the magnitude of effects, the cumulative assessment consequently adopts this diminished baseline. This approach inherently compromises the reliability of the cumulative impact conclusions.

When the baseline against which cumulative effects are measured is reduced, the combined effects of the proposal alongside other existing, consented, and foreseeable developments are similarly underestimated. This means that the cumulative assessment does not fully capture the true extent of potential harm or change that may arise from the collective development activity within the area. The resulting analysis thus provides an incomplete and potentially misleading picture of the overall environmental and social impacts.

Given that the cumulative assessment is predicated on these flawed baseline assessments, there is a clear risk that decision-makers and stakeholders are not presented with a sufficiently robust understanding of the combined implications. It is therefore essential that the baseline assessments are revisited and accurately reflect the actual conditions to ensure that cumulative effects are properly evaluated and appropriately addressed within the planning process.

The applicant's submission engages directly with the requirements set out under GEN 21 and paragraph 4.85 of the National Marine Plan, alongside Policy 11(e) of the National Planning Framework 4 (NPF4), as well as the Environmental Impact Assessment (EIA) Regulations concerning project splitting. Despite these clear statutory and policy frameworks, the application fails to provide adequate demonstration that the cumulative and in-combination effects of the development proposal have been comprehensively identified and assessed. Furthermore, the assessment does not satisfactorily address the overall effects of the project in its entirety. This omission is significant given the legal and policy emphasis on ensuring that all elements of a project, including those that may be deferred or implemented subsequently, are considered holistically to avoid underestimation of environmental impacts.

In particular, there is an evident lack of explicit consideration regarding the deferred works within the project's environmental and planning assessment. Such deferred components may contribute materially to cumulative environmental effects and thus must be expressly evaluated as part of the decision-making process. Without this thorough and transparent appraisal, the application does not comply with the relevant planning policies and regulatory requirements designed to prevent project splitting and ensure robust environmental governance. It is therefore essential that the decision-making authority requires the applicant to explicitly address the treatment of deferred works, thereby ensuring full compliance with the National Marine Plan, NPF4, and the EIA Regulations, and enabling a properly informed determination of the proposal.

1.1.891 Public Engagement, Site Selection and Environmental Information

The consultation process associated with the site-selection and planning application stages has demonstrably failed to meet the requisite standards for effective public participation. The applicant requests that Scottish Ministers attribute significant weight to the site-selection process; however, the deficiencies in public involvement at both the plan and site-selection phases have persisted into the application stage. Notably, the application documentation comprises many thousands of pages of technical material, presenting a substantial challenge for meaningful engagement. Moreover, the consultation period coincided with the busiest months for island

communities, a time when residents are continuously occupied with the visitor season and access to specialist advice is at its lowest. This timing disparity is particularly significant given that the applicant has had years, along with substantial professional and financial resources, to prepare its case, contrasting sharply with the limited capacity of affected communities to respond effectively.

National Marine Plan policy GEN 18, alongside the principles of effective public participation enshrined in the Aarhus Convention, explicitly require that those affected by decisions of this magnitude have a realistic and fair opportunity to engage. The conditions under which the local communities were expected to participate have fallen short of this standard, undermining the legitimacy and robustness of the consultation process. It is therefore essential that Ministers give careful and critical consideration to these shortcomings when evaluating the representations submitted, recognising that inadequate public participation has materially impacted the legitimacy of the site-selection and application processes.

The Environmental Impact Assessment submitted in support of this application is insufficient for the Scottish Ministers to make an informed decision. While the assessment is extensive in scope, its adequacy is fundamentally compromised across several key topics. For example, the landscape assessment purports to identify significant effects but relies on a distance-based outcome pattern that its own methodology does not support. Similarly, the heritage assessment fails to demonstrate the application of its stated integrity test, undermining confidence in its conclusions. The socio-economic assessment is also deficient, notably lacking any place-based analysis of the islands directly affected by the proposal.

Moreover, the application frequently depends on future assessments, post-consent plans, monitoring regimes, and additional approvals to address matters that should be resolved at this stage. This approach conflicts with the requirements of the EIA Regulations, which mandate that likely significant environmental effects be fully understood prior to determination. The Scottish Ministers are bound to make their decision based on the evidence currently before them, not on the assumption that outstanding issues will be satisfactorily addressed later.

In light of these considerations, the applicant has not demonstrated that the environmental information provided is adequate for the purposes of determination. Therefore, the Environmental Impact Assessment as submitted fails to meet the necessary standards, and the application should not be approved on the basis of incomplete and insufficient environmental information.

1.1.892 Effects on Local Area

There remains considerable uncertainty regarding the adequacy of the applicant’s assessment of the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Although Islay and Colonsay lie closest to the development area—which extends over 448 square kilometres immediately north-west of Islay and west of Colonsay—the application primarily considers Islay in terms of its potential as a direct project location. This approach neglects a thorough place-based evaluation of the effects on Islay’s Atlantic-facing communities, who confront the nearest edge of the development area and whose setting, economic

activities, and community life are likely to be materially affected. Similarly, for Colonsay and Oronsay, the seaward outlook integral to daily life directly faces the proposed array. The North Colonsay and Western Cliffs Special Protection Area, forming Colonsay's coastline, is central to the applicant's derogation case and compensation plan, implicitly acknowledging that harm to the internationally protected seabird population of these cliffs cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance within this community, is subject to the same deficiencies identified elsewhere in the heritage assessment, particularly concerning the appraisal of its open maritime setting. Taken together, these points demonstrate that the applicant's evaluation underestimates the potential adverse impacts on these island communities and their heritage assets, thereby undermining the reliability of the overall environmental and heritage impact assessment.

The applicant's assessment significantly underestimates the scale and importance of visual, community, and heritage impacts on Iona, leading to an incomplete evaluation of environmental and social consequences. The Coastal Character assessment identifies the Sound of Iona as having high sensitivity, with a direct orientation towards the development area and extensive visibility. The geographical extent of change is large, with turbines visible across approximately 39 degrees of the horizon at a distance of about 21 kilometres, producing a moderate and significant overall effect. Similarly, the West Coast of Iona is highly sensitive with widespread visibility, and the applicant acknowledges significant effects for residents and visitors throughout much of the island, including at Dùn Ì, Iona's highest point.

Iona's monastic landscape, comprising the Abbey, the Nunnery, and the high crosses, holds heritage of international importance. The applicant's baseline recognises the significance of pilgrimage, arrival by sea, and movement through the landscape to this heritage. Historic Environment Scotland requested additional viewpoints, including one from the ferry crossing itself, but no visualisation has been provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, a notable omission given the heritage sensitivity. Community concerns are also profound: a household consultation revealed that 92 per cent of respondents on Iona object to the proposal. Despite the applicant's consultants identifying habitability as a potential pathway of effect on this community, no assessment of this factor has been undertaken.

To contextualise the perceived scale of visual impact, the largest turbines would be approximately 194 metres taller than Ben Hynish on Tiree, a familiar landmark standing 141 metres high and visible from Iona at about 33 kilometres. The turbines would be two-thirds of that distance away yet dominate the skyline. This comparison underscores the significant underestimation in the applicant's visual impact assessment.

In conclusion, the applicant's evaluation fails to fully capture the extensive and significant effects on Iona's sensitive landscapes, heritage assets, and community wellbeing, thereby compromising the accuracy and reliability of the environmental and social impact assessment.

The practical consequence of the applicant's visual impact assessment is a significant underestimation of the effects on the communities and landscapes of Mull and the Ross of Mull. For example, the Ross of Mull South coastal area, assessed as having high sensitivity at distances of approximately 22 to 24 kilometres, is attributed only medium magnitude effects despite the applicant's acknowledgement of significant impacts at Erraid and on Core Paths. Notably, Fionnphort—the gateway to Iona and the primary embarkation point for visitors—is recognised by the applicant as significantly affected. This community, heavily reliant on the flow of tourists, faces direct adverse consequences that have not been adequately accounted for in the assessment.

Moreover, across Mull, significant effects are accepted on Core Paths and within the Central, South, and West Mull Local Landscape Areas, while the Loch na Keal National Scenic Area—characterised by high sensitivity at distances of 21 to 33 kilometres—is attributed no more than medium magnitude impacts. This approach extends to the Wilderness and Gribun Rocks coastal area, where effects are dismissed as small purely on the basis of viewing distances exceeding 30 kilometres. Such distance-based reasoning overlooks the importance of these landscapes to Mull's west-facing tourism economy, including wildlife boat operations and accommodation providers that rely on the Atlantic seascape. Crucially, none of these communities has received a place-based assessment, resulting in an incomplete understanding of the development's industrialising effect on this sensitive coastal environment.

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

Further concerns arise regarding other significant islands within the same National Scenic Area. Staffa, one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development site—beyond the 30 kilometre limit to which NatureScot recommended assessing effects on National Scenic Area qualities. The applicant concludes that any changes at Staffa would be small and not significant, a judgment that appears inconsistent with their own acceptance of the island's panoramic maritime qualities. Similarly, the Jura National Scenic Area, recognised for its wild and undeveloped Atlantic character, is assessed as having only Medium to Low magnitude effects despite its High sensitivity and proximity of 28 to 32 kilometres. This moderation is attributed to distance and retained landforms, yet it fails to adequately reflect the intrinsic value of Jura's outlook that underpins its designation.

The same approach applies to the Scarba, Lunga and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres away, which is treated with similar caution. Taken together, these assessments reveal a pattern of

underestimation that risks compromising the natural and cultural qualities of these wider seaboard landscapes and island communities. The omission of thorough evaluation, particularly for sensitive and recovering communities like Ulva, undermines the protection intended by their designations and raises serious concerns about the adequacy of the applicant's environmental and cultural considerations.

The applicant's assessment concludes a Low magnitude of change on the South Tiree coastal area despite recognising its High sensitivity at approximately 35 kilometres distance. This practical conclusion severely understates the true extent of the impact on Tiree's landscape, resulting in an unreliable evaluation that could misinform decision-making and undermine effective mitigation.

Tiree's landscape character is exceptionally distinctive, defined by its low-lying terrain and the dominance of sea and sky. The island's highest point, Ben Hynish, rises to just 141 metres, reinforcing an open oceanic horizon free from vertical intrusions. Introducing turbines reaching up to 335 metres would represent a dramatic departure from this established seascape character, creating unprecedented vertical structures that would be highly conspicuous and discordant.

Given the fundamental role that openness and horizontality play in defining Tiree's landscape, the applicant's Low magnitude conclusion for such an exposed and sensitive receptor is fundamentally flawed. It significantly understates the magnitude of change and impact, thereby compromising the reliability of the assessment and the planning process that depends upon it.

The applicant's assessment has not addressed significant effects on several mainland and island communities that have direct views of the proposed development and whose local economies depend on the seascape in question. For example, Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by residents, faces the development site from the east. Despite its finely balanced community and economy, the potential impacts on Gigha have not been examined. Similarly, Ardnamurchan Point, the westernmost point of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas represent precisely the receptors for which the applicant's distance-based moderation approach is applied, raising concerns that the visual and economic effects here have been underestimated. Furthermore, the west coast of Kintyre encompasses a series of communities whose outlook, character and visitor economy are intrinsically linked to the open Atlantic seaboard facing Islay, Jura and the surrounding waters. The Treshnish Isles and other small islands and mainland coasts with views towards the development area similarly share this position and have not been adequately considered. Collectively, these omissions compromise the comprehensiveness of the applicant's assessment by failing to fully evaluate the potential impacts on communities that are both visually and economically connected to the seascape in question.

The applicant's reliance on a distance-based approach results in a systematic underestimation and discounting of significant effects on sensitive receptors located beyond 20 kilometres. This methodology leads to the practical consequence that

highly sensitive receptors beyond this threshold experience a moderated magnitude of change in the assessment, effectively diminishing the recognised effect. Furthermore, the communities residing in these areas have not been subject to any place-based assessment, leaving their specific circumstances and sensitivities unaddressed. Taken together, these factors undermine the integrity of the environmental impact assessment by failing to adequately recognise and evaluate the full extent of potential impacts on receptors at greater distances. It is therefore concluded that the applicant’s approach is insufficient and does not provide a comprehensive or reliable basis for environmental decision-making.

1.1.893 Personal Observations

In addition to the planning matters above, I am personally concerned because: I'm an American. Why would I want to travel to Scotland to see windmills? I would go for natural beauty, wildlife, and history. I do not want my children or my grandchildren or the children of the Scottish people to lose this beautiful part of their world.

Based on my own local knowledge, I also wish to highlight that: Can't it be all of them? They are all precious and unique.

Finally, I would also ask the Scottish Ministers to consider: Don't do this to Scotland. Please.

1.1.894 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy requirements governing its determination. Notably, the applicant’s own evaluations acknowledge considerable impacts on nationally designated landscapes, as well as on the local communities and heritage of the coastline. Independent examination of the applicant’s documents reveals that these impacts have been understated. Crucially, the necessary heritage assessment has not been conducted, and although the effects on island communities were identified, no corresponding evaluation has been undertaken. Furthermore, the ecological criteria required by relevant legislation have not been demonstrated as achievable. It is also pertinent that only a portion of the project is currently before the Scottish Ministers for consideration.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to withhold the associated marine licence. Should the Ministers consider it inappropriate to refuse outright, I request that they mandate the submission of additional environmental information and enhanced visualisations. Moreover, I advocate that the applications be determined only following a public inquiry, which would allow a thorough examination of the issues raised in this objection. Regardless of the final decision, I ask that the Ministers explicitly address the impacts on cultural heritage and the affected island communities within their stated reasons.

Yours faithfully,

[Redacted]

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

Member of the public 594
Dear Sir/Madam,

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

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

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

1.1.895 Legislative and Policy Framework

The application fails to demonstrate adequate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989. This Schedule mandates that the applicant must have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, as well as protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant is required to take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The evidence before the determining authority does not establish that these obligations have been satisfactorily addressed.

Given that the Scottish Ministers are also required to have regard to these statutory duties in determining the application, the failure to demonstrate compliance constitutes a significant deficiency. Where such compliance is not shown, or where evidence reveals omissions or conflicts with the applicable legal and policy framework, these factors weigh decisively against the granting of consent. Accordingly, the application should be refused on the basis that it does not meet the statutory requirements of Schedule 9 of the Electricity Act 1989.

The marine licence application is subject to determination under Part 4 of the Marine (Scotland) Act 2010, which mandates that authorisation decisions must align with

Scotland's National Marine Plan unless relevant considerations indicate otherwise. The National Marine Plan's General Policies of particular relevance to this proposal include GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts). Compliance with these policies is an integral part of the statutory assessment of the application.

The evidence before the determining authority does not demonstrate compliance with these statutory requirements and relevant policies. Specifically, there are deficiencies and omissions in the application that fail to satisfy the standards set out in the National Marine Plan. The absence of adequate evidence addressing co-existence with other marine users, the historic environment, landscape and national scenic areas, natural heritage, and cumulative impacts undermines the statutory assessment process. Furthermore, the application lacks sufficient engagement records and sound evidence as required by GEN 18 and GEN 19, respectively.

Given these shortcomings, the application conflicts with the applicable legal and policy framework. As established, where compliance has not been demonstrated or where evidence identifies such deficiencies and omissions, these matters weigh against the granting of consent.

In conclusion, the marine licence application fails to meet the statutory requirements under the Marine (Scotland) Act 2010 and does not comply with the relevant policies of Scotland's National Marine Plan. Therefore, the application should be refused on these grounds.

The proposal fails to comply with key policies of National Planning Framework 4 (NPF4), which is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. Specifically, the application does not demonstrate compliance with Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy), all of which are directly engaged by this proposal.

Policy 3 requires that developments protect and enhance biodiversity, yet the submitted evidence does not confirm that biodiversity interests will be maintained or improved. Policy 4 mandates the safeguarding of natural places, but the proposal lacks sufficient demonstration that natural habitats and landscapes will be preserved in accordance with this policy. Policy 7 obliges the protection of historic assets and places, yet the application fails to provide adequate evidence that historic environment considerations have been properly addressed or that heritage assets will be conserved. Finally, Policy 11 on energy requires adherence to standards that promote sustainable energy use and efficiency, but the proposal does not establish conformity with these requirements.

Where compliance with these policies has not been demonstrated, or where the evidence identifies deficiencies, omissions, or conflicts with the applicable legal and policy framework, these matters weigh decisively against the granting of consent. Given the absence of satisfactory evidence to meet the requirements of NPF4

policies 3, 4, 7, and 11, the proposal is contrary to the statutory and policy framework governing this development.

In conclusion, the failure to demonstrate compliance with the relevant policies of National Planning Framework 4, combined with identified deficiencies and omissions, provides a clear basis for refusal of planning permission. The proposal does not meet the necessary legal and policy standards and therefore should not be granted consent.

The proposal fails to comply with the statutory requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which mandate that the likely significant environmental effects of the development must be identified, assessed, and reported prior to any determination. This failure to provide an adequate environmental impact assessment undermines the decision-making process by leaving the determining authority without a comprehensive understanding of the potential environmental consequences. Without this essential information, the proposal cannot be properly evaluated against the legal and policy framework designed to protect the environment, thereby rendering any consent premature and procedurally flawed.

Furthermore, the proposal does not demonstrate compliance with the Habitats Regulations, which require a thorough assessment of the effects on European protected sites in accordance with the applicable statutory tests. The absence of such an assessment, or any evidence that these tests have been satisfactorily met, constitutes a significant omission that conflicts directly with the legal obligations imposed by the Habitats Regulations. Given that compliance has not been demonstrated and deficiencies remain unaddressed, these failures weigh decisively against the granting of consent. The proposal’s shortcomings in meeting these critical environmental safeguards represent a fundamental breach of statutory duties and must result in refusal.

The proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018, resulting in a fundamental procedural and substantive deficiency. This statutory requirement is clear: the interests of island communities must be explicitly taken into account and given due weight throughout the decision-making process. The absence of demonstrated compliance with this obligation undermines the legitimacy of the proposal and its conformity with the legal framework governing development affecting island areas.

The evidence confirms that the application does not meet the standards set by the Islands (Scotland) Act 2018. There is a lack of adequate assessment or meaningful engagement with the specific needs, characteristics, and priorities of the island communities impacted by the development. Such omissions constitute a failure to satisfy the statutory duty, which is not a mere procedural formality but a substantive requirement designed to protect the unique social, economic, and environmental interests of island populations. This failure is a material consideration that weighs decisively against the granting of planning consent.

In accordance with established legal and policy principles, where compliance with the Islands (Scotland) Act 2018 has not been demonstrated, or where evidence

reveals deficiencies or omissions in addressing island community interests, these shortcomings must be regarded as significant and determinative. The proposal's disregard for this statutory duty conflicts with the applicable legal and policy framework and therefore should be refused consent. Granting permission in these circumstances would set a precedent that undermines the statutory protections afforded to island communities and contravenes the clear legislative intent of the Islands (Scotland) Act 2018.

The application fails to dispel fundamental uncertainty regarding compliance with the full spectrum of statutory duties, planning policies, and environmental assessment requirements. The applicant has not provided robust, objective, and proportionate evidence to demonstrate that every relevant legal and policy obligation has been met, leaving critical gaps in the evidential record.

Given these unresolved deficiencies and omissions, the application does not satisfy the evidential burden incumbent upon the applicant. In accordance with established principles, such failures weigh decisively against the granting of consent. The absence of demonstrated compliance with all applicable frameworks mandates refusal.

1.1.896 Conflict with National Planning Framework 4 and the Development Plan

The proposal would result in significant adverse effects on nationally designated landscapes and seascapes, failing to meet the impact criteria set out in National Planning Framework 4 (NPF4) Policy 11. This policy supports renewable energy development only insofar as the associated impacts on communities, landscapes, seascapes, and other receptors are adequately addressed, as detailed in criteria 11(c), 11(d), and 11(e). However, the evidence submitted does not demonstrate that these criteria are satisfied in this case.

Furthermore, the proposal does not adequately protect the cultural significance of scheduled monuments and their settings, nor does it ensure the safeguarding of island communities. The ecological requirements prescribed by the policy have also not been shown to be capable of being met based on the submitted evidence. Taken together, these deficiencies establish a clear conflict with the impact criteria of NPF4 Policy 11, thereby undermining the policy's support for the development in question.

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

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

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

The proposal would result in significant adverse effects on the landscape, heritage, and community interests within the area governed by the Argyll and Bute Local Development Plan 2. These impacts are material to the terrestrial development plan framework and would undermine the objectives set out to protect these valued attributes. The extent of harm identified is sufficient to demonstrate clear conflict with the relevant policies that seek to safeguard the character and integrity of the local environment.

This incompatibility extends beyond the local development plan to the broader strategic context, including the National Planning Framework 4, which must be read as a whole. The proposal fails to align with the overarching national and local policy intentions, as it does not adequately address or mitigate the detrimental effects identified. The applicant has not provided evidence to demonstrate that these conflicts have been resolved or sufficiently mitigated, leaving the adverse impacts unaddressed.

In conclusion, the proposal is fundamentally at odds with the terrestrial development plan framework relevant to land-based effects, particularly the Argyll and Bute Local Development Plan 2. Given the quantified adverse impacts on landscape, heritage, and community interests, and the absence of any compelling justification or effective mitigation, the proposal should be refused planning permission on the basis of these policy conflicts.

1.1.897 Seascape, Landscape and Visual Effects

The applicant’s assessment methodology, as set out in Appendix 16.1, notably lacks a defined distance threshold beyond which major effects are considered to cease. Nevertheless, an independent Evidence Note, analysing the applicant’s Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern across all three assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of its inherent sensitivity or the extent of visibility. This pattern is further corroborated by the applicant’s own documentation, which acknowledges the influence of distance on judgements—highlighting, for example, that a coastal area over 30 kilometres away is assessed as experiencing only a small scale of change. The Landscape Character synthesis similarly identifies a High magnitude of effect within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types.

Such a methodological approach results in the protective tests being applied to understated inputs. By systematically moderating magnitude at precisely those distances where the most sensitive designated landscapes are situated, the assessment’s conclusions fail to provide a reliable description of the effects the

Scottish Ministers are asked to consider. Consequently, there is a significant concern that the current methodology does not accurately capture the true extent of potential impacts on sensitive receptors, undermining the robustness of the decision-making process.

The applicant's evidence draws on NatureScot's visualisation guidance, which recognises inherent limitations in the use of printed visual materials to represent proposed developments. Specifically, it is acknowledged that such visualisations cannot fully replicate the scale as perceived by a viewer on site. This fundamental constraint affects the reliability of visual assessments that depend on photographic panoramas.

Furthermore, wireline drawings incorporated within these panoramic projections carry similar limitations. As noted, they are technical renderings integrated within the visualisation process rather than independent tools that might correct or enhance the photographic images. This means they do not provide an objective or definitive measure of visual impact but rather serve as an adjunct to the photographic evidence.

Taken together, these points suggest that visualisation materials, while useful, have technical and perceptual shortcomings that should be carefully considered in the assessment process. The reliance on such materials must be balanced with an understanding of their constraints to ensure that conclusions drawn about visual effects are appropriately qualified.

The introduction of aviation and navigation lighting as part of the proposed development would result in a permanent alteration to the night-time seascape, which is currently unlit. This change would persist for the entirety of the stated 35-year operational period, significantly modifying the visual character of the sea horizon during night hours. Such a transformation would be readily perceptible and may affect the qualities that currently define this coastal environment after dark.

Beyond the immediate practical impact, the decision to consent to the development carries a wider policy implication. Granting permission signals that the seascape is considered appropriate for wind farm use despite the acknowledged harm caused by lighting and its effect on the night-time character. This represents a broader acceptance of change to the seascape's intrinsic qualities, not limited to the operational lifespan but indicative of the long-term characterisation of the area within planning policy considerations.

The proposal's failure to adequately address the scale of its impacts on landscape and seascape interests results in non-compliance with key planning policies, thereby undermining the protection afforded to nationally important areas. This practical shortcoming means that the development risks causing unacceptable harm to these valued environments, contrary to the guiding principles set out in national policy frameworks.

Specifically, the effects of the proposal engage multiple provisions, including NPF4 Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively seek to safeguard the

integrity and character of significant landscapes and seascapes from adverse development impacts. The applicant has not demonstrated that its assessment of the scale of these effects aligns with the methodology it employed, creating uncertainty and undermining confidence in the conclusions presented.

Given this lack of demonstrated compliance, the proposal cannot be considered to meet the statutory requirements for protecting nationally important landscapes and seascapes. It follows that the application should be refused on the grounds of failing to satisfy relevant planning policies designed to preserve these environmental assets for the benefit of current and future generations.

1.1.898 Cultural Landscape, Archaeology and Historic Environment

The practical consequence of the applicant's assessment approach is a fundamental uncertainty regarding the true impact of the proposed development on the heritage assets' setting. While the applicant claims to follow Historic Environment Scotland's established methodology, which explicitly requires evaluating how changes affect the contribution of setting to cultural significance and whether the integrity of setting is maintained, their assessment falls short of this standard. The methodology clearly distinguishes between mere visual change and adverse impact, emphasising the need for a careful evaluative judgment rather than a simple description of what is seen.

A detailed Methodological Audit, prepared independently on behalf of community objectors and relying solely on the applicant's Appendix 14.3, reveals that the assessment identifies relevant heritage attributes such as visibility, distance, monument prominence, retained views, screening, and skyline occupation. However, it fails to demonstrate the critical evaluative step mandated by the methodology, namely an explicit assessment of whether the integrity of the setting is indeed retained. Instead, the report stops at describing visual effects and then asserts compliance with the integrity test without showing the reasoning or evidence supporting this conclusion.

This omission undermines the reliability and transparency of the applicant's heritage impact conclusions. Without a clear demonstration that the integrity of setting has been properly assessed and confirmed in accordance with the accepted methodology, decision-makers and stakeholders cannot be confident that the heritage significance has been adequately protected. It is therefore essential that the assessment be revisited to include a robust evaluative analysis consistent with the recognised Historic Environment Scotland approach before any weight is placed on its findings.

The applicant's own baseline assessment acknowledges that the cultural significance of the heritage assets affected by the proposal is derived from a complex interplay of qualities. These include elements such as pilgrimage routes, arrival by sea, and the experience of movement through a living cultural landscape. Furthermore, the significance arises from the relationships between monuments, spirituality, and the surrounding landscape and seascape. Importantly, this significance is understood to be experienced dynamically, through movement, rather than from fixed viewpoints alone.

Despite this recognition, Historic Environment Scotland's consultation responses—also recorded within the application—highlight a concern that the assessment may not fully capture these broader experiential qualities. They specifically requested the inclusion of additional viewpoints to ensure that the wider cultural landscape and its associated values are properly represented in the heritage impact appraisal. This suggests that the assessment, as presented, may inadequately reflect the full baseline qualities and cultural significance of the heritage assets in question, potentially leading to an incomplete understanding of the proposal's impacts.

The heritage conclusions presented rely significantly on the landscape assessment. As noted in the evidence, where the landscape effects have been understated, the resulting heritage conclusions inherently reflect this understatement. This dependency indicates that any deficiencies in accurately assessing landscape impacts directly compromise the credibility and reliability of the heritage impact findings. Consequently, the heritage conclusions must be viewed with caution, as their foundation in an inadequate landscape assessment weakens their overall validity.

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

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

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

1.1.899 Effects on Island Communities, Tourism and the Local Economy

The proposal poses a serious threat to the fundamental economic and social sustainability of the island communities concerned. These communities rely to an exceptional degree on visitors, whose arrival is motivated precisely by the qualities identified in the applicant's own baseline assessments: the landscape, seascape, cultural heritage, tranquillity, and remoteness of the area. Any changes to these defining characteristics would directly undermine the economic base of these communities. This economic harm would, in turn, affect essential local services, reduce population retention and growth, and jeopardise the ongoing viability of the communities themselves. In light of these factors, the proposal should be viewed as incompatible with the long-term sustainability of the island communities it would impact.

The applicant's own consultants acknowledged that habitability represents a potentially significant pathway through which the proposed development could affect island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 focuses predominantly on regional-level analysis, providing detailed consideration of potential port communities, but omitting any equivalent place-based examination of the island communities that would be directly impacted. Nonetheless, this assessment concludes that those island communities are of low sensitivity to tourism-related effects.

It is important to recognise that small island economies cannot be accurately represented by regional averages. These economies tend to be highly concentrated in sectors that are particularly vulnerable to alterations in the qualities which attract visitors. Moreover, a dependence on increasing visitor numbers does not mitigate this sensitivity; rather, it amplifies the reliance on the very attributes that may be jeopardised by the development. Consequently, the conclusion that island communities exhibit low sensitivity, reached without a detailed place-specific analysis, cannot be regarded as evidence-based but must be seen as an unsubstantiated assumption.

Given the absence of a thorough and place-based socio-economic evaluation of the island communities, the applicant's methodology appears flawed and insufficient for understanding or mitigating potential impacts on these sensitive populations. A more nuanced and locally focused assessment is necessary to ensure that the unique characteristics and vulnerabilities of island economies are fully considered in the planning process.

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

In this context, the applicant has not demonstrated that the proposal is compatible with the sustainability of island communities, nor has it evidenced compliance with the statutory duties owed to these populations. The failure to undertake the necessary socio-economic assessment and to engage meaningfully with island stakeholders undermines the soundness of the proposal under the relevant planning policies and statutory instruments. Consequently, the proposal falls short of the required standards for assessing and protecting island communities, warranting refusal on the basis of non-compliance with established policy and statutory duties.

1.1.900 Ecology, Biodiversity and Habitats Regulations

The proposed development would bring extensive construction, operational, and decommissioning activities into an ecologically sensitive environment for a prolonged period of decades. Priority Marine Features and Annex I habitats are present within the development site itself, while the surrounding waters provide habitat for seabirds, marine mammals, and basking sharks. This concentration of protected species and habitats underlines the ecological importance of the area and indicates a high potential for significant adverse environmental effects resulting from the scale and duration of the proposed works. Given these considerations, the potential for ecological harm must be carefully weighed against the benefits of the development.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are typically prepared in circumstances where an adverse effect on the integrity of a protected site cannot be definitively ruled out. Their inclusion in the application package signals a recognition by the applicant of potential environmental impacts that may arise, necessitating mitigation and compensation measures to address any harm caused.

This approach implicitly acknowledges that the applicant's own assessment does not preclude the possibility that Scottish Ministers might reach a different conclusion regarding adverse effects on the protected site. Therefore, the submission of these documents serves not only as a demonstration of intent to manage and compensate for potential impacts but also as a procedural safeguard within the derogation framework. It reflects the applicant's awareness of the sensitivity of the site and the need to provide robust evidence to support any necessary derogation from conservation objectives.

The practical consequence of the stringent legal and policy framework under the Habitats Regulations is that planning consent for developments potentially affecting protected habitats and species can only be granted if it is conclusively demonstrated that the integrity of the protected site will not be adversely affected. This requirement mandates that no reasonable scientific doubt remains regarding the proposal's impact. The onus lies squarely with the applicant to provide robust evidence to satisfy this high standard. Importantly, mitigation, compensation measures, and proposals for future monitoring alone cannot substantiate compliance with the statutory tests. This rigorous approach is embedded not only in the Habitats Regulations but also reflected in GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. Collectively, these provisions ensure that environmental protection is paramount and that consent is withheld unless the legal and policy conditions are unequivocally met.

The applicant's own derogation documents, as submitted in support of the application, indicate a significant degree of uncertainty regarding the satisfaction of the statutory tests designed to protect internationally important habitats and species. The evidence clearly shows that the applicant has not provided sufficient assurance that these legal requirements will be met. This lack of demonstrable compliance raises serious concerns about the potential for harm to ecological features of international significance.

Given the paramount importance of these statutory protections, the failure to establish that the tests can be satisfied fundamentally undermines the justification for granting consent. Without clear evidence that the legal thresholds have been met, approval of the application would be inconsistent with the obligation to safeguard internationally important ecological assets. Therefore, the application should be refused on the grounds of non-compliance with the requisite statutory environmental safeguards.

1.1.901 Cumulative and In-Combination Effects

The applicant's evidence clearly demonstrates that only a portion of the project is currently before the Scottish Ministers, with critical components such as the export cable corridor and onshore transmission works deferred to future applications. These elements are indispensable for the operation of the wind farm, yet their impacts are not assessed in conjunction with the main development proposal. This segmentation prevents a comprehensive evaluation of the project's overall effects, as the cumulative impacts will be considered piecemeal through separate consenting processes that follow the principal decision. Such an approach is fundamentally flawed both legally and procedurally, as it contradicts the established principle, upheld in the Raeshaw Farms case, that a project must be assessed in its entirety rather than being artificially divided into smaller parts whose individual impacts may seem less significant. Consequently, the current assessment method undermines the integrity of the decision-making process by failing to provide a holistic understanding of the project's true environmental and planning implications.

When considering mitigation measures, it is important to recognise that the cumulative impact assessment relies heavily on baseline data derived from preceding landscape, heritage, and socio-economic evaluations. These foundational assessments have been demonstrated to understate certain effects, thereby affecting the accuracy of mitigation strategies predicated on them. As a result, the effectiveness of proposed mitigation may be overestimated due to an incomplete understanding of the true baseline conditions.

Furthermore, because the cumulative assessment is constructed upon these understated baseline conclusions, it inherently begins from a diminished reference point. This means that the combined effects of the current proposal, when considered alongside other existing, consented, and foreseeable developments, are likely to be underestimated. The cumulative impact, therefore, may be more significant than the assessment suggests, potentially leading to inadequate planning responses.

In summary, the reliability of the cumulative impact assessment is compromised by the foundational underestimations within the initial assessments. Without addressing these baseline flaws, the true scale of combined effects cannot be accurately captured, and the resulting mitigation and planning decisions may fail to fully account for the totality of impacts. It is essential that these baseline issues are rectified to ensure a robust and credible cumulative impact evaluation.

In comparison to the requirements set out in GEN 21, paragraph 4.85 of the National Marine Plan, and NPF4 Policy 11(e), the applicant's submission falls short in

adequately addressing the mitigation of cumulative and in-combination effects arising from the proposal. The Environmental Impact Assessment Regulations explicitly require that project splitting be avoided to ensure a comprehensive evaluation of all effects associated with a project. However, the applicant has failed to demonstrate that these effects, particularly those stemming from the project as a whole, have been reliably identified and thoroughly assessed. This lack of clarity undermines confidence in the mitigation measures proposed and raises concerns about the potential for unaddressed environmental impacts.

Furthermore, the treatment of deferred works has not been expressly addressed in the application or supporting documentation. Given that these deferred components could significantly influence the overall environmental outcomes, their omission from the assessment contravenes established planning and environmental policy requirements. It is imperative that the decision-making process explicitly considers the cumulative implications of both the current proposal and any associated deferred works to ensure compliance with relevant policies and regulations. Without such consideration, the determination would be incomplete and potentially non-compliant with the statutory framework.

1.1.902 Public Engagement, Site Selection and Environmental Information

The applicant invites Scottish Ministers to attribute significant weight to the site-selection process; however, this process has been fundamentally compromised by deficiencies in public participation. The consultation accompanying the application encompasses many thousands of pages of highly technical material, yet the consultation period coincided with the busiest months for island communities. During this peak visitor season, residents are engaged in continuous work, and access to specialist advice is severely limited. In stark contrast, the applicant has benefited from years of preparation supported by substantial professional and financial resources. This imbalance has effectively restricted the capacity of the affected communities to engage meaningfully with the proposals.

National policy and international principles underscore the necessity for effective public participation in decisions of such magnitude. GEN 18 of the National Marine Plan, alongside the Aarhus Convention’s requirements, mandates that those impacted must have a realistic and fair opportunity to contribute to the decision-making process. The conditions under which the local communities have been expected to respond fall short of this standard, undermining the legitimacy of the consultation. It is therefore imperative that Ministers recognise these shortcomings in participation when considering the representations submitted, as the quality and timing of public engagement bear directly on the integrity of the entire site-selection process.

The Environmental Impact Assessment submitted with this application fails to provide sufficient information for the Scottish Ministers to make a fully informed decision. While the assessment identifies potential pathways to significant environmental effects across multiple topics, it does not investigate these impacts comprehensively. For example, the landscape assessment’s conclusions rely on a distance-based pattern that is not supported by the methodology set out in its own documentation. Similarly, the heritage assessment lacks demonstrable application of

its stated integrity test, and the socio-economic assessment omits any place-based analysis of the affected islands, undermining its robustness. Moreover, the applicant's dependence on future assessments, post-consent plans, ongoing monitoring, and subsequent approvals does not satisfy the requirements of the EIA Regulations, which mandate that likely significant effects must be understood prior to determination. It is imperative that the Scottish Ministers base their decision on the evidence currently before them, rather than on assumptions that unresolved matters will be adequately addressed at a later stage. Given these deficiencies, the applicant has not demonstrated that the environmental information submitted is adequate for the purposes of this application.

1.1.903 Effects on Local Area

The applicant's assessment significantly underestimates the direct and substantial effects of the proposed development on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Although Islay and Colonsay lie immediately adjacent to the development area—Islay to the south-east and Colonsay to the east—the application predominantly considers Islay only as a potential project location rather than as a distinct island community subject to direct impacts. This approach fails to recognise that Islay's Atlantic-facing communities confront the nearest edge of a 448 square kilometre development zone, without any place-specific evaluation of consequences for their local setting, economic activities, or community life. Similarly, Colonsay and Oronsay's daily experience is defined by their seaward outlook facing the array directly. The North Colonsay and Western Cliffs Special Protection Area, located on Colonsay's coastline, forms the focus of the applicant's derogation case and compensation proposals, implicitly acknowledging that harm to the internationally protected seabird populations cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance situated within this community, has its open maritime setting inadequately addressed, reflecting the broader deficiencies identified in the heritage assessment. These omissions collectively undermine the reliability and completeness of the environmental and heritage impact evaluation.

The practical consequence of the applicant's assessment is a substantial underestimation of the visual and social impacts on Iona, which affects the reliability of the environmental and social impact evaluation. The Coastal Character assessment clearly identifies the Sound of Iona as having high sensitivity, with direct orientation towards the proposed development and extensive visibility. The turbines would be visible across a large geographical area, approximately 21 kilometres away, spanning about 39 degrees of the horizon. This significant visual intrusion extends to the West Coast of Iona, also recognised as highly sensitive with widespread visibility. The applicant concedes that residents and visitors throughout much of the island, including those at Dùn Ì—its highest point—would experience significant effects. Notably, the scale of the turbines is considerable when compared to familiar landmarks; for instance, the tallest turbines would exceed Ben Hynish on Tiree, a 141-metre high landmark seen from Iona at 33 kilometres, by around 194 metres despite being visible at only two-thirds of that distance.

Furthermore, the assessment fails to adequately account for Iona's internationally important monastic heritage, which is intrinsically linked to pilgrimage, arrival by sea,

and landscape movement. Historic Environment Scotland's request for additional visualisations, including viewpoints from the ferry crossing and elevated ground such as Càrn Cùl ri Èirinn above St Columba's Bay, has not been met, leaving a critical gap in understanding the heritage impact. Community perspectives further highlight this shortfall: a household consultation revealed that 92 per cent of respondents on Iona oppose the proposal. Despite this, the applicant's own consultants identified habitability as a potential pathway for impact on the community, yet no assessment of this has been undertaken. Taken together, these omissions and understatements compromise the accuracy of the overall impact evaluation and raise serious concerns about the adequacy of the applicant's approach.

The applicant's assessment acknowledges significant effects on several key coastal communities and landscapes of Mull and the Ross of Mull, yet the scope and depth of this evaluation remain insufficient to fully capture the scale and nature of the potential impacts. Specifically, the Ross of Mull South coastal area is recognised as having High sensitivity at distances of approximately 22 to 24 kilometres, with effects attributed a Medium magnitude. The applicant concedes significant impacts at Erraid and on the Core Paths of the Ross, as well as at Fionnphort, which serves as the gateway to Iona and the principal embarkation point for visitors. This location is notably the community most directly linked to the flow of visitors, whose experience the applicant admits would be significantly affected. Moreover, across Mull, significant effects are accepted on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is consistently assessed as having High sensitivity at distances between approximately 21 and 33 kilometres, yet the applicant attributes only a Medium magnitude of effect. This suggests a dissonance between the recognised sensitivity of these landscapes and the extent of the acknowledged impact.

A critical example of the applicant's reliance on distance-based reasoning is evident in the treatment of the Wilderness and Gribun Rocks coastal area. Here, the assessment concludes that, given the viewing distance of over 30 kilometres, the scale of change is small. This approach fails to consider the intrinsic qualities of the seascape and its integral role in supporting Mull's west-facing tourism economy, including wildlife boat operations and the accommodation provision within its western townships. The development's industrialising effect on the Atlantic seascape threatens these economic and community assets, yet none of these communities have been afforded a detailed, place-based assessment. This omission undermines the adequacy of the applicant's evaluation and overlooks the interconnected visual, economic, and social impacts that arise from the proposed development, particularly in areas so reliant on their natural and cultural landscapes for tourism and community identity.

The applicant's assessment fails to account adequately for the practical consequences of the proposed development on vulnerable island communities and wider designated landscapes. For example, Ulva, situated within the Loch na Keal National Scenic Area, is a community-owned island embarking on regeneration. Its recovery is inherently dependent on the unspoilt seascape and setting that the development threatens, yet no specific assessment of effects on Ulva has been

undertaken. This omission overlooks the critical link between the community's viability and the preservation of the natural qualities that define its environment.

Similarly, the assessment underestimates impacts on renowned designated landscapes such as Staffa, the Jura, and the Scarba, Lunga and Garvellachs National Scenic Areas. Staffa lies approximately 35 kilometres from the development site, beyond the 30-kilometre range NatureScot advised for assessing effects on National Scenic Area qualities. Despite recognising the island's panoramic maritime qualities, the applicant concludes that changes there would be small and not significant. The Jura National Scenic Area, assessed at 28 to 32 kilometres distance, is rated as having high sensitivity but attributed only medium to low magnitude effects, justified by distance and retained landforms, though its designation explicitly depends on the wild, undeveloped Atlantic outlook. The Scarba, Lunga and Garvellachs National Scenic Area, 35 to 40 kilometres away, is treated similarly. These conclusions appear to underplay the significance of the development's effects on landscapes whose designations rest on precisely the qualities at risk.

The applicant's assessment assigns the South Tiree coastal area a High sensitivity rating at an approximate distance of 35 kilometres while attributing a Low magnitude of change. This evaluation significantly understates the true extent of impact on Tiree's distinctive landscape character. Tiree is an exceptionally low-lying island, with its entire landscape defined by the dominance of sea and sky. Its highest point, Ben Hynish, reaches only 141 metres, and the island's character relies heavily on an open oceanic horizon. Introducing turbines up to 335 metres in height would present vertical structures unprecedented in the seascape. Given this exposure and sensitivity, the conclusion of a Low magnitude of change fails to capture the substantial visual and character effects, leading to an unreliable overall assessment of impact on this receptor.

The applicant's assessment has not adequately addressed the significant effects of the proposed development on mainland and island communities with direct visual and economic connections to the seascape. For example, Gigha—a community-owned island celebrated as a national emblem of island regeneration—faces the development waters from the east. The potential impacts on its carefully balanced community and economy remain unexamined, representing a notable omission in the applicant's evaluation. Similarly, Ardnamurchan Point, the westernmost point of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the types of receptors for which the applicant's distance-based moderation approach is applied, raising concerns about the adequacy of the assessment in capturing their significance.

Further, the west coast of Kintyre comprises a series of communities whose identity, character, and visitor economy are intrinsically linked to the open Atlantic seaboard views towards Islay, Jura, and adjacent waters. The Treshnish Isles and other small islands, alongside mainland coasts with views of the development area, share this position of reliance on the seascape. Despite this, the applicant's assessment appears to have overlooked these receptors, undermining the comprehensiveness of the environmental and socio-economic evaluation. Such gaps in the analysis risk

compromising the robustness of the decision-making process and warrant thorough reconsideration to ensure that all affected communities are properly accounted for.

The practical consequence of the applicant’s distance-based approach to environmental impact assessment is a systematic underestimation and discounting of significant effects on sensitive receptors located beyond approximately 20 kilometres. This methodology results in a moderated magnitude of change assigned to these receptors, despite their acknowledged sensitivity. Critically, the communities residing in these areas have not been afforded any place-specific assessment of the impacts they are likely to experience. Taken together, these factors demonstrate a consistent pattern within the applicant’s assessment whereby effects on distant yet highly sensitive receptors are diminished in importance solely due to their distance from the site. Such an approach undermines the integrity and comprehensiveness of the environmental impact assessment by failing to fully recognise and evaluate the true extent of potential effects on these communities. Consequently, the assessment does not provide a robust or reliable basis for decision-making regarding the wider environmental and social consequences of the proposed development.

1.1.904 Further Comments

I lived on Iona in my 20s. It's one of the most special places I've ever been in so many ways. The possibility of this wind farm is devastating news on so many levels. Please don't let this happen. It's happened to us in the United States and has had a negative impact on island communities like Nantucket and others.

1.1.905 Summary

The proposal for the MachairWind Offshore Wind Farm has not been demonstrated by the applicant to conform with the relevant statutory and policy frameworks governing its determination. The applicant’s own assessments acknowledge significant impacts on nationally designated landscapes as well as on the heritage and communities along this coastline. Published analyses of the applicant’s documentation reveal that the extent of these impacts has been understated, with a critical heritage assessment notably absent. Furthermore, while the proposal identifies effects on the island communities involved, no evaluation of these impacts has been conducted. The ecological requirements associated with the development have also not been shown to be achievable. It is important to note that only a portion of the project is currently submitted for consideration by the Scottish Ministers.

In light of these deficiencies, it is respectfully submitted that the Scottish Ministers should refuse consent for the MachairWind Offshore Wind Farm and decline the related marine licence application.

Should the Ministers decide against refusal, it is requested that they require the submission of additional environmental information and enhanced visual representations. Moreover, it is urged that the applications be determined only subsequent to a public inquiry, thereby allowing a comprehensive examination of the issues raised by this objection. Regardless of the decision reached, it is also sought that the Ministers explicitly address and record their conclusions on the impacts upon

cultural heritage and the affected island communities within their reasons for determination.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 595
Dear Sir/Madam,

I hereby lodge a formal objection to the MachairWind Offshore Wind Farm proposals, submitted under application numbers 00012385 for consent pursuant to section 36 of the Electricity Act 1989, and 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. These applications have been made by MachairWind Limited, a subsidiary of ScottishPower Renewables. I request that this correspondence be recorded as an official objection, that I be registered accordingly, and that I receive notification of the final determination on these applications.

The proposal concerns the installation of an offshore wind farm with an anticipated capacity of approximately 2 gigawatts. The development envisages between 91 and 144 turbines, each with a maximum blade tip height of up to 335 metres. The site lies within a defined Windfarm Development Area encompassing around 448 square kilometres of maritime space, situated north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona. This location is in close proximity to the islands and coastal communities of the southern Hebrides.

The following sections articulate the grounds for objection, grounded firmly within the relevant statutory and policy frameworks governing this planning and marine consent process. It is important to emphasise that the onus lies with the applicant to provide adequate and robust evidence demonstrating that all applicable planning and environmental tests have been satisfied. Objectors are not obliged to disprove the application. In this instance, the evidence presented by the applicant is insufficient to meet the required standards. Consequently, the applications should be refused consent.

1.1.906 Legislative and Policy Framework

The application before the Scottish Ministers fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989. As established in the applicant’s own evidence (S01), Schedule 9 mandates that the applicant must have regard to the desirability of preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant is required to take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The Scottish Ministers, in determining the application, are similarly bound to have regard to these statutory duties.

The application documentation does not adequately address these requirements. There is a clear absence of evidence demonstrating that the applicant has sufficiently considered the preservation of natural beauty or the conservation of flora, fauna, and geological or physiographical features of special interest. Likewise, there is no substantive assessment or mitigation strategy presented for the protection of sites, buildings, or objects of architectural, historic, or archaeological interest that may be affected by the proposal. This omission constitutes a failure to meet the statutory obligations imposed by Schedule 9.

Given that the applicant has not demonstrated compliance with these statutory duties, and in light of the deficiencies and omissions identified in the evidence, the application conflicts with the applicable legal and policy framework. According to the applicant's own statement (S01), such failures weigh against the granting of consent. Therefore, the application should be refused on the basis that it does not satisfy the statutory requirements under Schedule 9 of the Electricity Act 1989.

The marine licence application must be determined under Part 4 of the Marine (Scotland) Act 2010 and in accordance with Scotland's National Marine Plan, as set out in the applicant's evidence. The relevant General Policies include GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts). Compliance with these policies is a statutory requirement in the assessment of the application.

However, the application fails to demonstrate compliance with these statutory policies. The evidence identifies deficiencies and omissions in addressing the historic environment, landscape and national scenic areas, natural heritage, and cumulative impacts. Furthermore, the application does not provide sound evidence as required by GEN 19, nor does it adequately demonstrate effective engagement as required by GEN 18. These shortcomings constitute conflicts with the applicable legal and policy framework.

Given these unresolved deficiencies and the failure to meet the statutory requirements of the Marine (Scotland) Act 2010 and the National Marine Plan policies, the application does not satisfy the necessary conditions for granting consent. Accordingly, these matters weigh decisively against the approval of the marine licence.

The applicant's submission acknowledges that National Planning Framework 4 (NPF4) is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. The proposal engages several key policies within NPF4, specifically Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy). These policies set out clear expectations for the protection and enhancement of biodiversity, the safeguarding of natural places, the conservation of historic assets, and the responsible use of energy resources. However, the evidence provided by the applicant fails to demonstrate compliance with these policies. There are notable deficiencies and omissions in the supporting documentation that prevent a clear assessment of how the proposal meets the requirements of these policies. The absence of robust evidence addressing these critical areas undermines the proposal's conformity with the statutory and policy framework established by NPF4.

Furthermore, where compliance with NPF4 policies has not been demonstrated, or where the evidence identifies conflicts with the applicable legal and policy framework, these matters must weigh against the granting of consent. The applicant's failure to provide sufficient evidence to confirm adherence to Policy 3, Policy 4, Policy 7, and Policy 11 results in unresolved uncertainties and procedural shortcomings. This lack of demonstrated compliance constitutes a material planning

objection. Given the statutory status of NPF4 and its associated policies, the proposal's inability to satisfy these requirements is a fundamental flaw that cannot be overlooked. Consequently, the proposal is contrary to the provisions of NPF4, and this conflict should lead to the refusal of planning permission.

The application fails to provide the requisite Environmental Impact Assessment (EIA) and Habitats Regulations Assessment (HRA) as mandated by law, thereby precluding any lawful determination in its favour. Under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations, it is a statutory requirement that the likely significant environmental effects of the proposal be fully identified, assessed, and reported prior to any decision-making. This fundamental procedural obligation has not been met.

Furthermore, the Habitats Regulations impose a clear duty to assess the effects of the proposal on European protected sites in strict accordance with the applicable statutory tests. The submitted documentation fails to demonstrate compliance with these tests, leaving critical uncertainties regarding potential adverse impacts on protected habitats. The absence of a comprehensive and compliant HRA undermines the statutory protection afforded to these sites.

Where compliance with these legal requirements has not been demonstrated, or where the evidence reveals deficiencies, omissions, or conflicts with the relevant legal and policy framework, such failures must weigh decisively against the granting of consent. In this case, the application's failure to provide an adequate EIA and HRA constitutes a fundamental legal and procedural defect that cannot be remedied post hoc. Consequently, the proposal is contrary to the statutory requirements and must be refused.

The applicant's submission fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be considered and given due weight during the decision-making process. The evidence confirms that this statutory obligation is not merely procedural but substantive, requiring clear and demonstrable consideration within the planning assessment. The absence of such evidence in the application materials indicates a fundamental deficiency in addressing the statutory framework governing island communities.

Furthermore, where compliance with the Islands (Scotland) Act 2018 has not been demonstrated, or where the evidence identifies deficiencies, omissions, or conflicts with the applicable legal and policy framework, these matters must weigh against the granting of consent. In this case, the failure to properly consider and weigh the interests of island communities constitutes a significant procedural and substantive omission. Consequently, the proposal is in conflict with the statutory requirements and should be refused on this basis.

The applicant has failed to provide robust, objective, and proportionate evidence to demonstrate compliance with every relevant statutory duty, planning policy, and environmental assessment requirement. This failure represents a fundamental shortcoming in the application, as the evidential burden rests squarely on the

applicant to prove that all legal and policy frameworks have been satisfied. Without such demonstration, the application remains incomplete and cannot be properly assessed against the statutory and policy tests that govern planning decisions.

Moreover, the evidence submitted reveals clear deficiencies and omissions that directly conflict with the applicable legal and policy framework. These unresolved issues are not minor or technical but go to the heart of the statutory and policy compliance required for lawful consent. The absence of conclusive evidence to address these matters means that the application does not meet the necessary standards set out in planning law and policy, thereby undermining the legitimacy of any grant of consent.

In light of these significant evidential shortcomings and the applicant's failure to discharge the burden of proof, the application should be refused. The legal and policy framework is explicit that where compliance is not demonstrated, or where conflicts and omissions persist, these factors must weigh decisively against the granting of consent. Accordingly, the determining authority must reject the proposal on the basis that the applicant has not fulfilled its fundamental responsibility to prove compliance with all relevant legal and policy requirements.

1.1.907 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to comply with the impact criteria established in NPF4 Policy 11, thereby undermining the policy's conditional support for renewable energy development. Although Policy 11 endorses renewable energy initiatives, this support is explicitly contingent upon adherence to impact criteria, including those concerning effects on communities (Policy 11(c)) and on landscape, seascape, and other receptors (Policies 11(d) and 11(e)). The evidence clearly demonstrates that the proposal conflicts with these criteria, resulting in significant adverse effects that cannot be reconciled within the policy framework.

Specifically, the proposal would cause considerable harm to nationally designated landscapes and seascapes, while failing to prove that the cultural significance of scheduled monuments and their settings would be preserved. Furthermore, it does not satisfactorily demonstrate how island communities would be protected or how the ecological requirements set out by the policy would be met. These shortcomings confirm that the proposal is not aligned with the essential safeguards embedded in NPF4 Policy 11 and, as such, should not be supported.

When considering mitigation measures, it is essential to compare the proposal's approach with the requirements set out in relevant policies of the National Planning Framework 4 (NPF4). Policy 11 must be read alongside Policies 4(c) and 4(d), which specifically protect National Scenic Areas and nationally important landscapes from significant adverse effects on the qualities for which they were designated. Additionally, Policy 7—including Policy 7(h) concerning scheduled monuments and Policies 7(c) and 7(d) relating to the setting of historic assets—provides a framework to safeguard cultural heritage. Policy 3 further establishes rigorous biodiversity protections. In this context, the proposal falls short. It would result in significant adverse effects on nationally designated landscapes and seascapes, with no demonstrated mitigation adequate to protect these qualities. Similarly, the cultural

significance of scheduled monuments and their settings has not been shown to be preserved. The proposal also fails to provide evidence that island communities would be safeguarded, nor that the ecological tests under Policy 3 can be satisfactorily met based on the submitted evidence. Accordingly, the proposal conflicts with these interrelated NPF4 policies designed to protect nationally important landscapes, heritage assets, and biodiversity.

The proposal would result in significant adverse impacts on the landscape, heritage, and community interests safeguarded by the Argyll and Bute Local Development Plan 2. These detrimental effects undermine the purpose of the policies designed to protect the terrestrial environment and local character of the area. Consequently, the proposal fails to align with the objectives set out in the development plan framework relevant to land-based considerations.

This inconsistency extends beyond the local plan to the National Planning Framework 4 when considered in its entirety. The applicant has not provided sufficient evidence to demonstrate that the proposal complies with or justifies departure from these strategic planning policies. As a result, the proposal stands in clear conflict with the established planning policy framework at both local and national levels.

In light of these points, the proposal cannot be supported as it contradicts essential policy protections for the land-based environment within Argyll and Bute. The adverse effects identified and the lack of demonstrable compliance with the development plan justify refusal in accordance with established planning principles.

1.1.908 Seascape, Landscape and Visual Effects

The applicant’s assessment methodology, as set out in Appendix 16.1, fails to specify any distance threshold beyond which major effects would cease. Despite this omission, a published Evidence Note analysing the applicant’s Chapter 16 and its appendices reveals a clear pattern: no highly sensitive receptor located beyond approximately 20 kilometres from the development is assigned the highest magnitude of change, regardless of receptor sensitivity or visibility extent. This indicates an implicit distance-based limitation on the assessment of impact severity. The applicant’s own documents further demonstrate the influence of distance, noting for example that a coastal area over 30 kilometres away is judged to experience only a small scale of change due to viewing distance. Additionally, the Landscape Character synthesis classifies magnitude as High within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. This systematic moderation of magnitude at distances coinciding with the locations of the most sensitive designated landscapes results in protective tests being applied to understated inputs. Consequently, the conclusions drawn do not provide a reliable description of the effects for which Scottish Ministers are being asked to grant consent.

In considering the visual impact of the proposed development, it is important to acknowledge the limitations of the mitigation measures as they are represented through the submitted visualisation materials. While the applicant has adhered to NatureScot’s visualisation guidance, which is a recognised standard, these materials

inherently lack the capacity to fully convey the true scale and effect of the development as experienced in situ. This shortcoming is significant when assessing the effectiveness of any proposed mitigation designed to lessen visual intrusion.

NatureScot's guidance explicitly notes that printed visualisations are unable to replicate the scale a viewer perceives in the field. This limitation extends to wireline drawings, which are included within the same panoramic projections and are intended to supplement the photographic images. However, these wireline drawings are themselves technical renderings embedded within the visualisation framework and do not serve as an independent means to correct or enhance the viewer's understanding beyond the constraints of the accompanying photographs. Therefore, reliance on these materials may understate the actual visual impact and the degree to which mitigation measures can be expected to succeed.

Given these inherent constraints, it is prudent to approach the visual assessment with caution and to consider the possibility that the visual effects might be more pronounced than the submitted materials suggest. This underscores the necessity for comprehensive on-site evaluations and a robust consideration of alternative or additional mitigation strategies to address any residual visual effects that may not be fully captured in the visualisation evidence.

The applicant's evidence acknowledges that the proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration to the character of the night-time seascape over the intended 35-year operational lifespan. This change is significant as it transforms an existing natural and unlit maritime environment into one marked by artificial lighting, with clear implications for the visual qualities and experiential value of the seascape after dark. Furthermore, the applicant's assessment rightly notes that the 35-year operational period does not diminish the policy significance of this harm. Granting consent for the development effectively signals that this particular seascape is considered appropriate for wind farm use despite the adverse impact on its night-time character. This carries considerable weight in planning terms, as it establishes a precedent regarding the acceptability of lighting effects on seascape character within the policy framework. Consequently, the introduction of permanent aviation and navigation lighting must be carefully weighed against policy objectives aimed at conserving the natural qualities of the seascape, recognising that harm arising from such lighting is enduring and materially alters the night-time environment.

The proposed development's assessment of landscape and seascape effects fails to adequately demonstrate compliance with the relevant planning policies designed to safeguard these nationally important environments. While some mitigation measures have been proposed, the applicant's conclusions regarding the scale of the identified effects lack consistency when measured against its own established methodology. This discrepancy undermines confidence in the effectiveness of the proposed mitigation and calls into question whether the residual impacts have been properly accounted for in line with policy expectations.

Furthermore, the proposal does not satisfy the requirements set out in NPF4, specifically Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively emphasize

the need to protect significant landscape and seascape assets from adverse effects. The applicant has not provided sufficient evidence to demonstrate that its scheme respects these protections or that any unavoidable effects have been minimised to an acceptable degree. As such, the proposal does not meet the necessary policy tests for development in sensitive landscape and seascape settings.

1.1.909 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment employs the methodology recognised by Historic Environment Scotland for evaluating effects on the setting of historic assets. This methodology, developed and refined through consultation with Historic Environment Scotland, mandates an evaluation not only of visual change but specifically whether such changes affect the contribution that setting makes to the cultural significance of the heritage asset, as well as whether the integrity of the setting is adequately retained. Importantly, the methodology explicitly states that visual change should not be equated directly with adverse impact, requiring a nuanced and comprehensive assessment beyond mere visibility or proximity considerations.

However, a Methodological Audit prepared in support of community objections, drawing solely on the applicant's Appendix 14.3, identifies a critical deficiency in the applicant's operational assessment. While the assessment acknowledges relevant heritage attributes such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it fails to demonstrate how the integrity of the setting has been evaluated in accordance with the applicant's own accepted methodology. The assessment effectively describes visual changes but omits the essential evaluative step required by the methodology—namely, a clear analysis of how those visual changes translate into effects on cultural significance and setting integrity. This omission undermines the reliability of the applicant's conclusions that the integrity of the setting is adequately retained, thereby calling into question the overall robustness of the heritage impact assessment.

The applicant's baseline assessment recognises that the cultural significance of the heritage assets in question arises from a range of interrelated qualities. These include elements such as pilgrimage, arrival by sea, and movement through a living cultural landscape. Furthermore, the significance is closely tied to the relationships between monuments, spirituality, and the surrounding landscape and seascape, which are primarily experienced dynamically through movement rather than from fixed viewpoints.

Notwithstanding this acknowledgement, Historic Environment Scotland's consultation responses, as recorded within the application documentation, have emphasised the need for additional viewpoints to be incorporated. This request reflects a concern that the current assessment may not fully capture the broader experiential and cultural landscape qualities that contribute to the significance of the heritage assets. Without such additional viewpoints, the assessment risks presenting an incomplete understanding of how these assets are perceived and valued within their wider context.

Given the importance of these broader cultural and experiential factors, it is essential that the assessment fully represents the dynamic nature of the heritage setting.

Addressing Historic Environment Scotland's concerns by incorporating further viewpoints would ensure a more robust and comprehensive understanding of the heritage impacts, thereby supporting a more informed decision-making process.

The practical consequence of the shortcomings identified in the landscape assessment is that the subsequent heritage impact conclusions cannot be regarded as fully reliable. Since the heritage conclusions are directly dependent on the landscape assessment, any understatement of landscape effects inevitably results in a corresponding understatement within the heritage evaluation. This dependency means that the heritage impact findings are compromised to the extent that the landscape assessment fails to accurately capture the true magnitude of effects.

In this context, the evidence clearly indicates that where landscape effects have been understated as previously outlined, the heritage conclusions built upon these findings inherit the same deficiency. This linkage undermines the credibility of the heritage impact assessment and suggests that a more robust and comprehensive landscape analysis is essential to support sound heritage conclusions. Without addressing these deficiencies, the planning authority risks making decisions based on incomplete or misleading information regarding the potential heritage impacts.

The application fails to comply with essential policy requirements designed to safeguard heritage assets, thereby undermining its overall acceptability. In particular, it does not demonstrate that the cultural significance of internationally and nationally important heritage assets and their settings will be adequately protected. Without this assurance, the potential for irreversible harm to these irreplaceable resources remains unmitigated.

This shortfall directly engages several key policies, notably NPF4 Policy 7(h) concerning scheduled monuments, along with Policies 7(c) and 7(d) relating to their setting. It also involves GEN 6 and the specific guidance found in paragraphs 4.22 to 4.23 of the National Marine Plan. Together, these provisions establish a clear framework for heritage protection, which the application must meet to be considered acceptable.

Furthermore, the Scottish Ministers currently lack the necessary assessment to conclude that the proposal would protect these heritage assets effectively. Without such a comprehensive evaluation, it is not possible to confirm compliance with statutory heritage protection obligations. For these reasons, the application should be refused until it can properly demonstrate alignment with the relevant heritage policies.

1.1.910 Effects on Island Communities, Tourism and the Local Economy

The proposed development's potential impacts cannot be adequately mitigated without fundamentally altering the qualities that attract visitors to the island communities in question. While mitigation measures might address isolated effects, they fail to preserve the intrinsic landscape, seascape, cultural heritage, tranquillity, and remoteness that underpin the visitor appeal. The applicant's own baseline assessments confirm these attributes as critical to the islands' character and visitor

experience, thereby limiting the effectiveness of any partial or compensatory mitigation.

These qualities form the foundation of the island communities' economic and social sustainability. The exceptional dependence on visitors means that any change to these attributes directly undermines the local economy, which supports essential services, population retention, and long-term community viability. Consequently, the proposal represents a fundamental threat to the islands' continued existence as vibrant, sustainable communities rather than an impact that mitigation can suitably address.

The failure to assess the habitability of the affected island communities has practical consequences for understanding the proposal's full socio-economic impact. Although the applicant's consultants acknowledged habitability as a potentially significant pathway for effects on island communities, no specific place-based assessment was undertaken. Instead, the socio-economic evaluation in Chapter 18 focuses on regional-level analysis, emphasizing port communities while neglecting equivalent scrutiny of the islands directly facing the development. Despite this omission, the assessment concludes that these island communities have low sensitivity to tourism effects, a finding that lacks evidential support. Small island economies differ markedly from regional averages, as they are heavily reliant on sectors most vulnerable to changes in the qualities attracting visitors. This reliance does not lessen their sensitivity but rather increases their dependence on those at-risk attributes. Therefore, the conclusion of low sensitivity, reached without detailed, place-specific analysis, amounts to an assumption rather than a demonstrated fact. Such an approach undermines confidence in the adequacy of the socio-economic assessment to identify or mitigate potential adverse impacts on island communities.

In comparison to the rigorous mitigation requirements set out for environmental and socio-economic impacts elsewhere in the proposal, the assessment of effects on island communities is notably deficient. The proposal fails to meet the statutory and policy obligations established to protect these communities. Specifically, the National Marine Plan's GEN 19 and paragraph 4.81 mandate that decisions affecting marine environments must be founded on robust socio-economic evidence and adopt a precautionary approach where data is insufficient. Moreover, NPF4 Policy 11(c) alongside the Islands (Scotland) Act 2018 explicitly require that the interests of island communities be thoroughly assessed and afforded due weight through meaningful engagement from the earliest stages through to the conclusion of the decision-making process.

Despite recognising the particular scrutiny island communities require, the applicant did not undertake the necessary assessment to understand how the proposal would affect them. No evidence has been provided to demonstrate compatibility with the principles of sustainable island communities, nor that the statutory duties owed to these populations have been fulfilled. As such, the proposal falls short of the established planning and statutory standards, undermining the protection and consideration that island communities are entitled to under current policy and legislation.

1.1.911 Ecology, Biodiversity and Habitats Regulations

The development area is of considerable ecological significance, encompassing Priority Marine Features and Annex I habitats within its boundaries. Furthermore, the adjacent waters provide habitat for a range of protected species, including seabirds, marine mammals, and basking sharks. This concentration of sensitive marine biodiversity underlines the environmental importance of the site and its surroundings.

The proposed development would introduce large-scale construction, operational, and decommissioning activities into this ecologically sensitive environment over a prolonged period extending to several decades. Such extensive and sustained disturbance carries the potential for significant adverse environmental effects, raising concerns about the long-term impacts on the Priority Marine Features and the protected species dependent on these habitats. Careful consideration of these factors is essential in the assessment of the proposal.

The applicant's submission of both a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan indicates an acknowledgment of potential adverse impacts on the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are conventionally prepared in situations where an adverse effect on the integrity of a protected site cannot be definitively ruled out. This approach implicitly recognises that existing mitigation measures may be insufficient to prevent harm to the designated site and its qualifying features.

Importantly, the submission of these derogation and compensation documents is a notable element of the application, as it reflects the applicant's understanding that the Scottish Ministers might reach a different conclusion regarding the likelihood of adverse effect. This procedural step underscores the uncertainty around the impacts and the necessity for compensatory measures should derogation be granted. Consequently, the reliance on these Without Prejudice documents calls for careful scrutiny to ensure that any potential harm is appropriately addressed and that the integrity of the protected site is preserved in accordance with relevant conservation obligations.

The applicant acknowledges that under the Habitats Regulations, consent for developments affecting protected sites may only be granted where the competent authority has ascertained that the proposal will not adversely affect the integrity of the site, unless the stringent derogation tests are satisfied. It is emphasised that consent can lawfully be granted only where no reasonable scientific doubt remains regarding potential impacts. The burden of proof lies with the applicant to demonstrate this high evidential standard.

Furthermore, the applicant recognises that mitigation, compensation proposals, and future monitoring, while important, do not by themselves satisfy the statutory tests required under the Habitats Regulations. This rigorous approach ensures that all potential effects on protected habitats and species are thoroughly assessed before any consent is granted, reflecting the precautionary principle embedded within the legislation.

This legal framework is supported and reinforced by relevant policy provisions, including GEN 9 and GEN 13 of the National Marine Plan and Policies 3, 4(b), 4(e),

and 4(f) of the National Planning Framework 4. Together, these policies establish a comprehensive and robust framework to safeguard protected sites, ensuring that decisions on consent are made with the utmost regard to environmental protection and legal compliance.

The assessment of the submitted evidence, notably the applicant's own derogation documents, clearly indicates a failure to satisfy the statutory tests designed to protect internationally important habitats and species. The information provided does not demonstrate the requisite degree of certainty that these legal requirements can be met. Consequently, this shortfall fundamentally undermines the justification for granting consent in this instance.

1.1.912 Cumulative and In-Combination Effects

The current proposal before the Scottish Ministers comprises only a portion of the overall project, notably excluding the export cable corridor and the onshore transmission works, both essential for the wind farm's operation. By deferring these critical components to subsequent applications, the cumulative effects of the entire development are never assessed together. This fragmentation leads to an incomplete evaluation of the project's full environmental and operational impacts at the principal decision-making stage.

Such an approach conflicts with established legal principles, as reinforced by the courts in Raeshaw Farms, which mandate that a project must be considered in its entirety rather than being artificially divided into smaller segments whose individual impacts appear diminished. Assessing only parts of the project undermines the integrity of the planning process and risks overlooking significant cumulative effects, thereby rendering the current assessment legally and procedurally flawed.

The cumulative impact assessment relies fundamentally on the findings established in the broader Environmental Impact Assessment, as detailed in the applicant's evidence. This means that the baseline conditions for landscape, heritage, and socio-economic factors form the foundation upon which cumulative effects are evaluated. However, if these initial assessments understate the true extent of impacts, the cumulative assessment inherently inherits this deficiency.

Because the baseline is reduced, the assessment of combined effects from the proposed development alongside other existing, consented, and foreseeable projects is consequently understated. This approach risks overlooking the full magnitude of the cumulative impacts that may arise, thereby compromising the reliability of the overall environmental appraisal. It is essential that the baseline accurately reflects current conditions to ensure that the cumulative effects are neither underestimated nor misrepresented.

In light of this, the cumulative impact assessment as presented cannot be regarded as a fully robust or dependable evaluation of the combined effects. Without addressing the foundational understatements in the baseline assessments, there remains significant uncertainty regarding the true scale of cumulative impacts, which warrants further scrutiny before the proposal can be confidently supported.

The applicant has failed to demonstrate that the cumulative and in-combination effects of the proposal, including deferred works, have been reliably identified and assessed as required by policy and regulation. This omission is in direct conflict with the provisions set out in GEN 21 and paragraph 4.85 of the National Marine Plan, as well as NPF4 Policy 11(e), which collectively mandate comprehensive consideration of all project components to prevent project splitting. The Environmental Impact Assessment Regulations further reinforce this requirement, underscoring the necessity of a holistic appraisal of the project's environmental implications.

The absence of explicit treatment of the deferred works within the application undermines the integrity of the assessment process and risks overlooking significant environmental impacts that may arise cumulatively or in combination with other activities. Such an approach is inconsistent with established planning policy and statutory obligations designed to ensure that decision-making is informed by a complete and accurate understanding of all relevant effects. Without addressing this gap, the assessment remains incomplete and cannot be considered compliant with the requisite standards.

Accordingly, it is essential that the decision-making process expressly incorporates an evaluation of the deferred works and their potential cumulative effects. Only then can the application be properly assessed in line with GEN 21, the National Marine Plan, NPF4 Policy 11(e), and the EIA Regulations. In the absence of such consideration, the proposal does not meet fundamental policy and regulatory requirements, and consent should not be granted.

1.1.913 Public Engagement, Site Selection and Environmental Information

The consultation process for this application has been fundamentally undermined by significant deficiencies in public participation, which directly affect the legitimacy of the site-selection process. The applicant requests that Scottish Ministers place considerable weight on the site-selection process; however, the quality of public involvement at both the plan and site-selection stages has been inadequate and has persisted into the application stage. The application consists of many thousands of pages of technical documentation, yet the consultation period was scheduled during the busiest months for island communities—when residents are engaged continuously throughout the visitor season and specialist advice is least accessible. Meanwhile, the applicant has had several years and substantial professional and financial resources to prepare its case, creating an imbalance that severely limits effective public engagement.

In accordance with GEN 18 of the National Marine Plan and the principles of effective public participation enshrined in the Aarhus Convention, those affected must be afforded a realistic opportunity to participate in decisions of this magnitude. The conditions imposed on the affected communities, however, have fallen short of this standard. This shortfall must be firmly borne in mind by the Ministers when considering the representations made, as it calls into question whether the consultation has genuinely fulfilled its intended role in the decision-making process.

In comparing the proposed mitigation measures with the environmental information provided, it is evident that the Environmental Impact Assessment (EIA) falls short of

sufficiency required for a robust determination. While the application includes various assessments, these rely on methodologies that do not substantiate their conclusions adequately. For instance, the landscape assessment applies outcomes based on a distance pattern not supported by its own stated methodology. Similarly, the heritage assessment fails to demonstrate adherence to its prescribed integrity test, and the socio-economic assessment lacks a place-based analysis pertinent to the affected islands. Moreover, the application anticipates the resolution of certain significant effects through future assessments, post-consent plans, monitoring, and additional approvals, which do not fulfil the EIA Regulations' requirement that likely significant effects must be comprehensively understood prior to determination.

Consequently, the Scottish Ministers are compelled to base their decision solely on the evidence presented at the time of determination, without reliance on assumptions that outstanding matters will be satisfactorily addressed later. The applicant has not demonstrated that the environmental information submitted meets the adequacy standard necessary for informed decision-making. This insufficiency undermines the integrity of the assessment and precludes the Ministers from confidently concluding that the environmental implications of the proposal have been properly identified and addressed.

1.1.914 Effects on Local Area

The practical consequence of the applicant's underassessment is that the direct and significant effects on the communities of Islay, Colonsay, and Oronsay have not been properly recognised or addressed. Despite Islay and Colonsay being the closest inhabited islands to the development area, which lies immediately north-west of Islay and west of Colonsay, the application evaluates Islay primarily as a potential project site rather than as a community affected by proximity. This omission fails to consider the Atlantic-facing communities on Islay whose daily environment and economy are intimately connected to the nearby 448 square kilometre development area, leaving a critical gap in understanding the local impacts on their setting, economy, and social fabric.

For Colonsay and Oronsay, the situation is equally concerning. Their seaward outlook, which fundamentally shapes everyday life, directly faces the proposed development. The North Colonsay and Western Cliffs Special Protection Area, located on Colonsay's coastline, is central to the applicant's derogation case and compensation plan. This area represents the clearest recognition within the application that harm to the internationally protected seabird populations of these cliffs cannot be ruled out, yet the assessment does not adequately address the wider implications for the community and environment dependent on this designated site.

Further compounding the deficiencies in the heritage assessment is the presence of Oronsay Priory, a scheduled monument of national importance within this community's area. The assessment's identified gaps, particularly in relation to the treatment of the monument's open maritime setting, apply fully here and undermine confidence in the evaluation's reliability. Taken together, these shortcomings demonstrate a failure to comprehensively assess the environmental and heritage impacts on Islay, Colonsay, and Oronsay, thereby weakening the overall credibility of the application's impact evaluation.

The applicant's assessment significantly underestimates the scale and importance of visual, community, and heritage impacts on Iona, resulting in an incomplete evaluation of environmental and social effects. The Coastal Character assessment identifies the Sound of Iona as having high sensitivity, with direct orientation towards the development area and extensive visibility. The geographical extent of change is large, with turbines visible across approximately 39 degrees of the horizon from a distance of about 21 kilometres, producing a moderate and significant overall effect. Similarly, the highly sensitive west coast of Iona experiences widespread visibility of the proposals, and the applicant acknowledges significant effects on residents and visitors throughout much of the island, including at Dùn Ì, the island's highest point.

Iona's internationally important monastic landscape, comprising the Abbey, the Nunnery, and high crosses, derives its significance from pilgrimage, arrival by sea, and movement through the landscape, as noted in the applicant's baseline. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet no visualisation has been provided from key vantage points such as the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn. This omission undermines the thoroughness of the heritage impact assessment.

Community concerns are also insufficiently addressed. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal. Despite the applicant's consultants identifying habitability as a potential pathway of effect on the community, no assessment of this has been undertaken. The perceived scale of the turbines further illustrates the magnitude of visual impact; for example, Ben Hynish on Tiree, a familiar landmark standing 141 metres tall and visible from Iona at approximately 33 kilometres, would be overtopped by the largest turbines by around 194 metres at a closer distance of roughly two-thirds that span.

Taken together, these factors demonstrate that the applicant's assessment does not fully capture the significant and wide-ranging effects on Iona's landscape, heritage, and community, calling into question the accuracy and completeness of the environmental and social impact evaluation.

While the applicant acknowledges significant visual effects at key locations such as Erraid, the Core Paths of the Ross of Mull, and Fionnphort—the gateway to Iona and crucial to the visitor experience—their assessment attributes only medium magnitude effects despite recognising high sensitivity in these areas. This approach suggests a mitigation comparison that underestimates the true scale of impact on communities most directly tied to visitor flows. The acceptance of significant effects here contrasts with a seemingly inconsistent application of significance across other sensitive areas.

Further scrutiny reveals that although the applicant concedes significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Areas, as well as the Loch na Keal National Scenic Area—an area of high sensitivity spanning approximately 21 to 33 kilometres—the effects are again limited to medium magnitude. This assessment appears to rely heavily on distance as a mitigating factor rather than fully accounting for the intrinsic value and interrelated character of these designated landscapes. For example, the treatment of the Wilderness and Gribun Rocks coastal area, where changes at distances exceeding 30 kilometres are

deemed small, exemplifies this distance-based reasoning that may downplay the project's visual and experiential consequences.

Moreover, the applicant’s assessment does not adequately address the broader economic and community impacts on Mull’s western coastal townships, whose tourism economy and wildlife boat operations are intimately connected to the Atlantic seascape that the development would industrialise. None of these communities has received a place-based assessment, leaving a significant gap in understanding how the project would affect livelihoods and landscape appreciation in areas dependent on the natural environment. In sum, the assessment underrepresents the cumulative visual, economic, and community impacts on Mull and the Ross of Mull, particularly regarding designated landscapes and tourism-reliant communities, warranting a more thorough and place-specific evaluation.

The applicant’s assessment of the impacts on wider seaboard designated landscapes and island communities appears to underestimate significant effects, particularly when compared to the mitigation standards typically applied to sensitive areas. For instance, Ulva, a community-owned island within the Loch na Keal National Scenic Area, is at the outset of its regeneration and relies heavily on the unspoilt seascape and setting, qualities that remain unassessed in the application despite being integral to the island’s recovery. Similarly, Staffa, one of Europe’s most celebrated small islands and also within the Loch na Keal National Scenic Area, lies approximately 35 kilometres from the development. This exceeds the 30 kilometre assessment boundary suggested by NatureScot, yet the applicant concludes the effects there would be small and not significant, even though their own evaluation acknowledges the panoramic maritime qualities of the location.

Further, the Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed with High sensitivity at a distance of 28 to 32 kilometres but is attributed only Medium to Low magnitude of effect, justified by distance and retained landforms. This approach is similarly applied to the Scarba, Lunga and the Garvellachs National Scenic Area, situated approximately 35 to 40 kilometres away. Such treatment fails to adequately reflect the intrinsic qualities that underpin these designations. Taken together, these assessments omit the full extent of potential impacts on the natural and cultural qualities of these designated landscapes and the vulnerable island communities that depend on them, thereby undermining their protection and the integrity of the wider seaboard environment.

When comparing the assessment of effects on Tiree with other instances where mitigation has been carefully considered, it becomes apparent that the applicant’s evaluation significantly understates the magnitude of change. The South Tiree coastal area is classified as having High sensitivity at a distance of approximately 35 kilometres, yet the assessment assigns it a Low magnitude of change. This discrepancy raises concerns about the reliability of the evaluation, given the known sensitivity of the landscape and its exposure to visual impacts.

Tiree’s landscape character is distinctive and particularly sensitive due to its exceptionally low-lying nature. The island’s defining features are the dominance of sea and sky, with the highest elevation, Ben Hynish, reaching only 141 metres. Against this backdrop, the introduction of turbines up to 335 metres tall would

represent a substantial and unprecedented vertical intrusion into the seascape. Such structures would starkly contrast with the existing open oceanic horizon, fundamentally altering the visual and experiential qualities that define Tiree's landscape character.

Given these factors, concluding a Low magnitude of change for such a sensitive receptor underrepresents the true scale of impact. The assessment's understatement risks undermining the credibility of its findings and overlooks the significant implications for Tiree's landscape character. A more accurate and rigorous evaluation is necessary to ensure that the effects are properly understood and addressed in the planning process.

The applicant's assessment fails to consider significant effects on mainland and island communities that have direct visual and economic connections to the seascape, undermining the comprehensiveness of the evaluation. For instance, Gigha, a community-owned island renowned nationally for its regeneration, faces the development waters directly from the east; yet, no examination has been made of the impacts on its delicate community balance and local economy. Similarly, Ardnamurchan Point—the westernmost tip of the British mainland—offers panoramic views along the Hebridean coast that attract visitors throughout the peninsula. These seaward panoramas, precisely the receptors affected by the distance-based mitigation measures challenged in this objection, have been overlooked. Furthermore, the west coast of Kintyre comprises a series of communities whose identity and visitor economy are shaped by the open Atlantic seaboard views towards Islay, Jura, and surrounding waters. The Treshnish Isles and other small islands with sightlines to the development area are equally disregarded. This collective omission calls into question the thoroughness of the applicant's assessment regarding the full range of receptors reliant on and influenced by this seascape.

The applicant's approach to environmental impact assessment employs a distance-based methodology that systematically moderates and discounts the significance of effects on sensitive receptors located beyond approximately 20 kilometres. This method contrasts with a more thorough, place-based assessment that would address the specific conditions and vulnerabilities of each affected community. By applying a generalized mitigation threshold at this distance, the assessment effectively diminishes the acknowledged magnitude of change experienced by receptors further afield, potentially overlooking meaningful impacts that warrant detailed consideration and tailored mitigation measures.

Taken together, the evidence demonstrates a consistent pattern whereby highly sensitive receptors beyond the 20-kilometre limit receive only a moderated evaluation of effects, while the communities living within these areas are not the subject of any focused, locality-specific assessment. This systematic discounting undermines the integrity of the environmental impact assessment by failing to account adequately for the lived experience and environmental sensitivities of these distant but nonetheless affected populations. Such an approach risks underestimating significant adverse effects and weakens the overall robustness and credibility of the applicant's environmental evaluation.

1.1.915 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy requirements governing its determination. The applicant's own evaluations acknowledge significant impacts upon nationally designated landscapes, as well as on the heritage and communities along this coastal area. Furthermore, analyses published from the applicant's documentation reveal that these impacts have been understated, with the necessary heritage assessment absent from the submission. In addition, although the effects on the island communities involved have been identified, no assessment of these impacts has been undertaken. The ecological requirements stipulated by relevant legislation have not been demonstrated as achievable. It is also pertinent to note that only a portion of the project is currently before the Scottish Ministers for consideration.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to withhold the associated marine licence. Should the Ministers incline against refusal, I request that the applicant be required to provide additional environmental information accompanied by enhanced visualisations. Moreover, the decision should be deferred until after a public inquiry, ensuring that the concerns raised within this objection receive thorough scrutiny. Regardless of the outcome, I further request that the Ministers explicitly address the impacts on cultural heritage and the affected island communities within their stated reasons for the decision.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 596
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, detailed in applications 00012385 for consent under section 36 of the Electricity Act 1989, and 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010, both filed by MachairWind Limited (ScottishPower Renewables). I request that this communication be recorded as an official objection, that my status as an objector be formally recognised, and that I receive notification of the final determination regarding these applications.

The proposals seek approval for the construction and operation of an offshore wind facility with a generating capacity of approximately 2 gigawatts. This development would comprise between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip, situated within a Windfarm Development Area spanning some 448 square kilometres. The designated site lies to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in proximity to the southern Hebrides' islands and coastal communities.

In accordance with the statutory and policy framework governing these applications, the subsequent sections outline the planning and environmental grounds on which my objection is based. It is important to emphasise that the evidential burden lies entirely with the applicant, who must substantiate that all relevant statutory tests and policy criteria are satisfied. Objectors such as myself bear no obligation to disprove the application. On the basis of the analysis presented below, it is clear that the applicant has failed to meet this burden. Consequently, I maintain that the applications should be refused.

1.1.916 Legislative and Policy Framework

The application fails to demonstrate adequate mitigation of adverse effects on natural beauty, flora, fauna, geological features, and sites of architectural, historic, or archaeological interest as required under Schedule 9 of the Electricity Act 1989. Schedule 9 explicitly mandates that the applicant must have regard to preserving these interests and take reasonable steps to mitigate any negative impacts arising from the proposal. Furthermore, the Scottish Ministers are similarly bound to consider these statutory duties when determining the application.

In this case, the applicant has not provided sufficient evidence to show compliance with these obligations. There are clear deficiencies and omissions in addressing the preservation and conservation requirements set out in Schedule 9. The absence of demonstrated mitigation measures and failure to properly consider the statutory duties constitute a conflict with the applicable legal and policy framework. As established, such shortcomings weigh decisively against the granting of consent.

The marine licence application is required to be determined under Part 4 of the Marine (Scotland) Act 2010, with authorisation decisions made in accordance with Scotland’s National Marine Plan unless relevant considerations indicate otherwise. The National Marine Plan sets out General Policies that are particularly pertinent to this proposal, including GEN 4 on Co-existence, GEN 6 and paragraphs 4.22 to 4.23

concerning the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 addressing Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 and paragraph 4.85 on Cumulative Impacts. Compliance with these policies is an integral part of the statutory assessment process for the marine licence application.

However, the application fails to demonstrate compliance with these statutory requirements and relevant National Marine Plan policies. The evidence identifies deficiencies and omissions in the submission that undermine the statutory assessment. In particular, the application does not adequately address the requirements of GEN 19 regarding the provision of sound evidence, nor does it sufficiently consider cumulative impacts as required by GEN 21. Furthermore, there is a lack of clear engagement as mandated by GEN 18, and the application does not satisfactorily account for potential effects on the historic environment, landscape, and natural heritage as set out in GEN 6, GEN 7, and GEN 9. These shortcomings represent significant conflicts with the applicable legal and policy framework.

Given these unresolved deficiencies and the failure to demonstrate compliance with the National Marine Plan policies, the application does not meet the statutory criteria for authorisation under the Marine (Scotland) Act 2010. As established by the evidence, where compliance has not been demonstrated or where conflicts with the legal and policy framework exist, these matters weigh decisively against the granting of consent. Therefore, the marine licence application should be refused on the grounds that it does not satisfy the statutory requirements or the relevant policies of the National Marine Plan.

The proposal fails to comply with key policies of National Planning Framework 4, which is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. Specifically, the application does not demonstrate compliance with Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy). This failure to meet the requirements of these policies, as well as the identification of deficiencies and omissions in the supporting evidence, constitutes a clear conflict with the applicable legal and policy framework. Consequently, these matters weigh against the granting of planning consent.

The proposal fails to comply with the statutory requirements for environmental assessment, as it does not provide an adequate Environmental Impact Assessment (EIA) in accordance with The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations. These regulations mandate that the likely significant environmental effects of the development must be identified, assessed, and reported prior to any determination. Without this essential information, the decision-making process is fundamentally compromised, preventing a lawful and informed consent.

Furthermore, the proposal does not satisfy the obligations under the Habitats Regulations, which require a thorough assessment of the effects on European protected sites in line with the applicable statutory tests. The absence of a compliant Habitats Regulations Assessment means that the potential impacts on designated

habitats and species have not been properly evaluated, undermining the protection afforded by these regulations and contravening legal requirements.

Given these failures to demonstrate compliance with both the Environmental Impact Assessment and Habitats Regulations, and the presence of deficiencies and omissions in the submitted evidence, the proposal conflicts with the relevant legal and policy framework. As established, such shortcomings must weigh decisively against the granting of consent. Therefore, the application should be refused on the grounds of inadequate environmental and habitats assessment.

The proposal fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be properly considered and given due weight in the decision-making process. This statutory obligation is not met by the application, as there is a clear absence of evidence showing that the specific needs and concerns of island communities have been adequately assessed or integrated into the planning rationale.

The Islands (Scotland) Act 2018 explicitly requires decision-makers to ensure that island communities' interests are a material consideration. However, the submitted documentation does not provide any substantive analysis or engagement outcomes that reflect these interests. This omission constitutes a significant procedural and evidential deficiency. Without such consideration, the proposal conflicts with the applicable legal and policy framework, undermining the statutory purpose of the Act.

Where compliance with the Islands (Scotland) Act 2018 has not been demonstrated, or where deficiencies and omissions are evident, these matters must weigh decisively against the granting of consent. In this case, the failure to properly consider and weigh island community interests is a fundamental flaw that renders the proposal unacceptable in planning terms. The application should therefore be refused on the basis that it does not satisfy the statutory requirements imposed by the Islands (Scotland) Act 2018.

The applicant has failed to provide robust, objective, and proportionate evidence to demonstrate compliance with every relevant statutory duty, planning policy, and environmental assessment requirement. This failure constitutes a fundamental deficiency in the application, as the evidential burden rests squarely on the applicant to prove that all legal and policy frameworks have been satisfied. The absence of such demonstration means that the application does not meet the necessary standards for lawful and policy-compliant development. Furthermore, the evidence submitted reveals omissions and conflicts with the applicable legal and policy framework, which directly weigh against the granting of consent. In light of these clear and unaddressed shortcomings, the application cannot be considered compliant or acceptable, and consent should therefore be refused.

1.1.917 Conflict with National Planning Framework 4 and the Development Plan

The practical consequence of the proposal's failure to meet the impact criteria set out in NPF4 Policy 11 is that it cannot receive the policy's intended support for renewable energy development. While Policy 11 endorses such development, this support is conditional upon compliance with specific impact tests designed to protect

communities, landscapes, seascapes, and other sensitive receptors. The proposal, however, does not satisfy these conditions, thereby undermining its eligibility for policy backing.

In particular, the proposal would result in significant adverse effects on nationally designated landscapes and seascapes, contrary to the requirements of Policy 11(d) and 11(e). Furthermore, there is insufficient evidence to demonstrate that the cultural significance of scheduled monuments and their settings would be preserved, as required by the policy. The safeguarding of island communities, a concern addressed under Policy 11(c), has also not been convincingly assured. These shortcomings collectively indicate a clear conflict with the policy's impact criteria.

Moreover, the ecological tests integral to Policy 11 have not been shown to be met based on the evidence submitted. This lack of assurance regarding ecological impact further weakens the proposal's alignment with the policy framework. In summary, the proposal's failure to satisfy these critical impact requirements means it cannot legitimately benefit from the support that NPF4 Policy 11 offers for renewable energy projects.

The proposal's mitigation measures fall short when compared against the comprehensive safeguards established by relevant NPF4 policies protecting nationally important landscapes, heritage assets, and biodiversity. Policy 11 must be considered alongside Policy 4(c) and 4(d), which explicitly protect National Scenic Areas and nationally significant landscapes from significant adverse impacts on their defining qualities. Additionally, Policy 7, particularly 7(h) concerning scheduled monuments and 7(c) and 7(d) regarding the settings of historic assets, imposes stringent requirements to preserve cultural significance. Policy 3 further demands robust ecological safeguards. The submitted evidence does not demonstrate that the proposed mitigation would adequately prevent significant harm to these designated assets, thereby failing to meet the combined intent and standards of these policies.

In light of the evidence, the proposal would cause significant adverse effects on nationally designated landscapes and seascapes. There is no satisfactory demonstration that the cultural significance of scheduled monuments and their settings would be preserved, nor that island communities would be protected in accordance with policy expectations. Furthermore, the ecological tests required under Policy 3 have not been shown to be capable of being met based on the information provided. Consequently, the proposal is in clear conflict with multiple NPF4 policies designed to safeguard nationally important landscapes, heritage assets, and biodiversity, and therefore should not be supported.

The proposal would result in adverse effects upon the landscape, heritage, and community interests safeguarded by the relevant terrestrial development plan policies, including those set out in the Argyll and Bute Local Development Plan 2. These detrimental impacts directly conflict with the objectives and protections established within the development plan framework. Furthermore, this inconsistency extends to National Planning Framework 4 when considered in its entirety. The applicant has not provided evidence to overcome these conflicts or to demonstrate compliance with the applicable policy requirements. Consequently, the proposal is

fundamentally at odds with the terrestrial development plan framework pertinent to land-based effects and should be refused on this basis.

1.1.918 Seascape, Landscape and Visual Effects

The applicant's written methodology, as set out in Appendix 16.1, notably lacks a defined distance threshold beyond which major effects are deemed to cease. However, analysis derived from the applicant's own Chapter 16 and Appendices 16.1 to 16.3, as detailed in a published Evidence Note supporting community objections, reveals a consistent pattern across all three assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of its inherent sensitivity or the extent of visibility. This demonstrates an implicit influence of distance on the assessment outcomes.

Further examination of the applicant's documentation highlights the explicit role that distance plays in shaping judgements. For instance, the assessment of a coastal area situated over 30 kilometres away describes the scale of change as small, explicitly attributing this to the viewing distance. Moreover, the Landscape Character synthesis categorises the magnitude of effect as High within roughly 20 kilometres, Medium between about 20 and 30 kilometres, and Low beyond approximately 30 kilometres for certain landscape types. This gradation underscores a systematic moderation of impact magnitude correlated with increasing distance.

The critical consequence of this approach is that the protective tests, which are fundamental to the planning assessment, are being applied to inputs that are understated. Since the magnitude is consistently reduced at distances coinciding with the locations of the most sensitive designated landscapes, the conclusions drawn from the assessment do not reliably represent the true effects that the Scottish Ministers are being asked to consider for consent. This calls into question the robustness and accuracy of the applicant's assessment methodology and its suitability for informing decision-making in this context.

While mitigation measures aim to reduce visual impacts, it is important to recognise that the visualisation materials underpinning the assessment have inherent limitations that constrain their effectiveness. NatureScot's visualisation guidance, which the applicant follows, explicitly states that printed visualisations cannot fully convey the scale perceived by a viewer in situ. Furthermore, the wireline drawings included within the same panoramic views share these constraints, as they remain technical renderings dependent on the photographic base rather than serving as independent corrections. Consequently, reliance on these visualisations may underestimate the true visual effects experienced on site.

The proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration of the night-time seascape character throughout its 35-year operational lifespan. This change is not merely a temporary inconvenience; from a policy perspective, granting consent effectively endorses the suitability of this seascape for wind farm use. Consequently, the decision carries significant implications for the intrinsic qualities of the night-time seascape, which must be carefully weighed against the benefits of the development.

The proposal's acknowledged effects on landscape and seascape interests are significant and engage multiple key policies, specifically NPF4 Policies 4(c), 4(d), 11(d), 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively serve to safeguard nationally important landscapes and seascapes, establishing a clear framework against which the proposal must be assessed.

However, the applicant has failed to substantiate that its conclusions regarding the scale of these effects align with its own established methodology. This lack of methodological consistency undermines the reliability of the impact assessment and calls into question the robustness of the evidence presented in support of the proposal. Consequently, there is a failure to demonstrate that the development would comply with the stringent protections afforded by the relevant policies.

In light of this, the proposal does not meet the necessary planning policy requirements designed to protect landscape and seascape interests of national importance. Therefore, on the basis of non-compliance with these fundamental policies, the application should not be supported.

1.1.919 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment fails to comply with the required methodology for evaluating effects on the setting of historic assets, thereby undermining the reliability of its conclusions regarding heritage impacts. Although the applicant claims to have adopted Historic Environment Scotland's recognised methodology—which mandates an evaluation of whether changes to setting affect the contribution setting makes to cultural significance and whether the integrity of setting is adequately retained—the assessment does not demonstrate that this evaluative step has been properly undertaken. Instead, the operational assessment focuses primarily on describing visual changes such as visibility, distance, monument prominence, retained views, screening, and skyline occupation. It then concludes that the integrity of setting is adequately retained without explicitly showing how this conclusion follows from the methodology's requirements. As emphasised in the Methodological Audit prepared independently from the applicant's Appendix 14.3, the assessment conflates visual change with adverse impact, contrary to the methodology's clear statement that visual change should not be equated directly with adverse effect. Consequently, the absence of a transparent and methodical evaluation of setting integrity calls into question the assessment's validity and the soundness of its heritage impact conclusions.

The applicant's 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.

The practical consequence of the identified deficiencies in the landscape assessment is that the heritage impact conclusions derived from it are fundamentally compromised. Specifically, where the landscape effects have been understated, as previously detailed, this understatement directly affects the reliability of the heritage conclusions that rely upon them. In other words, any analysis of heritage impacts that depends on an inaccurate or incomplete appraisal of landscape effects cannot be considered fully credible or robust.

This interdependence between landscape and heritage assessments means that the overall evaluation of the proposal's impact on heritage assets is likely to be overly optimistic. The failure to adequately capture the true extent of landscape effects results in a cascading effect, whereby the heritage conclusions fail to reflect the actual degree of harm. Consequently, decision-makers should treat these heritage impact findings with caution, recognising that their underpinning evidence may not accurately represent the real consequences for the historic environment.

The application fails to provide the necessary assurances that the cultural significance of internationally and nationally important heritage assets and their settings will be adequately protected. This shortcoming has a practical consequence in that it undermines the acceptability of the proposal, as the Scottish Ministers do not have before them the requisite assessment to support a conclusion that these heritage interests would be safeguarded.

This failure engages key policy provisions, notably NPF4 Policy 7(h) concerning scheduled monuments, alongside Policies 7(c) and 7(d) relating to their setting. Additionally, the application must be considered in light of GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan, all of which impose clear expectations for the protection of heritage assets and their contexts.

Given that the applicant has not demonstrated compliance with these established policy requirements, the proposal cannot be considered to meet the standards necessary for approval. Consequently, the application should be regarded as deficient in its protection of heritage assets and, therefore, unacceptable in its current form.

1.1.920 Effects on Island Communities, Tourism and the Local Economy

The applicant's own baseline assessments confirm that the island communities affected by this proposal rely heavily on visitors who are drawn by specific qualities: landscape, seascape, cultural heritage, tranquillity and remoteness. These attributes form the core attractions that sustain the local economy. Any alterations to these qualities would therefore have a direct and detrimental impact on the economic foundation of these communities. Such impacts would extend beyond economics, undermining local services, reducing population stability, and ultimately threatening the long-term viability of these island settlements. Given this dependency, the

proposal poses a significant risk to the fundamental economic and social sustainability of the island communities concerned.

In comparison to the detailed assessment of port communities, the applicant's approach to socio-economic impacts on island communities is notably insufficient. While the consultants acknowledged habitability as a potentially significant pathway for effects on island populations, no specific evaluation of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment in Chapter 18 addresses potential impacts at a regional scale, leaving the island communities—which directly face the development—without the benefit of an equivalent place-based analysis. Despite this omission, the assessment concludes that these island communities exhibit low sensitivity to tourism-related effects, a position that fails to reflect the unique circumstances of the islands.

The reliance on regional averages obscures the realities of small island economies, which differ fundamentally from broader regional profiles. These economies are highly concentrated in sectors most vulnerable to changes in the qualities that attract visitors, such as natural and cultural assets. Moreover, their dependence on increasing visitor numbers heightens rather than reduces sensitivity to any adverse impacts. To characterise these communities as having low sensitivity without a targeted, place-based analysis is not supported by evidence but rests on unsubstantiated assumption. This methodological flaw undermines confidence in the assessment's conclusions and the adequacy of proposed mitigation measures for island communities.

While mitigation measures have been proposed, they fall short when compared to the specific requirements set out for island communities under current policy and statutory duties. The proposal fails to meet the standards of GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions be founded on robust socio-economic evidence and a precautionary approach where evidence is insufficient. Furthermore, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 require that the interests of island communities are thoroughly assessed and given meaningful weight through engagement from the earliest stages to completion. The applicant has acknowledged the need for particular scrutiny of island communities but has not undertaken the necessary assessments to understand the potential effects on these populations. As a result, it has not demonstrated compatibility with sustainable island communities, nor has it discharged the statutory duties owed to them. This fundamental omission undermines the proposal's compliance with essential planning and legal requirements.

1.1.921 Ecology, Biodiversity and Habitats Regulations

The proposed development would bring substantial construction, operational, and decommissioning activities into an ecologically sensitive area over several decades. This scale and duration of disturbance carry a significant risk of adverse effects on the local marine environment. The presence of Priority Marine Features and Annex I habitats within the development site underscores the high ecological value of the area.

Surrounding waters are known to support important species, including seabirds, marine mammals, and basking sharks, all of which are vulnerable to habitat disruption and increased human activity. The cumulative impacts on these protected species could be considerable, given their reliance on the site for feeding, breeding, or migration.

Given these factors, careful consideration must be given to the potential environmental consequences before proceeding. The ecological sensitivity and importance of the site demand that any development proposals include robust measures to avoid or mitigate significant harm to Priority Marine Features and protected marine species.

The applicant's submission of a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan signals recognition of potential adverse impacts on the North Colonsay and Western Cliffs Special Protection Area, specifically concerning the guillemot population. Such documents are customarily prepared in circumstances where the integrity of a protected site cannot be confidently assured, indicating that the applicant does not rule out the possibility of an adverse effect. Moreover, the inclusion of these plans acknowledges that Scottish Ministers may reach a different conclusion regarding impacts on site integrity than the applicant. This submission is therefore a critical element of the application, intended to address potential adverse effects through derogation provisions and compensation measures, albeit without definitive assurance that such impacts can be fully avoided.

Mitigation, compensation proposals, and future monitoring measures, while important considerations, do not in isolation satisfy the stringent evidential requirements set out under the Habitats Regulations for granting consent to developments affecting protected sites. The competent authority must be satisfied beyond reasonable scientific doubt that the proposal will not adversely affect the integrity of the protected habitat. This high evidential standard places the burden of proof firmly on the applicant, who must demonstrate conclusively that the statutory tests are met prior to consent being lawfully granted. Proposals reliant solely on mitigation or compensation without clear evidence of their effectiveness in preventing harm fail to meet these rigorous legal thresholds.

This legal framework is further reinforced by relevant policies, including GEN 9 and GEN 13 of the National Marine Plan, alongside NPF4 Policies 3, 4(b), 4(e) and 4(f). Together, these policies underscore the imperative to prevent adverse effects on protected species and habitats, embedding the requirements of the Habitats Regulations into national planning policy. Consent decisions must therefore be aligned with these provisions, ensuring that no reasonable scientific doubt remains regarding the absence of adverse effects before development is permitted. This comprehensive approach safeguards environmental integrity while maintaining legal compliance.

The applicant's submitted evidence, notably their own derogation documents, reveals a significant shortfall in demonstrating compliance with the statutory tests designed to protect internationally important habitats and species. The degree of certainty provided is insufficient to satisfy these legal requirements, as

acknowledged within the applicant’s documentation itself. This failure directly undermines the fundamental protections afforded to such ecological features under the relevant statutory framework.

Given the applicant’s inability to meet these critical legal standards, the application cannot be considered compliant with the statutory safeguards intended to preserve internationally important ecological assets. Consequently, the case for granting consent is fundamentally weakened, as the necessary assurances for environmental protection remain unsubstantiated. It is therefore appropriate to conclude that consent should not be granted in the absence of clear demonstration that these statutory tests have been satisfied.

1.1.922 Cumulative and In-Combination Effects

The current assessment approach is fundamentally flawed as it fails to evaluate the project in its entirety, contrary to established legal principles. Only a portion of the development is presently before the Scottish Ministers, with critical components such as the export cable corridor and onshore transmission works deferred to future applications. These elements are indispensable for the wind farm’s operation, yet their environmental and cumulative effects are excluded from the principal decision-making process. This segmentation results in a fragmented evaluation, preventing a comprehensive understanding of the project's overall impact. Such an approach conflicts with the principle upheld in Raeshaw Farms, where the courts emphasised that projects must be assessed holistically rather than divided into smaller parts whose individual impacts might appear less significant. Consequently, the current methodology undermines the integrity of the assessment and should be reconsidered to ensure a complete and lawful evaluation of all project elements.

The cumulative impact assessment relies fundamentally on the findings established in the broader Environmental Impact Assessment, as detailed in the applicant’s evidence. This means that the baseline conditions for landscape, heritage, and socio-economic factors form the foundation upon which cumulative effects are evaluated. However, if these initial assessments understate the true extent of impacts, the cumulative assessment inherently inherits this deficiency.

Because the baseline is reduced, the assessment of combined effects from the proposed development alongside other existing, consented, and foreseeable projects is consequently understated. This approach risks overlooking the full magnitude of the cumulative impacts that may arise, thereby compromising the reliability of the overall environmental appraisal. It is essential that the baseline accurately reflects current conditions to ensure that the cumulative effects are neither underestimated nor misrepresented.

In light of this, the cumulative impact assessment as presented cannot be regarded as a fully robust or dependable evaluation of the combined effects. Without addressing the foundational understatements in the baseline assessments, there remains significant uncertainty regarding the true scale of cumulative impacts, which warrants further scrutiny before the proposal can be confidently supported.

The applicant's submission fails to meet the requirements set out in GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the Environmental Impact Assessment Regulations concerning project splitting. Unlike a comprehensive assessment that would encompass all related works, including deferred elements, the current approach does not reliably identify or evaluate the cumulative and in-combination effects of the proposal in its entirety. This omission undermines the ability to compare and consider appropriate mitigation measures effectively across the full scope of the project.

Given this deficiency, it is essential that the decision-making process explicitly addresses the treatment of the deferred works to ensure compliance with policy and regulatory frameworks. Without such consideration, the potential environmental impacts may be underestimated, leading to insufficient mitigation and an incomplete understanding of the proposal's overall effects. Accordingly, the application as submitted does not satisfy the necessary standards for environmental assessment and planning policy adherence.

1.1.923 Effects on Local Area

The applicant's assessment significantly underestimates the direct and substantial effects of the proposed development on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Although Islay and Colonsay lie immediately adjacent to the development area—Islay to the south-east and Colonsay to the east—the application predominantly considers Islay only as a potential project location rather than as a distinct island community subject to direct impacts. This approach fails to recognise that Islay's Atlantic-facing communities confront the nearest edge of a 448 square kilometre development zone, without any place-specific evaluation of consequences for their local setting, economic activities, or community life. Similarly, Colonsay and Oronsay's daily experience is defined by their seaward outlook facing the array directly. The North Colonsay and Western Cliffs Special Protection Area, located on Colonsay's coastline, forms the focus of the applicant's derogation case and compensation proposals, implicitly acknowledging that harm to the internationally protected seabird populations cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance situated within this community, has its open maritime setting inadequately addressed, reflecting the broader deficiencies identified in the heritage assessment. These omissions collectively undermine the reliability and completeness of the environmental and heritage impact evaluation.

The applicant's own Coastal Character assessment acknowledges that the Sound of Iona is of high sensitivity, with a direct orientation towards the proposed development area and extensive visibility. The assessment identifies a large geographical extent of change, approximately 21 kilometres, with turbines spanning around 39 degrees of the horizon, resulting in an overall effect deemed Moderate and Significant. The West Coast of Iona is similarly rated as highly sensitive with widespread visibility, and the applicant concedes significant effects for both residents and visitors across much of the island, including at Dùn Ì, the island's highest point. Furthermore, the applicant's baseline recognises Iona's monastic landscape—comprising the Abbey, the Nunnery, and the high crosses—as heritage of international importance, with significance intrinsically linked to pilgrimage, arrival by sea, and movement through

the landscape. Despite Historic Environment Scotland's request for additional viewpoints, including from the ferry crossing itself, the applicant has failed to provide a visualisation from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, a notable omission given its heritage context.

Community concerns further underscore the scale of the impact. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal, yet the applicant's own consultants identified habitability as a potential pathway of effect on this community, which has not been assessed. The perceived scale of the turbines can be contextualised by comparison with the landmark Ben Hynish on Tiree, which stands 141 metres high and is visible from Iona at approximately 33 kilometres. The largest turbines would surpass Ben Hynish by roughly 194 metres, despite being situated at about two-thirds of that distance. This comparison emphasizes the substantial visual intrusion and underlines that the applicant's assessment understates the significance of visual, community, and heritage impacts on Iona, thereby compromising the accuracy of the environmental and social impact evaluation.

The applicant's assessment insufficiently mitigates the significant visual, economic, and community impacts on Mull and the Ross of Mull coastal areas, particularly regarding designated landscapes and tourism-dependent communities. While some effects are acknowledged, such as those at Erraid and on the Core Paths of the Ross, and the significant impact on Fionnphort—the gateway to Iona and a critical point for visitor flow—the overall treatment of sensitive areas remains inadequate. The Ross of Mull South coastal area, judged to be of High sensitivity at 22 to 24 kilometres distance and attributed only Medium magnitude, demonstrates an underestimation of the true scale of impact. Similarly, across Mull, the applicant recognises significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Area, yet attributes no more than Medium magnitude to the Loch na Keal National Scenic Area, despite its High sensitivity over distances of 21 to 33 kilometres. This reliance on distance to downplay effects is further exemplified by the assessment of the Wilderness and Gribun Rocks coastal area, where the scale of change is deemed small solely due to viewing distances exceeding 30 kilometres. Critically, Mull's west-facing tourism economy, including wildlife boat operations and accommodation providers in western townships, depends on the integrity of the Atlantic seascape, which the development would industrialise. Yet, no place-based assessment has been provided for these communities, leaving a significant gap in understanding and addressing the cumulative impacts on landscapes and livelihoods.

The applicant's assessment of the impacts on wider seaboard designated landscapes and island communities appears to underestimate significant effects, particularly when compared to the mitigation standards typically applied to sensitive areas. For instance, Ulva, a community-owned island within the Loch na Keal National Scenic Area, is at the outset of its regeneration and relies heavily on the unspoilt seascape and setting, qualities that remain unassessed in the application despite being integral to the island's recovery. Similarly, Staffa, one of Europe's most celebrated small islands and also within the Loch na Keal National Scenic Area, lies approximately 35 kilometres from the development. This exceeds the 30 kilometre assessment boundary suggested by NatureScot, yet the applicant concludes the

effects there would be small and not significant, even though their own evaluation acknowledges the panoramic maritime qualities of the location.

Further, the Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed with High sensitivity at a distance of 28 to 32 kilometres but is attributed only Medium to Low magnitude of effect, justified by distance and retained landforms. This approach is similarly applied to the Scarba, Lunga and the Garvellachs National Scenic Area, situated approximately 35 to 40 kilometres away. Such treatment fails to adequately reflect the intrinsic qualities that underpin these designations. Taken together, these assessments omit the full extent of potential impacts on the natural and cultural qualities of these designated landscapes and the vulnerable island communities that depend on them, thereby undermining their protection and the integrity of the wider seaboard environment.

The practical consequence of the applicant's assessment is a significant underestimation of the visual and landscape impact on the island of Tiree. By attributing a Low magnitude of change to the South Tiree coastal area, despite its designation as of High sensitivity at approximately 35 kilometres distance, the evaluation fails to adequately reflect the scale of alteration that would result from the proposed development. This misjudgement risks misleading decision-makers and the public as to the true extent of effects on this sensitive environment.

Tiree's landscape character is exceptionally distinctive, defined predominantly by the expansive sea and sky that surround it. As a low-lying island with its highest elevation at Ben Hynish of only 141 metres, its open oceanic horizon is a fundamental element of its sense of place. The introduction of turbines reaching heights of up to 335 metres would create vertical structures far exceeding any existing features, thereby fundamentally altering the seascape. The applicant's conclusion of Low magnitude change is therefore incongruous with the island's openness and sensitivity, representing a serious understatement of the visual intrusion and consequent impact.

In light of the above, the assessment's reliability is compromised by this understated evaluation of effects on Tiree's sensitive and distinctive landscape character. A more accurate and robust appraisal is necessary to ensure that the scale and significance of change are properly recognised, thereby informing an appropriate planning decision that respects the island's unique environmental qualities.

While the applicant's assessment applies distance-based moderation to mitigate perceived effects on seascape receptors, this approach appears insufficient when considering communities with direct views and economic reliance on the seascape. For instance, Gigha, a community-owned island renowned nationally for its successful regeneration, faces the proposed development from the east. Despite its finely balanced community and economy, no specific examination of the potential impacts on Gigha has been undertaken, leaving a notable gap in the assessment's comprehensiveness.

Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas represent exactly the type of receptor to

which the applicant’s distance-based mitigation is applied, yet the significance of such views to local tourism and community character suggests a need for more detailed consideration beyond simple spatial separation.

Furthermore, the west coast of Kintyre encompasses a series of communities whose outlook, character, and visitor economy are intrinsically linked to the open Atlantic seaboard facing Islay, Jura, and adjacent waters. The Treshnish Isles, alongside other small islands and mainland coasts overlooking the development area, share this position. The absence of targeted assessment for these locations undermines confidence in the applicant’s conclusions and suggests that the potential effects on these seascape-dependent communities remain insufficiently understood.

The applicant’s environmental impact assessment systematically applies a distance-based approach that results in the moderation and discounting of significant effects on highly sensitive receptors located beyond approximately 20 kilometres. This methodology effectively diminishes the recognised magnitude of change experienced by these receptors, thereby understating the true extent of impact. Such an approach fails to account adequately for the lived experience of communities in these areas, whose exposure to effects is neither fully acknowledged nor assessed on a place-specific basis.

Taken together, the evidence demonstrates that beyond the 20-kilometre threshold, the applicant’s assessment consistently reduces the perceived severity of effects, creating a pattern of neglect towards the cumulative and contextual impacts on distant but sensitive locations. This systematic moderation undermines the integrity and completeness of the environmental impact assessment, as it does not provide a thorough evaluation of all potentially affected receptors. Without place-based assessments tailored to the circumstances of each community, the assessment falls short of its duty to comprehensively understand and mitigate environmental harm.

In conclusion, the reliance on a rigid distance criterion to discount effects beyond 20 kilometres compromises the robustness and fairness of the environmental impact assessment. To uphold the standards expected in planning and environmental evaluation, it is essential that significant effects on sensitive receptors, regardless of their distance, receive full and explicit consideration. Only through such rigorous and inclusive assessment can the decision-making process ensure that all affected communities are justly represented and environmental harms appropriately addressed.

1.1.924 Personal Observations

In addition to the planning matters above, I am personally concerned because: As a frequent visitor to the Western Isles of Scotland, particularly in my capacity as a leisure sailor, I believe the adverse aspects of impact of this project (through construction, operation, and decommissioning) has been deliberately underestimated by the applicants in order to weight the decision outcome in their favour. Evidence of the adverse impact other existent marine wind farms in the Irish Sea and off Norfolk and Suffolk Coasts clearly demonstrates that applicants for marine wind farms are deliberately underplaying the adverse impacts whilst

championing the positive impacts such as local job creation. This impartial approach must be re-balanced by the Planning Authority considering the application.

Based on my own local knowledge, I also wish to highlight that: The Sea scape and wildlife of these islands is a national treasure that belongs to the people of Scotland, the United Kingdom, and all those who visit these isles. The Scottish Government must protect that national treasure and not give it away to a private company for the price of a planning application and whatever planning gain the applicants are proposing. That natural heritage deserves being valued appropriately for the duration of this barbaric scheme

Finally, I would also ask the Scottish Ministers to consider: Please do not undervalue Scotland's natural heritage. It is a national treasure of inestimable value and should never be sold or given away from public ownership.

1.1.925 Further Comments

I am a member of the Royal Western Yacht Club of Scotland and a frequent visitor to this part of Scotland.

1.1.926 Summary

The proposal for the MachairWind Offshore Wind Farm fails to demonstrate compliance with the relevant statutory and policy requirements governing its determination. The applicant’s own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the local communities and heritage along this coastal region. Furthermore, independent reviews of the applicant’s documentation reveal that the extent of these impacts has been underestimated. Crucially, the necessary heritage assessment has not been undertaken. Additionally, while the effects on the island communities involved were identified, no formal assessment of these impacts has been completed. The ecological criteria applicable to the project have also not been shown to be achievable. It should be noted that Scottish Ministers are currently considering only part of the project.

In light of these deficiencies, I respectfully urge Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to reject the related marine licence application. Should the Ministers decide against refusal, I request that they require the submission of further environmental information alongside enhanced visual representations of the project. Moreover, I contend that the applications should not be determined without the benefit of a public inquiry, during which the concerns raised in this objection can be thoroughly examined. Regardless of the final decision, I also seek a clear and explicit statement from the Ministers addressing the impacts on cultural heritage and the affected island communities within their decision reasons.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 597
Dear Sir/Madam,

I hereby submit a formal objection to the proposals put forward by MachairWind Limited (ScottishPower Renewables) for the MachairWind Offshore Wind Farm, referenced under application numbers 00012385 and 00012386. These applications request consent pursuant to section 36 of the Electricity Act 1989 and a marine licence under Part 4 of the Marine (Scotland) Act 2010, respectively. I request that this objection be formally recorded, that I be registered as an objector, and that I receive notification of the final determination regarding these applications.

The proposals envisage the construction of an offshore wind farm with a generating capacity of around 2 gigawatts. The development would involve between 91 and 144 wind turbines, each with a maximum blade tip height of 335 metres, situated within a designated Windfarm Development Area spanning approximately 448 square kilometres of marine space. This area lies to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in close proximity to the islands and coastal communities of the southern Hebrides.

My objection is grounded in both planning and environmental considerations, evaluated against the applicable statutory and policy frameworks guiding the determination of these applications. It is important to emphasise that the evidential responsibility lies with the applicant, who must demonstrate—through robust and sufficient evidence—that all relevant statutory tests and policy criteria are met. Objectors are not obliged to prove the contrary. In this case, for the reasons detailed below, the applicant has failed to satisfy this burden of proof, and therefore, the applications should be refused.

1.1.927 Seascape, Landscape and Visual Effects

The practical consequence of the applicant’s assessment methodology is that it systematically underestimates the magnitude of effects on highly sensitive receptors located beyond approximately 20 kilometres from the development area. Although the methodology outlined in Appendix 16.1 does not explicitly define any distance threshold beyond which major effects cease, independent analysis based on the applicant’s own Chapter 16 and associated appendices reveals a consistent pattern: receptors more than 20 kilometres away are not assigned the highest magnitude of change, regardless of their sensitivity or the extent of visibility.

This implicit distance-based moderation is further confirmed by the applicant’s own documentation. For example, the assessment of a coastal area over 30 kilometres distant describes the scale of change as small due to the viewing distance. The Landscape Character synthesis similarly categorises magnitudes as High within approximately 20 kilometres, Medium between roughly 20 and 30 kilometres, and Low beyond about 30 kilometres for certain landscape types. Such gradations demonstrate that distance plays a decisive role in reducing assessed impacts even before considering other factors.

As a result, the protective tests intended to safeguard sensitive landscapes are being applied to inputs that are systematically understated at critical distances where

designated landscapes are located. This calls into question the reliability of the conclusions presented to the Scottish Ministers, as the methodology does not accurately reflect the true effects on receptors that lie beyond the approximately 20-kilometre threshold. Consequently, consent based on these assessments would rest on an incomplete understanding of the potential environmental impacts.

The applicant's submission follows NatureScot's visualisation guidance, which itself recognises inherent constraints in the visual evidence provided. Specifically, the guidance notes that printed visualisations cannot fully replicate the scale perceived by a viewer on site. Furthermore, wireline drawings, which are included within the same panoramic views as the photographs, share these limitations. They function as technical renderings embedded within the visualisation rather than serving as independent tools to correct or enhance the photographic representation. This indicates that while the visual materials offer useful illustrative support, they must be interpreted with caution due to their inability to capture the true spatial experience and scale as encountered in the field. Consequently, reliance on these visualisations alone may not provide a comprehensive understanding of the potential visual impacts, underscoring the need for supplementary assessment methods or site visits to accurately inform decision-making.

The proposal fails to comply with the requirements set out in key planning policies designed to safeguard nationally important landscape and seascape interests. Specifically, the identified effects engage National Planning Framework 4 (NPF4) Policies 4(c) and 4(d), 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively establish a clear framework for the protection and sustainable management of such sensitive environments.

Despite this policy context, the applicant has not convincingly demonstrated that its conclusions regarding the scale of the accepted effects align with its own stated methodology. This gap undermines confidence in the assessment's reliability and casts doubt on the extent to which the proposal respects the integrity of the protected landscapes and seascapes. Without robust evidence to show adherence to the relevant policy criteria, the proposal cannot be regarded as compliant.

In light of these findings, it is concluded that the proposal does not meet the necessary policy standards for safeguarding nationally important landscape and seascape assets. Consequently, it should not be supported in its current form, as it fails to demonstrate the essential compliance required by the pertinent planning policies.

1.1.928 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of heritage impacts fails to comply with the required methodology, thereby undermining the reliability of its conclusions regarding the integrity of setting. Although the applicant adopted Historic Environment Scotland's recognised methodology—which mandates evaluating whether changes affect the contribution setting makes to cultural significance and whether the integrity of setting is adequately retained—it stops short of fulfilling these requirements in practice. The applicant's assessment primarily describes visual changes, focusing on visibility, distance, monument prominence, retained views, screening, and skyline occupation.

However, as demonstrated by the Methodological Audit prepared in support of community objections, these descriptive elements do not amount to the critical evaluative step the methodology demands. The Audit, working solely from the applicant's Appendix 14.3, highlights that the assessment does not explicitly demonstrate how the integrity of setting has been assessed in accordance with the methodology. Without this essential evaluation, the conclusion that the integrity of setting is adequately retained lacks evidential foundation. Consequently, the assessment's failure to apply the methodology properly calls into question the validity of its heritage impact conclusions.

The applicant's own baseline assessment acknowledges that the cultural significance of the affected heritage assets is deeply rooted in a range of experiential and landscape qualities. These include aspects such as pilgrimage, arrival by sea, and movement through a living cultural landscape, as well as the interrelationships between monuments, spirituality, and their surrounding landscape and seascape. Importantly, these qualities are experienced dynamically through movement rather than from fixed viewpoints. Despite this recognition, Historic Environment Scotland's consultation responses, as recorded within the application, have highlighted the need for additional viewpoints to ensure these broader experiential and cultural qualities are adequately represented. This suggests that the current assessment may not fully capture the holistic nature of the cultural landscape and its intangible attributes. Therefore, it is essential that the assessment methodology be expanded to incorporate these wider perspectives, to provide a more comprehensive understanding of heritage impacts in line with the applicant's own baseline findings and statutory consultees' advice.

The deficiencies in the landscape assessment have a direct and practical consequence: they undermine the credibility of the heritage impact conclusions. This is because the heritage conclusions rely heavily on the findings of the landscape assessment. Where the landscape effects have been understated, as previously outlined, the heritage conclusions that are built upon this assessment necessarily inherit the same understatement. Consequently, any evaluation of heritage impacts based on these flawed landscape assessments cannot be considered robust or reliable. Therefore, the heritage impact conclusions should be treated with caution, given their dependence on an inadequate landscape assessment.

1.1.929 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development exhibit an exceptional dependence on visitors, whose presence is fundamentally motivated by the qualities identified in the applicant's own baseline assessments: landscape, seascape, cultural heritage, tranquillity, and remoteness. These attributes constitute the primary attractions drawing visitors to the area, forming the cornerstone of the local economy.

Any alteration to these defining qualities would directly undermine the economic foundation of these island communities. Such economic disruption would extend beyond immediate financial impacts, threatening the provision of essential services, the stability of local populations, and ultimately the long-term viability of these

communities. Consequently, the proposal poses a significant risk to the sustainability of the islands in both social and economic terms.

The applicant's socio-economic assessment is fundamentally flawed in its failure to adequately consider the specific impacts on island communities. While the applicant's own consultants acknowledged habitability as a potentially significant pathway for effects, no detailed assessment of the habitability of the affected islands was undertaken. Instead, the assessment in Chapter 18 focuses predominantly on regional port communities and offers no equivalent place-based evaluation of the island communities directly facing the proposed development. Despite this omission, the assessment concludes that these island communities are of low sensitivity to tourism-related effects, a conclusion that lacks a sound evidential basis.

This approach overlooks the unique economic characteristics of small island communities. Such economies are not simply regional averages; they are typically heavily concentrated in sectors closely tied to the qualities that attract visitors. The reliance on increasing visitor numbers does not diminish their sensitivity to change; rather, it heightens their dependence on those very qualities that may be at risk from the development. By failing to undertake a place-based analysis, the applicant's conclusion of low sensitivity is not grounded in evidence but rests on an unsubstantiated assumption.

Given these significant methodological shortcomings, the socio-economic assessment cannot be relied upon to fully understand or mitigate the impacts on island communities. A thorough, place-specific evaluation is essential to properly assess the potential effects and to ensure that appropriate measures are in place to protect these vulnerable communities. In the absence of such analysis, the application should not be supported.

1.1.930 Ecology, Biodiversity and Habitats Regulations

The proposed development site and its adjacent waters encompass Priority Marine Features and Annex I habitats, which are ecologically significant. Additionally, the surrounding marine environment supports populations of seabirds, marine mammals, and basking sharks. Introducing large-scale construction, operational activities, and eventual decommissioning over several decades poses a substantial risk of significant adverse environmental impacts to these sensitive ecological resources.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically addressing the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are typically prepared where it cannot be confidently ruled out that the proposed development would adversely affect the integrity of the protected site. Their inclusion in the application signals an acknowledgment by the applicant of potential environmental impacts that require careful consideration.

Such submissions indicate that, according to the applicant's own assessment, there remains a possibility that the Scottish Ministers might reach a different conclusion regarding adverse effects on the protected site's integrity. This reflects a precautionary approach, recognising the significance of the designated area and the

need for appropriate measures should impacts be confirmed. The derogation and compensation documents are therefore intended to provide a framework for mitigating any identified harm to the guillemot population.

While the submission of these documents demonstrates the applicant's awareness of potential issues and willingness to propose solutions, it also highlights an area of uncertainty within the assessment. The effectiveness of the compensation plan and the acceptability of derogation measures will ultimately require thorough scrutiny. It is essential that any determination on adverse effects and the adequacy of proposed mitigation is made with full regard to the protected status of the site and the conservation objectives set out in relevant policy.

The applicant correctly acknowledges that under the Habitats Regulations, consent for developments affecting protected sites may only be granted where the competent authority has ascertained that the proposal will not adversely affect the integrity of the site, except where the stringent derogation tests are satisfied. It is essential to recognise that consent can lawfully be granted only when there is no reasonable scientific doubt concerning the absence of adverse effects. Furthermore, the burden of demonstrating this rests squarely with the applicant, and measures such as mitigation, compensation proposals, and future monitoring, while potentially beneficial, do not in themselves suffice to prove that the statutory tests have been met.

This legal framework is reinforced by relevant planning policies, including GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). These policies collectively impose a high evidential standard to safeguard protected habitats and species, ensuring that development proposals must be supported by robust and conclusive scientific evidence before consent can be granted. The integration of these policies with the Habitats Regulations underlines the comprehensive and precautionary approach required in decision-making.

Given this context, it is imperative that any development proposal subject to these requirements must provide unequivocal scientific evidence demonstrating no adverse effect on the protected site's integrity. Reliance on mitigation or monitoring alone is insufficient to meet the legal and policy standards. Therefore, decision-makers should maintain rigorous scrutiny of the evidence presented, ensuring compliance with both the statutory tests and the accompanying planning policies before granting consent.

The applicant has failed to demonstrate that the statutory tests intended to protect internationally important habitats and species can be satisfied. This conclusion is drawn directly from the submitted evidence, including the applicant's own derogation documents, which reveal an insufficient degree of certainty regarding compliance with these legal requirements. Without clear assurance that the necessary protections will be met, the application falls short of the statutory standards designed to safeguard ecological features of international significance, thereby undermining any case for granting planning consent.

1.1.931 Effects on Local Area

The applicant's environmental and heritage impact assessment fails to adequately mitigate or even fully recognise the significant effects on the island communities of Islay, Colonsay, and Oronsay, particularly when compared to the scale and proximity of the proposed development. Although mitigation measures are outlined for certain ecological features, such as the seabird populations of the North Colonsay and Western Cliffs Special Protection Area, these do not extend to a comprehensive evaluation of the broader socio-economic and cultural impacts on these islands. The development area, encompassing 448 square kilometres, lies immediately north-west of Islay and west of Colonsay, yet the application primarily considers Islay as a potential project site rather than as a discrete community facing the nearest edge of the development. This approach neglects the place-based assessment necessary to understand the development's direct effects on Islay's Atlantic-facing communities, their economy, and their way of life. Consequently, the application's mitigation strategy is limited and does not address the full extent of potential harm.

Moreover, for Colonsay and Oronsay, the application acknowledges the presence of internationally protected seabird populations and proposes derogation and compensation plans related to the adjacent Special Protection Area. However, the assessment inadequately addresses the broader implications for the islands' seaward outlook, which is integral to daily life and community identity. Of particular concern is Oronsay Priory, a scheduled monument of national importance, situated within the affected community area. The heritage assessment's shortcomings, especially regarding the preservation of the monument's open maritime setting, remain unaddressed, undermining the reliability of the impact evaluation. Taken together, these deficiencies reveal a fundamental underassessment of the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, which calls into question the robustness and completeness of the applicant's environmental and heritage impact appraisal.

The applicant's assessment significantly underestimates the scale and significance of the visual, community, and heritage impacts on Iona, leading to an incomplete evaluation of environmental and social effects. The Coastal Character assessment identifies the Sound of Iona as having high sensitivity, with extensive visibility of the development area spanning approximately 21 kilometres and turbines extending across about 39 degrees of the horizon. This results in a moderate and significant overall effect that directly affects the ferry crossing between Fionnphort and Iona. Similarly, the West Coast of Iona is assessed as highly sensitive, with widespread visibility and acknowledged significant effects on residents and visitors, including at Dùn Ì, the island's highest point.

Iona's monastic landscape, comprising internationally important heritage assets such as the Abbey, Nunnery, and high crosses, is central to its cultural significance. The applicant's baseline recognises the importance of pilgrimage, arrival by sea, and movement through the landscape, yet Historic Environment Scotland's request for additional visual viewpoints—specifically from the ferry crossing and elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn—remains unfulfilled, with no visualisation provided from these critical perspectives. This omission undermines a comprehensive understanding of the heritage impact, failing to fully represent the development's intrusion into this highly sensitive setting.

Community concerns further underscore the inadequacy of the assessment. A household consultation revealed that 92 per cent of respondents on Iona object to the proposal, yet the applicant's consultants did not assess habitability, despite identifying it as a potential pathway of effect. The perceived scale of the turbines can be better appreciated by comparison with a familiar landmark: Ben Hynish on Tiree, which stands at 141 metres high and is visible from Iona at approximately 33 kilometres. The largest turbines would exceed Ben Hynish by around 194 metres while situated at roughly two-thirds of that distance, highlighting the disproportionate visual intrusion. Collectively, these factors demonstrate that the applicant's evaluation fails to capture the true extent of impacts on Iona, warranting a more rigorous and comprehensive reassessment.

1.1.932 Personal Observations

In addition to the planning matters above, I am personally concerned because: I would like to visit Iona one day, but the trip would be ruined as the applicant ruins the landscape

Based on my own local knowledge, I also wish to highlight that: I think the proposal ruins the heritage and natural state of Iona.

Finally, I would also ask the Scottish Ministers to consider: No

1.1.933 Further Comments

No

1.1.934 Summary

The proposal before the Scottish Ministers fails to satisfy the statutory and policy requirements applicable to its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the coastal communities and cultural heritage of the area. However, published reviews of the applicant's documents reveal that these impacts have been understated. Moreover, the necessary heritage assessment has not been conducted. While the impacts on island communities have been identified, they remain unassessed. Additionally, the ecological criteria stipulated have not been demonstrated as achievable. It is also pertinent that only a portion of the project is currently under consideration by the Scottish Ministers.

Given these shortcomings, it is urged that consent for the MachairWind Offshore Wind Farm be refused, along with the associated marine licence. Should the Ministers consider not refusing the application outright, it is requested that they require the submission of further environmental information and enhanced visualisations. Furthermore, it is recommended that the determination of the applications be deferred until after a public inquiry, enabling a thorough examination of the issues raised in this objection. Regardless of the outcome, it is also sought that the Ministers provide clear and explicit conclusions within their decision, specifically addressing the effects on cultural heritage and the impacted island communities.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 598
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, encompassing application 00012385 for consent under section 36 of the Electricity Act 1989 and application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications, submitted by MachairWind Limited (ScottishPower Renewables), seek approval for a substantial offshore wind development. Please record this letter as an official objection, register me accordingly, and ensure I am informed of the outcome of the decision process.

The proposed development entails the construction of an offshore wind farm with a generating capacity of approximately 2 gigawatts. The scheme would include between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip. The designated Windfarm Development Area extends over roughly 448 square kilometres of marine space located to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in proximity to other islands and coastal communities within the southern Hebrides.

My objection is grounded firmly in planning and environmental considerations, evaluated against the relevant statutory and policy frameworks that govern the determination of these applications. It is important to emphasise that the responsibility lies with the applicant to provide sufficient and compelling evidence to satisfy all applicable tests. Objectors are under no obligation to prove the contrary. Having reviewed the submissions and supporting documentation, I conclude that the applicant has failed to meet this evidential burden. Consequently, I contend that consent for this development should be refused.

1.1.935 Legislative and Policy Framework

The marine licence application under consideration fails to demonstrate compliance with the statutory requirements set out in Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland’s National Marine Plan. As authorisation decisions must be taken in accordance with the National Marine Plan unless relevant considerations indicate otherwise, the absence of demonstrated compliance with key General Policies—specifically GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts)—constitutes a fundamental procedural and substantive deficiency in the application.

The evidence explicitly identifies that the application contains omissions and deficiencies in addressing these policies, resulting in conflicts with the applicable legal and policy framework. This failure to provide sound evidence and to adequately assess cumulative impacts, historic environment considerations, natural heritage, and landscape effects undermines the statutory assessment process. Without full and robust compliance, the application cannot satisfy the legal threshold required for authorisation under the Marine (Scotland) Act 2010 and the National Marine Plan.

Given these significant shortcomings, the application does not meet the statutory criteria for granting consent. The identified deficiencies and conflicts weigh decisively against approval, and the marine licence should therefore be refused on the grounds that the proposal is not compliant with the statutory requirements and relevant policies of the National Marine Plan.

The applicant's submission acknowledges that National Planning Framework 4 (NPF4) is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. The proposal engages several key policies within NPF4, specifically Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy). However, the evidence provided by the applicant fails to demonstrate compliance with these policies. There are clear deficiencies and omissions in the submission regarding the protection and enhancement of biodiversity and natural places, as well as inadequate consideration of the impact on historic assets. Furthermore, the proposal does not satisfactorily address the energy policy requirements set out in Policy 11. These shortcomings indicate a failure to meet the comprehensive policy framework established by NPF4.

Where compliance with NPF4 has not been demonstrated, or where the evidence identifies deficiencies, omissions, or conflicts with the applicable legal and policy framework, these matters weigh decisively against the granting of consent. The applicant's failure to provide sufficient evidence of conformity with the statutory and policy requirements under NPF4, particularly in relation to biodiversity, natural places, historic assets, and energy, constitutes a fundamental flaw in the proposal. Consequently, the proposal is contrary to the relevant provisions of NPF4 and should be refused on these grounds.

The proposal fails to comply with the statutory requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which mandate that the likely significant environmental effects of the development must be identified, assessed, and reported prior to any determination. This failure to provide an adequate environmental impact assessment undermines the decision-making process by leaving the determining authority without a comprehensive understanding of the potential environmental consequences. Without this essential information, the proposal cannot be properly evaluated against the legal and policy framework designed to protect the environment, thereby rendering any consent premature and procedurally flawed.

Furthermore, the proposal does not demonstrate compliance with the Habitats Regulations, which require a thorough assessment of the effects on European protected sites in accordance with the applicable statutory tests. The absence of such an assessment, or any evidence that these tests have been satisfactorily met, constitutes a significant omission that conflicts directly with the legal obligations imposed by the Habitats Regulations. Given that compliance has not been demonstrated and deficiencies remain unaddressed, these failures weigh decisively against the granting of consent. The proposal's shortcomings in meeting these critical environmental safeguards represent a fundamental breach of statutory duties and must result in refusal.

The proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018, resulting in a fundamental procedural deficiency. This statutory requirement is clear that the interests of island communities must be explicitly taken into account and given due weight in the decision-making process. The absence of demonstrated compliance with this duty undermines the legitimacy of the proposal's assessment and decision framework.

The evidence confirms that where compliance with the Islands (Scotland) Act 2018 has not been shown, or where there are identifiable deficiencies, omissions, or conflicts with the applicable legal and policy framework, these shortcomings must weigh against the granting of consent. In this case, the proposal exhibits such deficiencies and omissions, failing to meet the statutory threshold for proper consideration of island community interests. This failure is not a minor procedural oversight but a substantive breach of the statutory duty imposed by the 2018 Act.

Accordingly, the proposal should be refused on the basis that it does not satisfy the legal requirements set out in the Islands (Scotland) Act 2018. The lack of proper consideration and weighting of island community interests constitutes a material conflict with the statutory framework, which decisively weighs against the granting of planning consent. The decision-making authority must uphold the statutory protections afforded to island communities by rejecting this application.

The applicant has failed to provide robust, objective, and proportionate evidence to demonstrate compliance with every relevant statutory duty, planning policy, and environmental assessment requirement. This failure represents a fundamental shortcoming in the application, as the evidential burden rests squarely with the applicant to prove that all legal and policy frameworks have been satisfied. The absence of such demonstration, coupled with identified deficiencies and omissions in the submitted evidence, directly conflicts with the applicable legal and policy framework. In accordance with established principles, these unresolved matters must weigh decisively against the granting of consent. Therefore, on the basis that the applicant has not fulfilled the necessary evidential responsibility to prove compliance, the application should be refused.

1.1.936 Conflict with National Planning Framework 4 and the Development Plan

In considering the proposal against the relevant policies within the National Planning Framework 4, it is apparent that the mitigation measures put forward do not adequately address the protections afforded to designated assets. Policy 11 must be read alongside Policies 4(c) and 4(d), which specifically safeguard National Scenic Areas and nationally important landscapes from significant adverse effects. Furthermore, Policies 7, including 7(h) concerning scheduled monuments and 7(c) and 7(d) relating to the setting of historic assets, as well as Policy 3 on biodiversity, establish a comprehensive framework for protection. The evidence shows that the proposed development would cause significant adverse effects to these nationally designated landscapes and seascapes, and the mitigation proposed falls short of preventing such harm.

Moreover, the submission has not demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, nor has it shown that

the interests of island communities would be adequately safeguarded. Crucially, the ecological assessments fail to meet the necessary tests outlined in Policy 3, with no convincing evidence that biodiversity impacts can be effectively mitigated. Taken together, these shortcomings confirm that the proposal conflicts with the suite of NPF4 policies designed to protect nationally important landscapes, heritage assets, and biodiversity, and therefore cannot be supported.

1.1.937 Seascape, Landscape and Visual Effects

The applicant acknowledges that the proposed development's effects engage several policies, specifically NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), GEN 7, and paragraph 4.28 of the National Marine Plan. However, the applicant has failed to demonstrate that its conclusions regarding the scale of these accepted effects align with its own assessment methodology. Moreover, there is a lack of evidence that the proposal complies with the policies designed to protect nationally important landscapes and seascapes. This deficiency undermines confidence in the applicant's assessment and indicates non-compliance with the relevant planning policies safeguarding landscape and seascape interests.

1.1.938 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment acknowledges that the cultural significance of the heritage assets in question arises from a complex interplay of experiential qualities, including pilgrimage, arrival by sea, movement through a living cultural landscape, and the interrelationships between monuments, spirituality, and the encompassing landscape and seascape, which are principally appreciated through movement rather than static viewpoints. Despite this recognition, Historic Environment Scotland's consultation responses, as documented within the application, have highlighted the need for additional viewpoints to ensure these broader cultural and experiential qualities are adequately represented. This indicates that the current baseline may not fully capture the depth of the cultural landscape's significance, raising concerns about the sufficiency of the applicant's heritage impact assessment.

The heritage impact conclusions rely substantially on the findings of the landscape assessment. However, as identified in the evidence, there is an understatement of landscape effects within that assessment. This understatement directly affects the heritage conclusions, causing them to inherit the same deficiencies. Consequently, the credibility of the heritage impact assessment is undermined by its dependence on a landscape analysis that does not fully capture the extent of landscape effects.

The application fails to comply with essential policy requirements regarding the protection of heritage assets, thereby undermining its overall acceptability. Specifically, it engages National Planning Framework 4 (NPF4) Policy 7(h) concerning scheduled monuments, alongside Policies 7(c) and 7(d) addressing the setting of heritage sites, as well as policy GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Despite these clear policy frameworks, the applicant has not provided sufficient evidence to demonstrate that the cultural significance of internationally and nationally important heritage assets, including their settings, will be preserved. Furthermore, the Scottish Ministers have not been presented with the comprehensive assessment required to reach a reasoned conclusion on these

matters. In light of these shortcomings, the application does not meet the necessary policy standards for heritage protection and should be refused accordingly.

1.1.939 Effects on Island Communities, Tourism and the Local Economy

The applicant's own baseline assessments confirm that the island communities affected by this proposal rely heavily on visitors who are drawn by specific qualities: landscape, seascape, cultural heritage, tranquillity and remoteness. These attributes form the core attractions that sustain the local economy. Any alterations to these qualities would therefore have a direct and detrimental impact on the economic foundation of these communities. Such impacts would extend beyond economics, undermining local services, reducing population stability, and ultimately threatening the long-term viability of these island settlements. Given this dependency, the proposal poses a significant risk to the fundamental economic and social sustainability of the island communities concerned.

When comparing the applicant's approach to mitigation, it becomes clear that their socio-economic assessment falls short, particularly in its treatment of island communities. While the assessment offers detailed analysis of potential port communities at a regional level, it neglects to undertake an equivalent place-based evaluation of the island communities directly facing the development. This omission is especially concerning given that the applicant's own consultants identified habitability as a potentially significant pathway through which the proposal could affect these island communities. Despite this recognition, no specific assessment of the habitability or the unique conditions of the affected islands was carried out, undermining the robustness of the socio-economic conclusions presented.

Furthermore, the assumption that island communities are of low sensitivity to tourism effects is not supported by evidence but rather reflects a lack of place-based analysis. Small island economies differ substantially from regional averages; their economies are often concentrated in sectors highly exposed to changes in the attributes that attract visitors. This concentration means that reliance on increasing visitor numbers does not diminish sensitivity but instead heightens dependence on the qualities that are potentially at risk from the development. Without a detailed and locally grounded assessment, the conclusion of low sensitivity cannot be considered reliable and risks overlooking significant adverse impacts.

In light of these considerations, it is clear that the socio-economic assessment methodology employed is flawed and insufficient to fully understand or mitigate the impacts on island communities. A more nuanced and place-specific approach is required to accurately capture the vulnerability of these communities and to inform appropriate mitigation measures. Until such an assessment is undertaken, the conclusions regarding the socio-economic effects on island communities must be regarded as tentative and incomplete.

The proposal has failed to provide the necessary socio-economic evidence to quantify its impact on island communities, thereby falling short of the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan. These policies mandate that decisions must be founded on robust evidence and adopt a precautionary approach where data is insufficient. Furthermore, NPF4 Policy 11(c)

alongside the Islands (Scotland) Act 2018 explicitly require that the interests of island communities are thoroughly assessed and meaningfully engaged with from the earliest stages through to the conclusion of the planning process.

Despite acknowledging the need for particular scrutiny of island communities, the applicant has not undertaken the comprehensive assessment required to understand the proposal's effects on these populations. This omission means that it remains unclear whether the development is compatible with the sustainability of island communities. The absence of this critical evaluation undermines confidence that the statutory duties owed to these communities, including proper consultation and consideration of their socio-economic wellbeing, have been discharged.

In light of these deficiencies, it is evident that the proposal does not meet the necessary planning and statutory standards for the protection and support of island communities. Without a clear demonstration that the interests of these communities have been given appropriate weight and that the proposal aligns with sustainable development principles, the application cannot be considered compliant with the relevant policies and legal obligations. Accordingly, this representation urges refusal on the grounds of non-compliance with policy and statutory duties regarding island communities.

1.1.940 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, which are acknowledged as ecologically significant within the site itself. Additionally, the surrounding waters provide a habitat for various protected species, including seabirds, marine mammals, and basking sharks. This establishes the site and its adjacent marine environment as areas of high ecological sensitivity and importance.

The proposed development would involve construction, operational, and decommissioning activities carried out on a very large scale over several decades. Given the presence of these sensitive habitats and protected species, such extensive and prolonged disturbance poses a substantial risk of significant adverse environmental effects. Careful consideration of these ecological factors is essential in the planning process to ensure the protection and conservation of the marine environment within and around the development site.

The applicant has provided a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically addressing the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are customarily prepared when it is not possible to exclude adverse effects on the integrity of a protected site. Their inclusion in the submission is therefore a notable aspect of the application, indicating that the applicant acknowledges potential impacts that may arise.

This approach reflects an understanding that the Scottish Ministers may ultimately reach a different conclusion regarding the likelihood of adverse effects on the protected site's integrity. By submitting these derogation and compensation measures, the applicant demonstrates a proactive stance aimed at addressing any such impacts in accordance with the derogation provisions. This recognition and

corresponding documentation are integral to the assessment of the application's compliance with relevant environmental protections.

1.1.941 Cumulative and In-Combination Effects

The applicant's submission fails to adequately address the requirements set out in GEN 21 and paragraph 4.85 of the National Marine Plan, as well as Policy 11(e) of the National Planning Framework 4 (NPF4), alongside the Environmental Impact Assessment (EIA) Regulations concerning project splitting. Specifically, there is an absence of a reliable identification and assessment of the cumulative and in-combination effects of the proposal. This deficiency undermines the holistic understanding of the project's overall environmental impact, as the effects of the project as a whole have not been comprehensively evaluated.

Given this shortcoming, it is imperative that the decision-making process explicitly considers the treatment of deferred works. Without such consideration, the planning authority cannot ensure full compliance with the aforementioned policies and regulatory frameworks. Therefore, it is requested that the deferred elements of the project be expressly addressed in the determination to secure a thorough and legally compliant assessment of all potential environmental effects.

1.1.942 Public Engagement, Site Selection and Environmental Information

The deficiencies in public participation and the timing of consultations have significantly undermined the legitimacy of the site-selection process, with practical consequences for the weight that the Scottish Ministers may reasonably place on it. The applicant requests substantial deference to the site-selection process; however, the quality of public engagement at both the plan and site-selection stages has been inadequate and this shortfall has persisted into the application stage. The application itself consists of many thousands of pages of technical material, yet the consultation period coincided with the busiest months for island communities, when residents are fully occupied with continuous work throughout the visitor season and when access to specialist advice is most limited. Meanwhile, the applicant has benefited from years of preparation supported by considerable professional and financial resources.

The National Marine Plan's Policy GEN 18 and the principles of effective public participation enshrined in the Aarhus Convention require that those affected must have a realistic and meaningful opportunity to engage in decisions of this scale. The conditions under which the affected communities were expected to respond plainly fall short of these standards. Consequently, it is imperative that the Scottish Ministers take these deficiencies into account when assessing the representations made, recognising the compromised nature of public participation in this process.

The Environmental Impact Assessment (EIA) submitted with the application serves as the primary evidential basis for the Scottish Ministers' determination. However, the critical consideration is not the extent of the assessment but its sufficiency. The application identifies potential pathways to significant environmental effects but fails to investigate them adequately. For instance, the landscape assessment presents outcomes that follow a distance-based pattern not supported by its stated methodology. Similarly, the heritage assessment does not convincingly apply its own

integrity test, and the socio-economic assessment lacks a place-based analysis pertinent to the affected islands. These shortcomings undermine the reliability of the conclusions drawn within the EIA.

Moreover, the application partially relies on future assessments, post-consent plans, monitoring arrangements, and additional approvals to address outstanding environmental matters. Such reliance is inconsistent with the requirements of the EIA Regulations, which mandate that likely significant effects be fully understood prior to determination. The Scottish Ministers are required to base their decision solely on the evidence before them, not on an expectation that unresolved issues will be satisfactorily addressed later. The applicant has therefore not demonstrated that the environmental information provided is adequate for the Scottish Ministers to make an informed decision on this application.

1.1.943 Effects on Local Area

The applicant's assessment acknowledges Islay and Colonsay as the closest islands to the proposed development, which lies immediately north-west of Islay and west of Colonsay. However, the evaluation primarily considers Islay in terms of its potential as a direct project location rather than as an affected island community in its own right. This approach overlooks the Atlantic-facing communities of Islay, which confront the nearest edge of a 448 square kilometre development area, without any place-based assessment of the impacts on their setting, economy, or community life. For Colonsay and Oronsay, the seaward outlook that is central to daily life directly faces the proposed array. Notably, the North Colonsay and Western Cliffs Special Protection Area forms Colonsay's coastline and is the focus of the applicant's derogation case and compensation plan, implicitly recognising that harm to the internationally protected seabird population there cannot be ruled out. Furthermore, Oronsay Priory—a scheduled monument of national importance—lies within this community's area, yet the identified deficiencies in the heritage assessment equally apply to the evaluation of its open maritime setting. Taken together, these points demonstrate that the applicant's assessment underestimates the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby undermining the reliability of the overall environmental and heritage impact evaluation.

The applicant's Coastal Character assessment recognises the Sound of Iona as an area of high sensitivity, noting its direct orientation towards the development site and extensive visibility across a large geographical extent. The assessment concludes a moderate and significant overall effect, spanning approximately 21 kilometres, with turbines visible across about 39 degrees of the horizon. Similarly, the West Coast of Iona is identified as highly sensitive with widespread visibility, and the applicant acknowledges significant effects on residents and visitors throughout much of the island, including at Dùn Ì, Iona's highest point.

Iona's monastic landscape, encompassing the Abbey, the Nunnery, and the high crosses, holds heritage of international importance, with significance closely tied to pilgrimage, arrival by sea, and movement through the landscape, as established in the applicant's baseline. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself; however, no visualisation has

been provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, limiting the completeness of the heritage impact assessment.

Community response further underscores the scale of concern, with a household consultation revealing that 92 per cent of respondents on Iona object to the proposal. Despite habitability being identified by the applicant's consultants as a potential pathway of effect on the local community, this has not been assessed. The perceived scale of the development's visual impact can be contextualised by comparing the turbines with the familiar landmark of Ben Hynish on Tiree, which stands at 141 metres and is visible from Iona at approximately 33 kilometres; the largest turbines would exceed Ben Hynish's height by around 194 metres at roughly two-thirds of that distance. These points collectively indicate that the applicant's assessment may underestimate the true scale and significance of visual, community, and heritage impacts on Iona.

The applicant's assessment insufficiently mitigates the significant visual, economic, and community impacts on Mull and the Ross of Mull coastal areas, particularly regarding designated landscapes and tourism-dependent communities. While some effects are acknowledged, such as those at Erraid and on the Core Paths of the Ross, and the significant impact on Fionnphort—the gateway to Iona and a critical point for visitor flow—the overall treatment of sensitive areas remains inadequate. The Ross of Mull South coastal area, judged to be of High sensitivity at 22 to 24 kilometres distance and attributed only Medium magnitude, demonstrates an underestimation of the true scale of impact. Similarly, across Mull, the applicant recognises significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Area, yet attributes no more than Medium magnitude to the Loch na Keal National Scenic Area, despite its High sensitivity over distances of 21 to 33 kilometres. This reliance on distance to downplay effects is further exemplified by the assessment of the Wilderness and Gribun Rocks coastal area, where the scale of change is deemed small solely due to viewing distances exceeding 30 kilometres. Critically, Mull's west-facing tourism economy, including wildlife boat operations and accommodation providers in western townships, depends on the integrity of the Atlantic seascape, which the development would industrialise. Yet, no place-based assessment has been provided for these communities, leaving a significant gap in understanding and addressing the cumulative impacts on landscapes and livelihoods.

The applicant's assessment acknowledges the effects on designated landscapes within the Loch na Keal National Scenic Area, including Ulva, Staffa, Jura, and the Scarba, Lunga and Garvellachs National Scenic Area, but this evaluation underestimates significant impacts on these sensitive sites and their communities. Ulva, a community-owned island at the onset of regeneration, depends fundamentally on its unspoilt seascape and setting—qualities directly threatened by the proposal—yet no specific assessment of effects on this vulnerable, re-establishing community has been undertaken. Staffa, renowned as one of Europe's most celebrated small islands and situated roughly 35 kilometres from the development, lies beyond the approximately 30 kilometre boundary within which NatureScot requested assessment of National Scenic Area effects. Nevertheless, the applicant concludes that the scale of change at Staffa would be small and the effect not significant, despite acknowledging the island's panoramic maritime

qualities. Similarly, the Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed at a High sensitivity level within 28 to 32 kilometres, but the applicant attributes only Medium to Low magnitude of effect, citing distance and retained landforms as mitigating factors—an approach that downplays the fundamental character underpinning the designation. The Scarba, Lunga and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres away, is treated in the same manner. Taken together, these assessments fail to fully recognise or address the significant effects on important designated landscapes and the fragile island communities whose natural and cultural qualities are integral to their identity and recovery.

The applicant's assessment recognises the South Tiree coastal area as having High sensitivity at a distance of approximately 35 kilometres, yet attributes only a Low magnitude of change to the effects of the proposed development. This evaluation appears inconsistent given the acknowledged sensitivity of the receptor and its considerable distance from the site.

Tiree's landscape is uniquely characterised by its exceptionally low-lying topography, with its highest point, Ben Hynish, reaching merely 141 metres. The island's defining features are the expansive sea and sky, presenting an open oceanic horizon. The introduction of turbines up to 335 metres in height would create vertical elements unprecedented in Tiree's seascape. Consequently, the applicant's conclusion of a Low magnitude of change in such an exposed and sensitive environment significantly understates the true extent of the impact, rendering the overall evaluation unreliable.

The applicant's assessment fails to consider significant effects on several mainland and island communities whose direct views and economic interests are closely tied to the seascape within the proposed development area. Notably, Gigha—a community-owned island renowned nationally for its regeneration—faces the development site from the east, yet the impact on its delicate community balance and economy remains unexamined. This omission undermines the thoroughness of the assessment.

Similarly, Ardnamurchan Point, the most westerly location on the British mainland, offers panoramic vistas along the Hebridean seaboard that attract visitors throughout the peninsula. These exceptional seaward views constitute receptors of a highly sensitive nature, yet the applicant's reliance on distance-based moderation in their analysis disregards their importance. The west coast of Kintyre presents a comparable case, where a sequence of communities derives its character and visitor economy from outlooks towards Islay, Jura, and the open Atlantic waters beyond. The Treshnish Isles and adjacent small islands and mainland coasts with direct views to the development area share this vulnerability.

Given the substantial roles these visual and economic connections play in defining local community identity and sustainability, the absence of their consideration in the assessment compromises its comprehensiveness and validity. A proper evaluation of these receptors is essential to ensure that potential adverse effects are appropriately understood and mitigated.

1.1.944 Personal Observations

In addition to the planning matters above, I am personally concerned because: I have been a frequent visitor to areas affected by, especially Mull, Iona and Tiree. I am appalled that this development on such an inappropriate scale is being considered in an area of such significance.

Based on my own local knowledge, I also wish to highlight that: Iona, wildlife on the islands and in the sea

1.1.945 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the relevant statutory and policy requirements governing its determination. The applicant's own documentation acknowledges significant impacts upon nationally designated landscapes, as well as on the cultural heritage and communities along this coastal region. Independent reviews of the submitted materials reveal that these impacts have been understated, with a comprehensive heritage assessment notably absent. Moreover, while effects on the island communities impacted by the development were identified, no formal assessment of these impacts has been undertaken. The ecological criteria necessary for approval have not been demonstrated to be achievable. Additionally, it should be noted that only a portion of the project is currently subject to consideration by the Scottish Ministers.

In light of these shortcomings, it is respectfully urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm and decline to grant the associated marine licence. Should the Ministers decide against refusal, it is requested that they require the submission of further environmental information alongside enhanced visual representations. Furthermore, it is recommended that the applications be determined only following a public inquiry, thereby allowing thorough examination of the concerns raised within this objection. Regardless of the final decision, it is also requested that the Ministers provide explicit conclusions in their decision statement concerning the effects on cultural heritage and the affected island communities.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 599
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, detailed in application 00012385 for consent under section 36 of the Electricity Act 1989, alongside application 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications have been lodged by MachairWind Limited, trading as ScottishPower Renewables. I request that this objection be officially recorded, that I be recognised as an objector, and that I receive notification of the determination of these applications.

The project in question seeks approval for an offshore wind energy development with an installed capacity of approximately 2 gigawatts. It proposes between 91 and 144 wind turbines, each reaching a maximum height of 335 metres to blade tip. The proposed site covers some 448 square kilometres of marine area located north-west of Islay and to the west of Colonsay, situated approximately 21 kilometres from Iona and in proximity to various islands and coastal communities within the southern Hebrides.

This objection is grounded in planning and environmental concerns assessed within the statutory and policy frameworks governing the determination of these applications. It is important to emphasise that the responsibility lies squarely with the applicant to demonstrate, through robust and sufficient evidence, that all relevant statutory tests and policy requirements are met. Objectors, conversely, carry no obligation to disprove the proposals. Having considered the material submitted and the applicable criteria, it is clear that the applicant has failed to satisfy these burdens. Consequently, permission for the development should be withheld.

1.1.946 Legislative and Policy Framework

The application before the Scottish Ministers fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989. This Schedule explicitly requires the applicant to have regard to the desirability of preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, as well as protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant must take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The Scottish Ministers, in determining this application, are similarly bound to have regard to these statutory duties.

The evidence provided does not establish that these requirements have been adequately addressed. There is a clear absence of demonstrated compliance, and the application contains deficiencies and omissions in relation to the necessary consideration and mitigation of impacts on the specified natural and cultural heritage interests. These shortcomings represent a conflict with the applicable legal and policy framework governing such proposals.

Given these unresolved uncertainties and failures to meet the statutory obligations under Schedule 9, the application cannot be considered to have satisfied the

essential legal criteria. Consequently, these matters weigh decisively against the granting of consent.

The marine licence application under Part 4 of the Marine (Scotland) Act 2010 fails to demonstrate compliance with the statutory requirements of Scotland's National Marine Plan, specifically the General Policies GEN 4, GEN 6, GEN 7, GEN 9, GEN 13, GEN 18, GEN 19, and GEN 21, along with their associated paragraphs. The application lacks sufficient evidence to confirm that the proposal adequately addresses co-existence with other marine users, protects the historic environment, conserves landscape and national scenic areas, safeguards natural heritage, ensures meaningful engagement, provides sound evidence, and accounts for cumulative impacts. This absence of demonstrated compliance constitutes a fundamental deficiency in the statutory assessment process.

Given these evidential shortcomings and omissions, the application conflicts with the applicable legal and policy framework governing marine licencing decisions. As established, where compliance has not been demonstrated or where deficiencies exist, such matters weigh decisively against the granting of consent. Therefore, the marine licence application should be refused on the grounds that it does not meet the mandatory requirements of the Marine (Scotland) Act 2010 and the National Marine Plan policies.

The proposal fails to demonstrate compliance with the key policies of National Planning Framework 4, notably Policies 3, 4, 7, and 11, which address biodiversity, natural places, historic assets, and energy respectively. The application does not provide sufficient evidence to show that these policies have been met, and no adequate mitigation measures have been presented to address the identified shortcomings. This absence of demonstrated compliance and mitigation undermines the proposal's conformity with the statutory duties and legislative requirements that must be applied alongside the Framework.

National Planning Framework 4 is a significant material consideration in the determination of this application, and its policies must be fully engaged and satisfied. The evidence submitted reveals deficiencies and omissions in the assessment of impacts on biodiversity and natural places, as well as inadequate consideration of effects on historic assets. Furthermore, the proposal does not meet the energy policy requirements set out in Policy 11. These failures constitute clear conflicts with the applicable legal and policy framework, which weigh decisively against the granting of consent.

Given the lack of demonstrated compliance and the presence of unresolved conflicts with National Planning Framework 4, the proposal cannot be considered acceptable in planning terms. The statutory and policy framework requires that where such deficiencies exist, they must be addressed before consent is granted. In this case, the evidence confirms that these matters remain outstanding, and therefore the application should be refused.

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017, alongside the equivalent marine works regulations, mandate that the likely significant environmental effects of any proposal must be identified, assessed, and

reported prior to determination. Additionally, the Habitats Regulations require that the effects of the proposal on European protected sites be assessed in accordance with the applicable statutory tests. These legal requirements establish a clear procedural and evidential framework that must be satisfied to ensure informed decision-making and environmental protection.

In this case, compliance with these statutory duties has not been demonstrated. The evidence identifies deficiencies and omissions in the environmental impact assessment and habitats regulations assessment submitted with the proposal. Such failures constitute a conflict with the applicable legal and policy framework. As a matter of law and planning policy, these unresolved shortcomings weigh decisively against the granting of consent for the development. Without a complete and compliant assessment, the proposal cannot lawfully proceed.

The proposal fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities be properly considered and given due weight in the decision-making process. The submitted evidence does not show that these statutory obligations have been met. This omission constitutes a clear deficiency and procedural failure in the application. As established by the Act and confirmed in the supporting evidence, where such compliance is not demonstrated, or where deficiencies and omissions exist, these factors must weigh against the granting of consent. Therefore, the proposal should be refused on the basis that it does not adequately consider or address the interests of island communities as required by the Islands (Scotland) Act 2018.

The applicant has failed to provide robust, objective, and proportionate evidence to demonstrate compliance with all relevant statutory duties, planning policies, and environmental assessment requirements. This lack of satisfactory evidence means that the applicant has not met the essential evidential burden necessary to prove that the proposal aligns with the full scope of legal and policy frameworks governing the development.

Given this failure to demonstrate compliance, and in light of identified deficiencies and omissions within the submitted evidence, the proposal conflicts with applicable legal and policy requirements. Such unresolved conflicts and evidential shortcomings must weigh decisively against the granting of planning consent in this case.

1.1.947 Conflict with National Planning Framework 4 and the Development Plan

The practical consequence of the proposed development is that it fails to meet the impact criteria established in NPF4 Policy 11, thereby undermining the policy’s intended support for renewable energy projects. Although NPF4 Policy 11 endorses renewable energy development, this support is expressly conditional upon compliance with its specified impact criteria, including those concerning effects on communities, landscapes, seascapes, and other receptors. The proposal does not adhere to these requirements, resulting in significant adverse outcomes that cannot be justified within the policy framework.

More specifically, the proposal would cause substantial harm to nationally designated landscapes and seascapes, which are afforded particular protection

under Policy 11(d) and 11(e). Furthermore, the submission fails to demonstrate that the cultural significance of scheduled monuments and their settings would be preserved, as required by the policy. The lack of evidence to safeguard the integrity of these heritage assets is a critical shortcoming. In addition, the proposal does not convincingly show that island communities, which Policy 11(c) seeks to protect, would be adequately safeguarded from detrimental impacts arising from the development.

Finally, the ecological considerations set out in the policy have not been satisfactorily addressed. The evidence submitted does not establish that the ecological tests can be met, leaving significant uncertainties regarding potential environmental harm. Taken together, these deficiencies mean that the proposal conflicts with NPF4 Policy 11's impact criteria in multiple respects. Consequently, it cannot be supported as compliant with the national planning framework's requirements for responsible and sustainable renewable energy development.

In considering the proposal alongside the relevant National Planning Framework 4 policies, it is evident that the mitigation measures fall short when compared to the stringent protections afforded to designated assets. Policy 11 works in conjunction with Policy 4(c) and 4(d), which collectively safeguard National Scenic Areas and nationally important landscapes from significant adverse effects on the qualities for which they are designated. Additionally, Policies 7 and 3 provide further protection for scheduled monuments, their settings, and biodiversity, setting a high threshold for demonstration of safeguarding cultural and ecological values.

The evidence presented indicates that the proposal conflicts with these policies in several material respects. There would be significant adverse effects on nationally designated landscapes and seascapes, an outcome directly at odds with the protections under Policy 4. Furthermore, the application fails to demonstrate that the cultural significance of scheduled monuments and their settings would be adequately protected in accordance with Policy 7(h), 7(c), and 7(d). The safeguarding of island communities, a consideration implicit within these policies, has also not been shown to be addressed satisfactorily.

Ecologically, the proposal does not meet the required tests set out under Policy 3. The submitted evidence does not confirm that the ecological impacts can be adequately mitigated or compensated for, thus failing to demonstrate compliance with the biodiversity protections integral to the NPF4. Taken together, these deficiencies underline that the proposal does not accord with the suite of policies designed to protect nationally important landscapes, heritage assets, and biodiversity.

The proposal would result in significant adverse effects on the landscape, heritage, and community interests safeguarded by the Argyll and Bute Local Development Plan 2. These impacts directly conflict with the policies designed to protect such terrestrial assets within the development plan framework.

Given these identified harms, the proposal is fundamentally at odds with the relevant terrestrial development plan policies, reflecting a clear inconsistency that cannot be

reconciled. This conflict extends to the National Planning Framework 4 when considered in its entirety.

In conclusion, the applicant has failed to demonstrate that the proposal aligns with or can be justified against the established development plan framework. Therefore, the proposal should be refused planning permission on the grounds of its incompatibility with the statutory planning policy regime.

1.1.948 Seascape, Landscape and Visual Effects

The practical consequence of the applicant's assessment methodology is that it underestimates the magnitude of effects on highly sensitive receptors located beyond approximately 20 kilometres from the development area. Despite the absence of any explicit distance threshold in the applicant's written methodology in Appendix 16.1, an independent Evidence Note, based entirely on the applicant's own Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern: no highly sensitive receptor beyond this distance is attributed the highest magnitude of change, regardless of its sensitivity or the extent of visibility.

This implicit reliance on distance is further demonstrated within the applicant's own documents. For example, the assessment of a coastal area situated over 30 kilometres away concludes that the scale of change is small due to the viewing distance. Additionally, the Landscape Character synthesis categorises magnitude as High within roughly 20 kilometres, Medium between about 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. Such gradations, while not explicitly stated as thresholds, effectively moderate the assessment outcomes based on distance.

The consequence of this approach is that protective tests for sensitive designated landscapes, which often lie at or beyond these critical distances, are applied to understated inputs. This systematic moderation of magnitude at key distances undermines the reliability of the conclusions drawn. As a result, the effects described do not provide an accurate or dependable basis for the Scottish Ministers to grant consent for the proposed development.

The practical consequence of relying on the submitted visualisation materials is that they do not provide a fully accurate representation of how the development will appear in reality. As acknowledged by NatureScot's visualisation guidance, which the applicant follows, printed visualisations cannot replicate the true scale perceived by a viewer in the field. This inherent limitation means that stakeholders and decision-makers are not presented with a visual assessment that fully captures the real-world experience.

Moreover, the wireline drawings included within the same panoramic projections share these limitations because they depend on the underlying photographic imagery. Rather than serving as independent tools to correct or enhance the visual impression, they are technical renderings embedded within the visualisation process. Consequently, their ability to provide additional clarity or compensate for the shortcomings of the photographs is restricted.

Given these constraints, it is important to approach the visual evidence with caution and acknowledge that it cannot be relied upon as a definitive guide to the development's visual impact. Decision-making should therefore consider these technical and perceptual limitations to ensure a balanced and informed assessment.

When considering the potential effects of the proposed development on the night-time seascape character, it is important to weigh the impact of the introduced lighting against existing conditions and any feasible mitigation measures. The 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 throughout the stated 35-year operational life. While mitigation measures may reduce the visual prominence of lighting, the fundamental change to the natural darkness of the seascape cannot be fully negated.

Furthermore, the duration of the development's operational life does not diminish the policy significance of the harm caused. Although the 35-year period is finite, consenting to this development signifies a policy acceptance that this seascape is appropriate for wind farm use. Therefore, the decision carries implications beyond the temporary nature of the lighting, effectively endorsing a new character for the area during that time and potentially setting a precedent for future developments.

In balancing these considerations, the introduction of lighting presents a notable and permanent change to a presently unlit seascape that must be acknowledged within the policy framework. While mitigation can be sought to lessen the visual impact, the fundamental alteration remains, and the decision to approve the development must reflect a careful judgement that this character change is acceptable within the wider planning objectives for the area.

The applicant acknowledges that the proposed development would result in certain effects that engage specific policies within the planning framework, notably NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively serve to safeguard landscape and seascape interests of national significance, ensuring that developments do not cause unacceptable harm to these valued environments.

However, the applicant has failed to substantiate that its assessment of the scale of these effects aligns with the methodology it employs. There is a lack of clear demonstration that the proposal complies with the protective requirements set out for nationally important landscapes and seascapes. Consequently, the proposal does not meet the necessary standards established by the relevant policies, thereby calling into question its acceptability in planning terms.

1.1.949 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment adopts Historic Environment Scotland's recognised methodology for evaluating effects on the setting of historic assets, a framework developed and refined through consultation with that body. This methodology emphasises the need to evaluate whether changes to setting affect the contribution setting makes to the cultural significance of heritage assets and whether the integrity of setting is adequately retained, explicitly cautioning against equating visual change

directly with adverse impact. However, a published Methodological Audit prepared in support of community objections, working solely from the applicant's Appendix 14.3, identifies a critical shortcoming in the operational assessment. While the assessment identifies heritage attributes such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it fails to demonstrate how the integrity of setting has been evaluated in line with the applicant's own accepted methodology. The Audit highlights that the assessment describes visual changes but does not perform the necessary evaluative step to establish whether the integrity of setting is preserved, a deficiency apparent in all examined worked examples. This omission undermines the reliability of the conclusions drawn about heritage impacts and calls into question the thoroughness of the applicant's assessment.

While the applicant's assessment acknowledges the cultural significance of the affected heritage assets, highlighting attributes such as pilgrimage, arrival by sea, movement through a living cultural landscape, and the interplay between monuments, spirituality, and their surrounding landscape and seascape, these qualities are primarily experienced through movement rather than fixed viewpoints. Notably, Historic Environment Scotland, as recorded in the application's consultation responses, has requested additional viewpoints to ensure these broader experiential qualities are adequately represented. This suggests that the current assessment may insufficiently capture the full cultural landscape and the dynamic nature of the heritage experience. Therefore, a more comprehensive evaluation incorporating these wider perspectives is necessary to fully understand and mitigate potential impacts on the heritage assets.

The heritage impact conclusions presented rely significantly on the findings of the landscape assessment. According to the evidence, any understatement of landscape effects directly influences and diminishes the accuracy of the heritage conclusions that are derived from them. This interdependence suggests that if the landscape assessment fails to fully capture the extent or significance of the effects, the subsequent evaluation of heritage impacts will inevitably reflect that same understatement.

This reliance raises concerns about the overall credibility of the heritage conclusions. By building upon an assessment that potentially downplays landscape effects, the heritage analysis may not adequately account for the full scope of impacts, thereby undermining its robustness. It is therefore essential that the landscape assessment be thorough and accurate, as deficiencies in this area compromise the validity of the heritage impact conclusions that depend upon it.

The application engages National Planning Framework 4 (NPF4) Policy 7, specifically subsections (h) concerning scheduled monuments and (c) and (d) relating to the settings of heritage assets, alongside GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Despite this, the applicant has failed to demonstrate that the cultural significance of both internationally and nationally important heritage assets, as well as their settings, will be adequately protected. Crucially, the Scottish Ministers have not been provided with the comprehensive assessment necessary to substantiate such a conclusion. Without this essential evidence, the proposal falls short of meeting key policy requirements for heritage protection, thereby undermining its acceptability within the planning framework.

1.1.950 Effects on Island Communities, Tourism and the Local Economy

The island communities subject to this proposal rely to an exceptional degree on visitors, whose presence is directly linked to the intrinsic qualities identified in the applicant's own baselines: landscape, seascape, cultural heritage, tranquillity, and remoteness. These attributes are not incidental but foundational to the islands' economic vitality, underpinning the visitor economy that sustains local businesses, services, and employment opportunities.

Any alterations to these defining characteristics would therefore have a profound impact, striking directly at the economic base upon which these communities depend. This, in turn, threatens the broader social sustainability of the islands by undermining essential services, diminishing population retention, and ultimately compromising their continuing viability. The proposal's potential to diminish the very qualities that attract visitors must be recognised as a fundamental risk to the long-term resilience of these island communities.

The applicant's failure to assess the habitability of the affected islands has practical consequences that undermine confidence in the socio-economic conclusions presented. While their own consultants identified habitability as a significant potential impact pathway, the subsequent assessment in Chapter 18 addresses only regional port communities in detail, neglecting any comparable place-based analysis of the island communities directly facing the proposed development. This approach results in an unsupported conclusion that these island communities exhibit low sensitivity to tourism effects, which risks overlooking specific and localized vulnerabilities.

This methodological flaw is particularly concerning given the unique economic characteristics of small island communities. Their economies are concentrated in sectors highly sensitive to changes in the qualities that attract visitors, and increased dependence on visitor numbers intensifies this sensitivity rather than diminishes it. The absence of a detailed, place-based assessment renders the conclusion of low sensitivity not as evidence-based but as an unsubstantiated assumption. Therefore, the socio-economic assessment as presented is insufficient to understand or mitigate the potential impacts on island communities.

There remains significant uncertainty regarding the proposal's compliance with the necessary planning and statutory requirements relating to island communities. The relevant policy framework, including GEN 19 and paragraph 4.81 of the National Marine Plan, mandates that decisions must be founded on robust socio-economic evidence and adopt a precautionary approach where such evidence is insufficient. Additionally, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 impose a clear duty to assess and give weight to the interests of island communities through meaningful engagement throughout the decision-making process. This proposal falls short of these standards.

The applicant has acknowledged that island communities warrant particular scrutiny but has failed to undertake the comprehensive assessment required to understand fully the proposal's effects upon these communities. Consequently, it has not demonstrated compatibility with the objective of sustaining viable island communities, nor has it discharged the statutory duties owed to them. In light of

these deficiencies, the proposal cannot be considered compliant with the established policy and statutory framework protecting island communities.

1.1.951 Ecology, Biodiversity and Habitats Regulations

The proposed development site and its adjacent waters encompass Priority Marine Features and Annex I habitats, which are ecologically significant. Additionally, the surrounding marine environment supports populations of seabirds, marine mammals, and basking sharks. Introducing large-scale construction, operational activities, and eventual decommissioning over several decades poses a substantial risk of significant adverse environmental impacts to these sensitive ecological resources.

The applicant has provided a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically addressing the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are customarily prepared when it is not possible to exclude adverse effects on the integrity of a protected site. Their inclusion in the submission is therefore a notable aspect of the application, indicating that the applicant acknowledges potential impacts that may arise.

This approach reflects an understanding that the Scottish Ministers may ultimately reach a different conclusion regarding the likelihood of adverse effects on the protected site's integrity. By submitting these derogation and compensation measures, the applicant demonstrates a proactive stance aimed at addressing any such impacts in accordance with the derogation provisions. This recognition and corresponding documentation are integral to the assessment of the application's compliance with relevant environmental protections.

The applicant acknowledges that under the Habitats Regulations, consent for developments affecting protected sites may only be granted where the competent authority has ascertained that the proposal will not adversely affect the integrity of the site, unless the stringent derogation tests are satisfied. It is emphasised that consent can lawfully be granted only where no reasonable scientific doubt remains regarding potential impacts. The burden of proof lies with the applicant to demonstrate this high evidential standard.

Furthermore, the applicant recognises that mitigation, compensation proposals, and future monitoring, while important, do not by themselves satisfy the statutory tests required under the Habitats Regulations. This rigorous approach ensures that all potential effects on protected habitats and species are thoroughly assessed before any consent is granted, reflecting the precautionary principle embedded within the legislation.

This legal framework is supported and reinforced by relevant policy provisions, including GEN 9 and GEN 13 of the National Marine Plan and Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. Together, these policies establish a comprehensive and robust framework to safeguard protected sites, ensuring that decisions on consent are made with the utmost regard to environmental protection and legal compliance.

There remains significant uncertainty as to whether the application complies with the statutory requirements designed to safeguard internationally important habitats and species. The evidence submitted, notably the applicant's own derogation documents, clearly indicates that the necessary degree of certainty to satisfy these statutory tests has not been achieved. This failure to demonstrate compliance fundamentally undermines the justification for granting consent, as the legal protections for these ecological features must be upheld without compromise. Consequently, in light of this unresolved doubt, the application should not be approved.

1.1.952 Cumulative and In-Combination Effects

The practical consequence of considering only a portion of the project at this stage is that a comprehensive evaluation of its overall impacts is fundamentally undermined. The export cable corridor and the onshore transmission works, which are essential for the wind farm's operation, are not included in the current application but are instead deferred to future consenting processes. This fragmentation means that the Scottish Ministers are making decisions without full knowledge of the cumulative effects, potentially overlooking significant environmental and operational implications that only become apparent when all components are assessed together.

This approach runs counter to established legal principles governing environmental assessment. The courts, notably in the Raeshaw Farms case, have affirmed that a project must be assessed in its entirety rather than being divided into smaller parts whose individual impacts might appear less significant. By effectively "salami-slicing" the project, the current methodology diminishes the perceived scale and consequence of the development, which could result in inadequate mitigation measures and insufficient scrutiny of the project's true footprint and effects on the environment and local communities.

Therefore, it is imperative that the assessment process be reconsidered to encompass all interdependent elements of the project simultaneously. Only through a holistic evaluation can decision-makers fulfil their statutory duties and ensure that all potential impacts are properly identified, understood, and addressed. Failing to do so risks setting a precedent that undermines the integrity of the planning system and the protections it affords to the environment and public interest.

The mitigation measures proposed in the Environmental Impact Assessment rely heavily on baseline assessments that have been demonstrated to understate the extent of landscape, heritage, and socio-economic effects. This foundational understatement consequently limits the scope and effectiveness of any mitigation strategy, as the true magnitude of impacts is not fully recognised from the outset. Without an accurate baseline, proposed measures may fail to address the full range of adverse effects, thereby diminishing their overall efficacy and potentially allowing cumulative impacts to remain unchecked.

Furthermore, the cumulative impact assessment itself is rendered unreliable due to this flawed baseline. As the cumulative assessment depends on the findings of the earlier, understated evaluations, the combined effects of the current proposal alongside existing, consented, and foreseeable developments are similarly underestimated. This results in a cumulative impact appraisal that does not reflect

the genuine scale of combined effects on the environment and local communities, undermining the robustness of the planning process and the protection of valued assets.

The evidence presented in document S01 identifies a significant shortfall in the applicant's submission concerning compliance with established planning policies and environmental regulations. Specifically, the proposal engages with GEN 21 and paragraph 4.85 of the National Marine Plan, alongside NPF4 Policy 11(e) and the stipulations of the Environmental Impact Assessment (EIA) Regulations regarding project splitting. Despite these clear requirements, the applicant has failed to satisfactorily demonstrate that the cumulative and in-combination effects of the proposal, or the effects of the project in its entirety, have been reliably identified and assessed. This omission raises concerns about the adequacy of the environmental appraisal and the overall transparency of the proposal's impacts.

In light of this, it is essential that the decision-making process explicitly addresses the treatment of deferred works associated with the project. Without a comprehensive and coherent assessment of these elements, there is a risk that the environmental and planning implications may be underestimated or overlooked. To ensure adherence to relevant policy and regulatory frameworks, and to uphold the integrity of the planning process, the deferred works must be expressly considered and their cumulative effects thoroughly evaluated before any determination is made.

1.1.953 Public Engagement, Site Selection and Environmental Information

The consultation process associated with the site-selection and application stages has exhibited significant deficiencies in public participation, which critically undermines the legitimacy of the decision-making framework. The applicant places considerable weight on the site-selection process, rendering the quality of public engagement directly material to the determination. However, the extensive technical documentation submitted spans many thousands of pages, and the consultation period has coincided with the peak months of the year for island communities. During this time, local residents are engaged continuously in the visitor season, while access to specialist advice is notably limited. This disparity is accentuated by the applicant's prolonged preparation period, supported by substantial professional and financial resources, highlighting an imbalance that compromises effective participation.

Furthermore, the requirements set out in GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, mandate that those affected must have a realistic opportunity to engage meaningfully in decisions of such significance. The conditions under which the affected communities have been expected to respond fall short of these standards. It is therefore imperative that Ministers give careful consideration to these shortcomings in public participation when evaluating the representations submitted, recognising the impact these procedural inadequacies may have on the fairness and integrity of the site-selection process.

When comparing the mitigation measures proposed within the application, it becomes apparent that reliance on future assessments, post-consent plans,

monitoring, and additional approvals is insufficient to meet the requirements of the Environmental Impact Assessment (EIA) Regulations. The Regulations mandate that likely significant effects must be fully understood prior to determination, not deferred for resolution at a later stage. This approach undermines the fundamental purpose of the EIA as the principal evidential basis for the Scottish Ministers' decision-making process, as it leaves critical uncertainties unresolved at the point of consent.

Furthermore, a detailed examination of the environmental information reveals significant shortcomings that compromise its adequacy. The landscape assessment, for instance, reaches conclusions based on a distance pattern not supported by its own stated methodology. Similarly, the heritage assessment fails to demonstrate proper application of its integrity test. The socio-economic assessment is deficient in that it lacks a place-based analysis of the affected islands, a vital component for understanding local impacts. Collectively, these deficiencies indicate that the application does not provide a sufficiently comprehensive or robust evidential foundation. Consequently, the Scottish Ministers cannot be satisfied that the environmental information before them is adequate to enable an informed decision in accordance with statutory requirements.

1.1.954 Effects on Local Area

The applicant's assessment recognises Islay and Colonsay as the closest islands to the proposed development, which lies immediately north-west of Islay and west of Colonsay. However, the evaluation principally approaches Islay as a potential project location rather than considering it as a distinct island community that will be directly affected. Notably, the Atlantic-facing communities of Islay are situated adjacent to the nearest edge of the 448 square kilometre development area, yet the application fails to provide a place-based assessment of how this proximity will impact the community's setting, economy, or daily life. This omission raises concerns about the thoroughness of the environmental and social impact analysis for Islay, given its unique exposure and relationship to the development site.

For Colonsay and Oronsay, the seaward outlook is integral to daily life, directly facing the proposed array. The North Colonsay and Western Cliffs Special Protection Area, located on Colonsay's coastline, is central to the applicant's derogation case and compensation strategy, acknowledging that harm to the internationally protected seabird populations of these cliffs cannot be entirely ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance, lies within this community and is vulnerable to impacts on its open maritime setting. The shortcomings identified in the heritage assessment for other assets apply equally here, undermining confidence in the adequacy of the heritage impact evaluation. Taken together, these points demonstrate an underassessment of the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby weakening the overall reliability of the environmental and heritage impact appraisal.

The applicant's Coastal Character assessment recognises the Sound of Iona as an area of High sensitivity with direct orientation towards the development, extensive visibility, and a large geographical extent of change. This assessment notes effects on the ferry crossing between Fionnphort and Iona, concluding an overall effect that is Moderate and Significant across approximately 21 kilometres, with turbines

extending over about 39 degrees of the horizon. Similarly, the West Coast of Iona is identified as highly sensitive with widespread visibility, and the applicant acknowledges significant effects on residents and visitors across much of the island, including at Dùn Ì, Iona's highest point. Despite this, the scale and significance of these visual impacts appear to be understated in the applicant's evaluation, particularly when considering familiar visual references. For instance, Ben Hynish on Tiree, which is 141 metres high and visible from Iona at around 33 kilometres, would be overtopped by the largest turbines by approximately 194 metres at roughly two-thirds of that distance, indicating a far greater perceived scale than conveyed by the applicant.

Beyond visual effects, the applicant's assessment inadequately addresses the profound heritage and community impacts on Iona. The island's monastic landscape, including the Abbey, the Nunnery, and the high crosses, is of international importance, with significance intrinsically linked to pilgrimage, arrival by sea, and movement through the landscape, as acknowledged in the applicant's baseline studies. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet no visualisation is provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, a notable omission given the heritage context. Furthermore, a household consultation on Iona revealed that 92 per cent of respondents object to the proposal, yet the applicant's own consultants identified habitability as a pathway of potential effect on this community, which was never formally assessed. Taken together, these omissions and underestimations compromise the accuracy and completeness of the environmental and social impact evaluation regarding Iona, warranting a more robust and comprehensive assessment of the significant effects on this sensitive and internationally important island.

The applicant's assessment acknowledges significant effects on several key coastal communities and landscapes of Mull and the Ross of Mull, yet the scope and depth of this evaluation remain insufficient to fully capture the scale and nature of the potential impacts. Specifically, the Ross of Mull South coastal area is recognised as having High sensitivity at distances of approximately 22 to 24 kilometres, with effects attributed a Medium magnitude. The applicant concedes significant impacts at Erraid and on the Core Paths of the Ross, as well as at Fionnphort, which serves as the gateway to Iona and the principal embarkation point for visitors. This location is notably the community most directly linked to the flow of visitors, whose experience the applicant admits would be significantly affected. Moreover, across Mull, significant effects are accepted on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is consistently assessed as having High sensitivity at distances between approximately 21 and 33 kilometres, yet the applicant attributes only a Medium magnitude of effect. This suggests a dissonance between the recognised sensitivity of these landscapes and the extent of the acknowledged impact.

A critical example of the applicant's reliance on distance-based reasoning is evident in the treatment of the Wilderness and Gribun Rocks coastal area. Here, the assessment concludes that, given the viewing distance of over 30 kilometres, the scale of change is small. This approach fails to consider the intrinsic qualities of the seascape and its integral role in supporting Mull's west-facing tourism economy,

including wildlife boat operations and the accommodation provision within its western townships. The development's industrialising effect on the Atlantic seascape threatens these economic and community assets, yet none of these communities have been afforded a detailed, place-based assessment. This omission undermines the adequacy of the applicant's evaluation and overlooks the interconnected visual, economic, and social impacts that arise from the proposed development, particularly in areas so reliant on their natural and cultural landscapes for tourism and community identity.

The applicant's assessment underestimates the practical consequences for several designated landscapes and island communities by excluding or downplaying significant effects. Ulva, located within the Loch na Keal National Scenic Area, is a community-owned island undergoing early-stage regeneration. This small, re-establishing community's recovery is intrinsically linked to the preservation of the unspoilt seascape and setting that the development would affect, yet no dedicated assessment of impacts on Ulva has been undertaken. Similarly, Staffa, also within the Loch na Keal National Scenic Area and renowned as one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development area—beyond the 30-kilometre limit suggested by NatureScot for assessing effects on National Scenic Area qualities. Despite acknowledging the island's panoramic maritime qualities, the applicant concludes that the scale of change would be small and the effect not significant, a position that risks overlooking the sensitivity and importance of this well-known landscape.

Further afield, the Jura National Scenic Area, situated about 28 to 32 kilometres from the development, is characterised by high sensitivity due to its wild, undeveloped Atlantic outlook, which forms the basis of its designation. The applicant attributes only a Medium to Low magnitude of impact here, citing factors such as distance, apparent scale, and retained landforms as justification for this moderation. The Scarba, Lunga, and Garvellachs National Scenic Area, lying approximately 35 to 40 kilometres away, is treated similarly, with potential effects minimised without detailed consideration of the cumulative or specific landscape qualities at stake. Taken together, these assessments suggest a pattern of insufficient recognition of the development's wider impacts on important seaboard designated landscapes and vulnerable island communities, thereby undermining the protection of their natural and cultural qualities.

The practical consequence of the applicant's assessment is a significant underestimation of the visual and landscape impact on the island of Tiree. By attributing a Low magnitude of change to the South Tiree coastal area, despite its designation as of High sensitivity at approximately 35 kilometres distance, the evaluation fails to adequately reflect the scale of alteration that would result from the proposed development. This misjudgement risks misleading decision-makers and the public as to the true extent of effects on this sensitive environment.

Tiree's landscape character is exceptionally distinctive, defined predominantly by the expansive sea and sky that surround it. As a low-lying island with its highest elevation at Ben Hynish of only 141 metres, its open oceanic horizon is a fundamental element of its sense of place. The introduction of turbines reaching heights of up to 335 metres would create vertical structures far exceeding any

existing features, thereby fundamentally altering the seascape. The applicant's conclusion of Low magnitude change is therefore incongruous with the island's openness and sensitivity, representing a serious understatement of the visual intrusion and consequent impact.

In light of the above, the assessment's reliability is compromised by this understated evaluation of effects on Tiree's sensitive and distinctive landscape character. A more accurate and robust appraisal is necessary to ensure that the scale and significance of change are properly recognised, thereby informing an appropriate planning decision that respects the island's unique environmental qualities.

The applicant's assessment fails to consider significant effects on mainland and island communities that have direct visual and economic connections to the seascape in question. Notably, Gigha, a community-owned island emblematic of island regeneration, faces the development from the east, yet the potential impacts on its delicate community balance and economy remain unexplored. Similarly, Ardnamurchan Point—the most westerly tip of the British mainland—offers panoramic views along the Hebridean seaboard, attracting visitors whose experience depends on the unspoiled seaward panoramas. These receptors, critical to the local visitor economy, appear to be dismissed through a distance-based moderation approach. Furthermore, the west coast of Kintyre encompasses a series of communities whose identity and tourism are closely tied to the open Atlantic seaboard views towards Islay, Jura, and adjacent waters. The Treshnish Isles and other small islands and mainland coasts with sightlines to the development area share this vulnerability. The omission of these communities from thorough assessment undermines the comprehensiveness and reliability of the applicant's environmental evaluation.

The applicant's environmental impact assessment employs a distance-based methodology that systematically moderates the magnitude of change and discounts the effects on highly sensitive receptors located beyond approximately 20 kilometres. This approach results in a significant underestimation of impacts, as it applies a generalized attenuation without accounting for the specific characteristics or vulnerabilities of the affected receptors. Consequently, the communities residing in these more distant locations have not been subjected to any detailed, place-based assessment, leaving a critical gap in the understanding of potential adverse effects.

This methodological limitation undermines the overall integrity and completeness of the environmental impact assessment. By failing to recognise and appropriately evaluate significant effects beyond the arbitrary 20-kilometre threshold, the applicant's approach neglects the nuanced realities of landscape sensitivity and community experience. Such systematic discounting risks the marginalisation of affected populations and compromises the robustness of environmental decision-making processes. It is therefore essential that assessments adopt a more nuanced and receptor-specific approach to accurately capture and address the full extent of environmental impacts.

1.1.955 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy requirements governing its determination. The applicant's own assessment acknowledges significant impacts on nationally designated landscapes, as well as on the coastal communities and their heritage. However, published analyses of the applicant's documentation reveal that these impacts have been understated. Crucially, the necessary heritage assessment has not been undertaken. Furthermore, while the adverse effects on the island communities have been identified, no assessment of these impacts has been conducted. The ecological criteria required by law remain unproven as achievable. It is also notable that only a portion of the project is currently before the Scottish Ministers for consideration.

In light of these deficiencies, it is respectfully urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm and deny the related marine licence. Should the Ministers be inclined to grant consent, it is requested that additional environmental information and enhanced visual representations be secured. Moreover, the application should be determined only following a public inquiry, allowing a thorough examination of the concerns raised in this objection. Regardless of the final decision, it is further requested that the Ministers provide clear, reasoned conclusions on the effects of the proposal on cultural heritage and the island communities affected.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.

Member of the public 600
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, corresponding to application numbers 00012385 for consent under section 36 of the Electricity Act 1989 and 00012386 for a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These submissions, lodged by MachairWind Limited (ScottishPower Renewables), concern the development of an offshore wind farm with a generating capacity of approximately 2 gigawatts. The project envisions installation of between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip, situated within a designated Windfarm Development Area spanning around 448 square kilometres of marine environment northwest of Islay and west of Colonsay. Notably, the site lies about 21 kilometres from Iona and is proximate to various islands and coastal settlements in the southern Hebrides.

The following exposition outlines my objection grounded in planning and environmental considerations, framed within the statutory and policy parameters applicable to these applications. It is essential to emphasise that the onus lies firmly on the applicant to establish, through robust and sufficient evidence, that all relevant statutory tests and policy requirements are met. Objectors bear no obligation to demonstrate the contrary. Upon careful scrutiny, the evidence submitted fails to satisfy these statutory thresholds, thereby justifying refusal of consent. I request that this objection be formally registered and that I be kept informed of the determination of these applications.

1.1.956 Legislative and Policy Framework

The application before the Scottish Ministers raises significant uncertainty regarding compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989. This Schedule explicitly requires the applicant to have regard to the desirability of preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, as well as protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant must take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The evidence submitted fails to demonstrate that these statutory duties have been adequately addressed, leaving a fundamental gap in the application’s legal and policy compliance.

In addition to the lack of demonstrated compliance, the evidence identifies clear deficiencies and omissions in the applicant’s consideration of these statutory requirements. There is no satisfactory explanation or assessment showing that the applicant has properly accounted for the preservation of natural beauty or the conservation of protected flora and fauna. Similarly, the application does not sufficiently address the protection of sites, buildings, or objects of architectural, historic, or archaeological interest, nor does it provide convincing mitigation measures for any adverse effects. These shortcomings represent a direct conflict with the statutory framework that governs the determination of this application.

Given these unresolved uncertainties and the failure to meet the statutory duties under Schedule 9, the application cannot be considered compliant with the legal requirements imposed by the Electricity Act 1989. As established in the evidence, where compliance has not been demonstrated, or where deficiencies and conflicts with the applicable legal and policy framework exist, these matters weigh decisively against the granting of consent. It is therefore incumbent upon the Scottish Ministers to refuse the application on the basis of these fundamental statutory and evidential failings.

The marine licence application fails to comply with the statutory requirements set out in Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland's National Marine Plan. As authorisation decisions must be taken in accordance with the National Marine Plan unless relevant considerations indicate otherwise, this non-compliance is a fundamental procedural and legal defect that weighs decisively against granting consent.

Specifically, the application does not demonstrate compliance with key General Policies integral to the statutory assessment. These include GEN 4 on Co-existence, GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 and paragraph 4.85 addressing Cumulative Impacts. The absence of evidence confirming adherence to these policies constitutes a material deficiency in the application.

Where such compliance has not been demonstrated, or where the evidence identifies deficiencies, omissions, or conflicts with the applicable legal and policy framework, these matters must be given significant weight against the proposal. In this case, the application's failure to meet these statutory and policy requirements undermines the legitimacy of the authorisation sought and provides clear grounds for refusal.

The proposal fails to provide the required comprehensive environmental impact assessment and habitats regulations assessment as mandated by law. Under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations, it is a statutory requirement that the likely significant environmental effects of the development be fully identified, assessed, and reported prior to any determination. Furthermore, the Habitats Regulations impose a clear duty to assess the effects of the proposal on European protected sites in strict accordance with the applicable statutory tests.

In this case, compliance with these legal obligations has not been demonstrated. The submitted evidence reveals deficiencies and omissions in the environmental impact assessment and habitats regulations assessment, resulting in a failure to meet the necessary statutory standards. Such shortcomings constitute a direct conflict with the established legal and policy framework governing environmental protection and habitat conservation.

Given these unresolved deficiencies and the absence of adequate assessment, the proposal does not satisfy the mandatory requirements of the relevant environmental

legislation. Consequently, these failures weigh decisively against the granting of consent for the development.

The proposal fails to demonstrate compliance with the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be considered and given due weight in the decision-making process. This statutory requirement is not met, as the application lacks any substantive evidence that these interests have been properly assessed or integrated into the planning rationale.

The absence of such consideration constitutes a significant procedural and substantive deficiency. The approved evidence confirms that where compliance with the Islands (Scotland) Act 2018 is not demonstrated, or where there are omissions or conflicts with the legal and policy framework, these shortcomings must weigh against the granting of consent. In this case, the failure to address the statutory duty to island communities directly conflicts with the applicable legal requirements.

Accordingly, the proposal should be refused on the basis that it does not meet the mandatory obligations set out in the Islands (Scotland) Act 2018. The lack of proper consideration and weighting of island community interests represents a fundamental flaw that undermines the legitimacy of the decision-making process and justifies withholding planning permission.

1.1.957 Conflict with National Planning Framework 4 and the Development Plan

The proposal under consideration would result in significant adverse effects on multiple nationally designated assets, including landscapes, seascapes, historic monuments, and biodiversity. Specifically, it fails to comply with a suite of policies within the National Planning Framework 4 (NPF4) that collectively safeguard these invaluable resources. Policy 11 operates in conjunction with Policy 4(c) and 4(d), which protect National Scenic Areas and other nationally important landscapes from substantial negative impacts on the qualities that justify their designation. Additionally, Policy 7, particularly Policy 7(h) relating to scheduled monuments and Policies 7(c) and 7(d) concerning the settings of historic assets, imposes strict requirements to preserve cultural significance. Policy 3 further mandates robust protection and enhancement of biodiversity. The evidence submitted does not demonstrate that these rigorous policy tests have been met.

In analytical terms, the proposal conflicts fundamentally with these protective policies. It would inflict significant adverse effects on nationally designated landscapes and seascapes, undermining the very qualities for which these areas are recognised. The cultural significance of scheduled monuments and their settings has not been shown to be adequately protected, nor has sufficient assurance been provided that island communities would be safeguarded. Furthermore, the ecological criteria required by Policy 3 have not been demonstrated to be achievable based on the submitted evidence. Consequently, the proposal cannot be considered compliant with the relevant NPF4 policies protecting designated assets, indicating a clear policy conflict that weighs heavily against its approval.

In comparison to available mitigation measures, the proposal fails to adequately address the adverse impacts it would have on the landscape, heritage, and

community interests protected by the terrestrial development plan framework, including the Argyll and Bute Local Development Plan 2. The identified conflicts with these policies are clear and significant, indicating that the proposal would cause harm to the local environment and cultural assets. Consequently, it is evident that the proposal is inconsistent with both the development plan and the National Planning Framework 4 when considered in their entirety. The applicant has not provided sufficient evidence to demonstrate that these conflicts can be overcome or mitigated to an acceptable degree. Therefore, the proposal does not align with the relevant terrestrial development plan framework and should be regarded as contrary to established planning policy.

1.1.958 Seascape, Landscape and Visual Effects

There is significant uncertainty regarding the applicant's assessment methodology, particularly in relation to distance thresholds and how they influence the evaluation of landscape effects. Notably, the applicant's written methodology in Appendix 16.1 does not specify any distance beyond which major effects cease. However, an independent Evidence Note, drawing solely on the applicant's Chapter 16 and associated appendices, reveals a consistent pattern across all assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is ever attributed the highest magnitude of change, regardless of its inherent sensitivity or the extent of visibility.

The applicant's own documentation further illustrates the implicit role that distance plays in moderating judgements. For example, an assessment of a coastal area more than 30 kilometres away explicitly states that, due to viewing distance, the scale of change is considered small. Additionally, the Landscape Character synthesis delineates a pattern where a High magnitude of effect is recognised within roughly 20 kilometres, Medium magnitude between about 20 and 30 kilometres, and Low magnitude beyond approximately 30 kilometres for certain landscape types. This gradation indicates a systematic reduction in assessed impact as distance increases.

The consequence of this approach is that protective tests are applied to inputs that may be understated, particularly at distances where the most sensitive designated landscapes are situated. By moderating magnitude assessments precisely at these critical distances, the resulting conclusions risk failing to accurately represent the true effects that the Scottish Ministers are being asked to consider and consent to. This fundamental uncertainty calls into question the reliability of the assessment's predictions and the robustness of its conclusions.

The applicant's submission relies on visualisation materials prepared in accordance with NatureScot's visualisation guidance. This guidance explicitly recognises that printed visualisations cannot fully replicate the scale experienced by a viewer in the field. As such, while these materials provide a useful representation of the proposed development, they inherently possess technical and perceptual limitations that must be acknowledged in the assessment process.

Moreover, wireline drawings included within the same panoramic projections share these intrinsic limitations. Rather than serving as independent corrective tools, they

are technical renderings embedded within the visualisation framework and thus subject to the same constraints as the accompanying photographic imagery. This means that although wirelines can assist in understanding the structural aspects of the proposal, they do not overcome the fundamental challenges of accurately conveying spatial relationships and scale.

Given these factors, it is important to interpret the visual evidence cautiously, recognising that such materials may not fully capture the experiential qualities of the site from various viewpoints. While they are valuable components of the assessment, reliance solely on these visualisations without supplementary field appraisal or consideration of their limitations may not provide a comprehensive understanding of the visual impact.

The development would introduce aviation and navigation lighting to a sea horizon that is presently unlit, permanently altering the character of the night-time seascape for the stated 35-year operational life. This change is significant because the current absence of such lighting contributes to the natural quality and tranquillity of the nocturnal seascape. Moreover, the operational lifespan does not limit the policy harm: consenting to this development effectively designates this seascape as appropriate for wind farm use, thereby accepting the permanent alteration of its night-time character. This has important implications for the protection of seascape qualities under relevant policy considerations.

The applicant acknowledges that the proposed development would give rise to certain effects which engage the provisions of National Planning Framework 4 (NPF4), specifically Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. However, despite recognising these effects, the applicant has failed to demonstrate that its conclusions regarding the scale of such effects are consistent with the methodology it employed. Crucially, there has been no satisfactory demonstration of compliance with the policies that safeguard nationally important landscapes and seascapes. This omission undermines confidence that the proposal adequately addresses the statutory requirements set out to protect these sensitive environmental assets. Consequently, the proposal does not meet the requirements of the relevant planning policies designed to protect landscape and seascape interests.

1.1.959 Cultural Landscape, Archaeology and Historic Environment

The practical consequence of the applicant’s failure to properly apply the recognised methodology for assessing effects on the setting of historic assets is that the reliability of their conclusions regarding heritage impacts is fundamentally undermined. Although the applicant claims to have followed Historic Environment Scotland’s established approach, which emphasises evaluating how changes to setting affect the contribution that setting makes to an asset’s cultural significance and whether the integrity of that setting is adequately retained, their assessment falls short of these requirements. Notably, the methodology explicitly advises against equating visual change directly with adverse impact, yet the applicant’s report does not adequately demonstrate this critical distinction.

A detailed Methodological Audit, prepared independently in support of community objections and based solely on the applicant's Appendix 14.3, highlights that while the operational assessment identifies relevant heritage attributes, it fails to show how the integrity of setting has been assessed in accordance with the applicant's own accepted methodology. Instead, the assessment largely focuses on describing visual change—considering factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—before concluding that the integrity of setting remains intact. This approach omits the essential evaluative step required by the methodology, as none of the worked examples examined in the Audit demonstrate how the integrity of setting has been critically appraised beyond mere visual description.

In light of this, the applicant's assessment cannot be relied upon to provide a robust or methodologically sound evaluation of heritage impacts. The absence of a transparent and rigorous assessment of setting integrity calls into question the validity of the conclusions drawn and undermines confidence in the planning decision-making process. It is therefore essential that any determination of this application takes into account the methodological deficiencies identified and requires a reassessment that fully complies with the established Historic Environment Scotland methodology.

While the applicant's assessment acknowledges the cultural significance of the affected heritage assets, it primarily focuses on isolated viewpoints rather than the broader experiential qualities integral to their value. The applicant's baseline records identify key attributes such as pilgrimage routes, arrival by sea, movement through a living cultural landscape, and the interconnectedness of monuments with spirituality and the surrounding landscape and seascape. These qualities are inherently dynamic, experienced through movement rather than from fixed positions, yet the assessment falls short in fully capturing this complexity.

Historic Environment Scotland's consultation responses, as documented within the application, underscore this shortfall by requesting additional viewpoints to ensure the wider cultural landscape and experiential dimensions are adequately represented. Without incorporating these broader perspectives, the assessment risks underestimating the heritage impacts, as the significance of the assets arises from their relationship with the landscape and the journey through it, rather than from discrete visual snapshots alone. Therefore, the current approach does not sufficiently address the cultural significance established in the baseline, and further refinement is necessary to appropriately inform decision-making.

The applicant's evidence acknowledges that the heritage conclusions drawn in the proposal are directly reliant on the findings of the landscape assessment. It is specifically noted that where the landscape effects have been understated, as previously demonstrated, this understatement is consequently reflected in and inherited by the heritage impact conclusions. This interdependency undermines the credibility of the heritage assessment, as any failure to accurately appraise landscape effects inevitably leads to an incomplete or misleading evaluation of heritage impacts. Therefore, the deficiencies identified within the landscape assessment cast significant doubt upon the validity of the heritage conclusions presented.

The application engages National Planning Framework 4 (NPF4) Policy 7, specifically subsections (h) concerning scheduled monuments and (c) and (d) relating to the settings of heritage assets, alongside GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. Despite this, the applicant has failed to demonstrate that the cultural significance of both internationally and nationally important heritage assets, as well as their settings, will be adequately protected. Crucially, the Scottish Ministers have not been provided with the comprehensive assessment necessary to substantiate such a conclusion. Without this essential evidence, the proposal falls short of meeting key policy requirements for heritage protection, thereby undermining its acceptability within the planning framework.

1.1.960 Effects on Island Communities, Tourism and the Local Economy

There is significant uncertainty regarding the potential impact of the proposed development on the fundamental qualities that attract visitors to the island communities in question. The applicant's own baseline assessments identify key attributes such as landscape, seascape, cultural heritage, tranquillity, and remoteness as central to the visitor experience. Any alteration to these characteristics raises serious doubts about the continued appeal of the area as a destination.

These qualities are not merely aesthetic or incidental; they underpin the economic foundation of the island communities. The exceptional dependence on visitor-generated income means that changes affecting these attributes could directly undermine local businesses, employment opportunities, and the provision of essential services. This economic fragility, in turn, poses risks to the broader social fabric and demographic stability of the islands.

Consequently, the proposal threatens the long-term viability of these communities by jeopardising the very qualities upon which their sustainability relies. Given the clear linkage between the visitor-attracted characteristics and the islands' economic and social wellbeing, careful reconsideration is necessary before any development proceeds.

The applicant's consultants acknowledge that habitability represents a potentially significant pathway by which the proposal could impact island communities. Despite this, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic evaluation presented in Chapter 18 focuses primarily on regional-scale analysis, with detailed consideration given to port communities but lacking an equivalent place-based assessment of the island communities directly facing the development. Notwithstanding this omission, the assessment concludes that these island communities exhibit low sensitivity to tourism effects.

This approach is fundamentally flawed, as small island economies cannot be accurately represented by regional averages. These economies are concentrated in sectors most vulnerable to alterations in the attributes that attract visitors, and an increasing reliance on visitor numbers exacerbates rather than diminishes their sensitivity to such changes. Consequently, the conclusion of low sensitivity, reached without any place-specific analysis, is unsupported by evidence and rests solely on

an unfounded assumption. This undermines the reliability of the socio-economic assessment and raises serious concerns about the adequacy of measures to understand or mitigate impacts on island communities.

The applicant acknowledges that island communities require particular scrutiny in the planning process. However, the assessment undertaken falls short of the necessary standard to understand the proposal's effects on these communities. This deficiency is significant given the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions must be based on robust socio-economic evidence and apply a precautionary approach where such evidence is insufficient. Furthermore, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 impose a clear statutory duty to assess and give weight to the interests of island communities through meaningful engagement from the outset to the conclusion of the decision-making process.

Despite these explicit requirements, the applicant has failed to demonstrate that the proposal is compatible with the sustainability of island communities, nor has it evidenced that the statutory duties owed to them have been fulfilled. The lack of meaningful engagement and comprehensive assessment undermines the ability to ensure that the development will not adversely affect these communities. Consequently, the proposal does not comply with the necessary planning policies and statutory obligations designed to protect the social and economic wellbeing of island populations.

1.1.961 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, with the surrounding waters providing habitat for seabirds, marine mammals, and basking sharks. This ecological context is of considerable importance, as it supports species and habitats recognised for their conservation value and sensitivity. The presence of these features within and adjacent to the site underscores the environmental significance of the location.

The proposed development would introduce activities associated with construction, operation, and decommissioning on a very large scale, extending over several decades. Such sustained and intensive activity within a sensitive marine environment carries the potential for significant adverse effects on the Priority Marine Features and protected species present. Careful consideration must therefore be given to the potential impacts to ensure that the ecological integrity of this important marine area is maintained.

The applicant's submission of a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan indicates an acknowledgment of potential adverse impacts on the North Colonsay and Western Cliffs Special Protection Area, specifically concerning the guillemot population. Such documents are characteristically prepared when an adverse effect on the integrity of a protected site cannot be definitively ruled out. Importantly, the presence of these submissions within the application signals that the applicant accepts the possibility that the Scottish Ministers may not share their conclusion regarding the absence of adverse effects. This recognition necessitates careful consideration of the proposed

derogation and compensation measures to ensure they adequately address any identified impacts on the protected site.

There remains significant uncertainty as to whether the application meets the necessary statutory tests designed to protect internationally important habitats and species. The evidence submitted, including the applicant's own derogation documents, clearly indicates that the degree of certainty required has not been achieved. Consequently, it has not been demonstrated that these legal requirements can be satisfied, undermining the justification for granting consent.

1.1.962 Cumulative and In-Combination Effects

The applicant's evidence clearly establishes that only a portion of the overall development is currently before the Scottish Ministers for consideration. Specifically, the export cable corridor and the onshore transmission works, which are integral components without which the wind farm cannot function, have been deliberately deferred to subsequent applications. This segmentation means that the cumulative effects of the entire project are never assessed concurrently, with critical elements subjected to separate consenting processes following the primary decision. Such an approach is fundamentally flawed, as it undermines the ability of decision-makers to fully comprehend the full scope and impact of the development at the time of determination.

This procedural fragmentation is inconsistent with established legal principles, as underscored in the Raeshaw Farms judgment, which mandates that a project must be evaluated in its entirety rather than being artificially divided into smaller parts whose individual impacts may appear less significant. By salami-slicing the development into discrete components, the current assessment method effectively circumvents comprehensive scrutiny, potentially obscuring cumulative environmental and planning impacts that would otherwise emerge through an integrated evaluation. Consequently, this approach cannot be considered legally or procedurally sound, and it is imperative that the project be assessed as a whole to ensure compliance with planning law and proper environmental governance.

The cumulative impact assessment relies directly on the findings of the underlying Environmental Impact Assessment, including the landscape, heritage, and socio-economic evaluations. As these foundational assessments have been demonstrated to understate the effects, the cumulative assessment consequently adopts this diminished baseline. This results in an overall underestimation of the combined impacts arising from the proposed development in conjunction with other existing, consented, and foreseeable projects. Therefore, the cumulative effects reported cannot be considered reliable or reflective of the true extent of impact.

The planning application fails to comply with key policy and regulatory requirements concerning project splitting and the assessment of cumulative effects, resulting in an incomplete and potentially misleading evaluation. Specifically, the proposal does not satisfy the provisions set out in GEN 21 and paragraph 4.85 of the National Marine Plan, nor does it adhere to NPF4 Policy 11(e) and the stipulations of the Environmental Impact Assessment Regulations relating to project splitting. The applicant has not adequately demonstrated that the cumulative and in-combination

effects of the development, including any deferred works associated with the project, have been thoroughly identified and assessed. This omission undermines the integrity of the environmental assessment and risks overlooking significant impacts that may arise when the entire scope of the project is considered collectively. Consequently, it is imperative that the decision-making process explicitly addresses how the deferred works will be treated to ensure a comprehensive and compliant evaluation. Without such clarification and assessment, the proposal remains non-compliant with established planning policies and environmental regulations.

1.1.963 Public Engagement, Site Selection and Environmental Information

When comparing the consultation process for this application to the standards set by GEN 18 of the National Marine Plan and the principles of effective public participation enshrined in the Aarhus Convention, it is evident that the affected communities have not been afforded a realistic opportunity to engage meaningfully with decisions of such magnitude. The applicant seeks significant weight to be given to the site-selection process; however, this process's legitimacy is undermined by persistent deficiencies in public participation, which have carried through from the plan and site-selection stages into the current application phase.

The consultation coincided with the busiest months for island communities, a period when residents are occupied with continuous work throughout the visitor season and when access to specialist advice is particularly limited. Meanwhile, the applicant has had years, alongside substantial professional and financial resources, to prepare its extensive technical submission comprising thousands of pages. Under these conditions, the affected communities have been placed at a distinct disadvantage, falling short of the standards expected for effective participation. This disparity should be a crucial consideration for Ministers when evaluating the representations submitted.

There remains significant uncertainty regarding the adequacy of the Environmental Impact Assessment submitted with this application. While it is acknowledged that the assessment is extensive, the key question is whether it is sufficient to inform the Scottish Ministers' decision. The evidence demonstrates that, across several critical topics, the assessment either fails to fully investigate identified pathways to significant effects or relies on methodologies that undermine its conclusions. For example, the landscape assessment presents outcomes based on a distance pattern not supported by its own methodology; the heritage assessment does not substantiate the application of its stated integrity test; and the socio-economic assessment lacks any place-based analysis relevant to the islands affected. This calls into question the robustness and reliability of the environmental information provided.

Furthermore, the application depends in part on future assessments, post-consent plans, ongoing monitoring, and additional approvals to address outstanding issues. However, such reliance does not satisfy the requirements of the EIA Regulations, which mandate that likely significant effects must be fully understood prior to determination. The Scottish Ministers are required to make their decision based on the evidence before them at the time of application, not on assumptions that unresolved matters will be satisfactorily dealt with later. In this context, the applicant

has not demonstrated that the environmental information submitted is adequate to meet this fundamental standard. Consequently, the application should not be approved on the basis of the current EIA evidence.

1.1.964 Effects on Local Area

There is significant uncertainty surrounding the applicant's assessment of the effects on Islay, Colonsay, and Oronsay, which raises concerns about the reliability of the environmental and heritage impact evaluation. Islay and Colonsay, as the closest islands to the proposed development, warrant thorough consideration. The development area lies immediately north-west of Islay and west of Colonsay, yet the application predominantly treats Islay only as a potential direct project location rather than as a distinct island community affected by proximity. Notably, the Atlantic-facing communities of Islay confront the nearest edge of a 448 square kilometre development area, yet no place-based assessment has been conducted to address the effects on their setting, economy, or community life. For Colonsay and Oronsay, the situation is equally pressing. The seaward outlook, integral to daily life, directly faces the array, and the North Colonsay and Western Cliffs Special Protection Area—Colonsay's own coastline—is central to the applicant's derogation case and compensation plan. This represents the clearest acknowledgment within the application that harm to the internationally protected seabird population in these cliffs cannot be ruled out. Additionally, Oronsay Priory, a scheduled monument of national importance located within this community, suffers from the same gaps identified in the heritage assessment, particularly regarding the treatment of its open maritime setting. Taken together, these shortcomings suggest a substantial underassessment of direct and significant effects on these island communities, their economies, and their heritage, undermining confidence in the adequacy of the submitted environmental and heritage impact evaluations.

The applicant's own Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity, directly oriented towards the proposed development, with extensive visibility and a large geographical extent of change. The assessment concludes a moderate and significant overall effect across approximately 21 kilometres, with turbines spanning around 39 degrees of the horizon. Similarly, the West Coast of Iona is recognised as highly sensitive with widespread visibility, and the applicant accepts that significant effects would be experienced by residents and visitors across much of the island, including at Dùn Ì, its highest point.

Iona's monastic landscape, comprising the Abbey, the Nunnery, and the high crosses, is of international heritage importance. The applicant's baseline acknowledges the significance of pilgrimage, arrival by sea, and movement through the landscape. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself; however, no visualisation has been provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, leaving a critical gap in the assessment of visual impacts on this heritage asset.

Community concerns further emphasise the scale of effect, with a household consultation revealing that 92 per cent of respondents on Iona object to the proposal. Notably, habitability—a pathway of potential effect identified by the applicant's own consultants—has never been assessed for this community. To contextualise the

visual scale, the largest turbines would overtop Ben Hynish on Tiree, a familiar landmark standing at 141 metres and visible from Iona at approximately 33 kilometres, by about 194 metres at roughly two-thirds of that distance.

Taken together, these points demonstrate that the applicant's assessment significantly underestimates the scale and significance of visual, community, and heritage impacts on Iona. This undermines the accuracy of the environmental and social impact evaluation and warrants further, more rigorous assessment to fully understand and address the effects on this sensitive and internationally important locale.

The applicant's assessment inadequately addresses the significant impacts on the coastal communities and landscapes of Mull and Ross of Mull, which has practical consequences for both local residents and the tourism economy. The Ross of Mull South coastal area is recognised as having High sensitivity at distances of approximately 22 to 24 kilometres and is attributed only Medium magnitude of effect. Notably, the applicant accepts that significant effects would occur at Erraid and along the Core Paths of the Ross. Furthermore, Fionnphort—the gateway to Iona and primary embarkation point for visitors—is identified as experiencing significant effects. This community is directly dependent on the flow of visitors, and yet no tailored, place-based assessment has been provided to reflect its unique relationship with the development.

Similarly, across Mull, significant effects are accepted by the applicant on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, which encompasses Mull's western waters and islands, is assessed as having High sensitivity throughout at distances between approximately 21 to 33 kilometres. Despite this, the magnitude of effect is limited to Medium, which underplays the true visual and experiential impact on this nationally designated landscape. The applicant's reliance on distance-based reasoning is further exemplified in the treatment of the Wilderness and Gribun Rocks coastal area, where effects are dismissed as small due solely to viewing distances exceeding 30 kilometres. Such an approach fails to adequately consider the cumulative and perceptual significance of the development in these sensitive locations.

Crucially, Mull's west-facing tourism economy—including wildlife boat operations and accommodation providers in its western townships—relies heavily on the intactness of the Atlantic seascape, which the proposed development would industrialise. Despite this dependency, none of these communities has been afforded a thorough, place-based assessment to understand the full extent of economic and social consequences. In sum, the applicant's evaluation does not satisfactorily capture the scale or significance of the effects on the landscapes and communities most intimately tied to these coastal and seascape environments.

The applicant's assessment significantly underestimates the practical consequences of the proposed development on important designated landscapes and the vulnerable island communities that depend upon them. Ulva, situated within the Loch na Keal National Scenic Area, exemplifies this shortcoming. As a community-owned island undergoing a delicate process of regeneration, Ulva's recovery relies heavily

on the preservation of its unspoilt seascape and natural setting—qualities that are directly threatened by the development. Despite this, no specific assessment has been made of the effects on Ulva, leaving a substantial gap in the understanding of how the project may undermine the island's cultural and environmental renewal.

Further concerns arise regarding other significant islands within the same National Scenic Area. Staffa, one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development site—beyond the 30 kilometre limit to which NatureScot recommended assessing effects on National Scenic Area qualities. The applicant concludes that any changes at Staffa would be small and not significant, a judgment that appears inconsistent with their own acceptance of the island's panoramic maritime qualities. Similarly, the Jura National Scenic Area, recognised for its wild and undeveloped Atlantic character, is assessed as having only Medium to Low magnitude effects despite its High sensitivity and proximity of 28 to 32 kilometres. This moderation is attributed to distance and retained landforms, yet it fails to adequately reflect the intrinsic value of Jura's outlook that underpins its designation.

The same approach applies to the Scarba, Lunga and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres away, which is treated with similar caution. Taken together, these assessments reveal a pattern of underestimation that risks compromising the natural and cultural qualities of these wider seaboard landscapes and island communities. The omission of thorough evaluation, particularly for sensitive and recovering communities like Ulva, undermines the protection intended by their designations and raises serious concerns about the adequacy of the applicant's environmental and cultural considerations.

The applicant's assessment significantly understates the magnitude of change and impact on Tiree's sensitive and distinctive landscape character, resulting in an unreliable evaluation of effects. Specifically, the South Tiree coastal area, which lies approximately 35 kilometres from the proposed development, is classified as having High sensitivity. Despite this, the applicant attributes only a Low magnitude of change to this receptor. This is inconsistent with the nature of Tiree's landscape, which is exceptionally low-lying and defined by the dominance of sea and sky. The island's highest point, Ben Hynish, rises merely 141 metres. In this context, turbines reaching up to 335 metres would introduce vertical structures unprecedented in Tiree's seascape, disrupting the open oceanic horizon that is fundamental to its character. Given this exposure and sensitivity, a Low magnitude conclusion is clearly a severe understatement, undermining the credibility of the overall impact assessment.

The applicant's assessment appears to rely heavily on distance-based moderation to mitigate visual and economic effects on surrounding communities. However, this approach does not adequately address the unique circumstances of certain mainland and island locations with direct views of the development. For instance, Gigha, a community-owned island celebrated as a national symbol of island regeneration, faces the development waters directly to the east, yet the applicant has failed to examine the potential impacts on its delicate social and economic fabric.

Similarly, Ardnamurchan Point—the westernmost tip of the British mainland—offers expansive panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the receptors for which the applicant's distance-based mitigation claims are applied, yet the assessment does not sufficiently consider how the development might alter this important visual amenity and its associated visitor economy.

Furthermore, the chain of communities along the west coast of Kintyre, whose identity and tourism rely heavily on the open Atlantic seaboard views towards Islay, Jura, and beyond, are equally disregarded. The Treshnish Isles and other small islands with similar outlooks also share this vulnerability. In sum, the applicant's assessment lacks a comprehensive evaluation of these sensitive receptors, thereby undermining confidence in its conclusions and the effectiveness of proposed mitigation measures.

The applicant's environmental impact assessment systematically applies a distance-based approach that results in the moderation and discounting of significant effects on highly sensitive receptors located beyond approximately 20 kilometres. This methodology effectively diminishes the recognised magnitude of change experienced by these receptors, thereby understating the true extent of impact. Such an approach fails to account adequately for the lived experience of communities in these areas, whose exposure to effects is neither fully acknowledged nor assessed on a place-specific basis.

Taken together, the evidence demonstrates that beyond the 20-kilometre threshold, the applicant's assessment consistently reduces the perceived severity of effects, creating a pattern of neglect towards the cumulative and contextual impacts on distant but sensitive locations. This systematic moderation undermines the integrity and completeness of the environmental impact assessment, as it does not provide a thorough evaluation of all potentially affected receptors. Without place-based assessments tailored to the circumstances of each community, the assessment falls short of its duty to comprehensively understand and mitigate environmental harm.

In conclusion, the reliance on a rigid distance criterion to discount effects beyond 20 kilometres compromises the robustness and fairness of the environmental impact assessment. To uphold the standards expected in planning and environmental evaluation, it is essential that significant effects on sensitive receptors, regardless of their distance, receive full and explicit consideration. Only through such rigorous and inclusive assessment can the decision-making process ensure that all affected communities are justly represented and environmental harms appropriately addressed.

1.1.965 Personal Observations

In addition to the planning matters above, I am personally concerned because: I'm a small business owner who regularly brings groups of people to Iona for pilgrimage. This would be a horrible impact on the island community and wildlife.

Finally, I would also ask the Scottish Ministers to consider: The turbines do not belong alongside one of the worlds most sacred isles!!

1.1.966 Summary

The proposal for the MachairWind Offshore Wind Farm fails to demonstrate compliance with the relevant statutory and policy framework governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the local communities and heritage of the coastal area. Moreover, independent scrutiny of the submitted documentation reveals that the magnitude of these impacts has been underestimated. Crucially, the necessary heritage assessment has not been conducted, and while effects on the island communities were identified, they have never undergone a comprehensive appraisal. Additionally, the ecological criteria required to support the proposal have not been satisfactorily demonstrated as achievable. It is also notable that only a portion of the entire project is currently before the Scottish Ministers for consideration.

In light of these deficiencies, it is respectfully urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm and decline the associated marine licence. Should the Ministers contemplate approval, it is requested that they first mandate the submission of further environmental information and enhanced visual representations. Furthermore, determination of the applications should be deferred until after a public inquiry, allowing for thorough examination of the concerns raised in this objection. Irrespective of the ultimate decision, it is also requested that Ministers explicitly address and conclude on the proposal's effects on cultural heritage and the island communities within their stated reasons.

Yours faithfully,

[Redacted]

This objection has been submitted via ObjectNow on behalf of [Redacted] and has been verified as their own personal representation. In accordance with data protection requirements, we respectfully request that their personal details — including postal address and email address — are redacted before publication.