Member of the public 601
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.

1.1.1 Legislative and Policy Framework

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

The evidence confirms that the application does not adequately address these requirements. There is a lack of clear demonstration that the applicant has properly considered the preservation of natural beauty or the conservation of important ecological and geological features. Similarly, the protection of heritage assets, including buildings and archaeological sites, has not been sufficiently evidenced. The application also fails to show that reasonable mitigation measures have been identified or proposed to address potential adverse effects on these protected interests.

Given these deficiencies and omissions, the application conflicts with the applicable legal and policy framework established by Schedule 9 of the Electricity Act 1989.

Where such compliance has not been demonstrated, the statutory framework dictates that these matters weigh against the granting of consent.

In conclusion, the application does not meet the statutory duties under Schedule 9 of the Electricity Act 1989, and this failure constitutes a substantive reason to refuse consent.

The marine licence application under Part 4 of the Marine (Scotland) Act 2010 must be determined in strict accordance with Scotland's National Marine Plan, including its General Policies such as GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts). The application fails to demonstrate compliance with these statutory requirements and relevant policies, which are integral to the assessment process.

The evidence shows clear deficiencies and omissions in the application's submission, including a lack of sound evidence as required by GEN 19 and inadequate consideration of cumulative impacts under GEN 21. Furthermore, the application does not sufficiently address the protection of the historic environment or natural heritage, contravening GEN 6, GEN 7, and GEN 9. The absence of robust engagement as mandated by GEN 18 further undermines the application's conformity with the National Marine Plan.

Given these unresolved conflicts with the applicable legal and policy framework, the application cannot be considered compliant. As established, where compliance has not been demonstrated, these shortcomings weigh decisively against the granting of consent. Therefore, the marine licence application should be refused on the grounds of non-compliance with the Marine (Scotland) Act 2010 and the 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. 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 applicant's submission fails to provide an adequate Environmental Impact Assessment (EIA) as mandated by The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations. These regulations explicitly require that the likely significant environmental effects of the proposal be identified, thoroughly assessed, and transparently reported prior to any determination. The absence of a comprehensive and compliant EIA undermines the decision-making process by leaving critical environmental impacts insufficiently examined and documented. This deficiency is not a minor procedural oversight but a fundamental failure to meet statutory requirements designed to safeguard environmental interests.

Furthermore, the proposal does not satisfy the obligations under the Habitats Regulations, which demand a rigorous assessment of the effects on European protected sites in accordance with the applicable statutory tests. The evidence before the determining authority does not demonstrate compliance with these tests, nor does it adequately address potential adverse impacts on designated habitats. This omission represents a clear conflict with the legal framework governing the protection of biodiversity and designated conservation sites. Without a proper Habitats Regulations Assessment (HRA), the proposal cannot be considered lawful or consistent with established environmental protection policies.

Given these significant shortcomings—the incomplete EIA and the failure to conduct a compliant HRA—the proposal is in direct conflict with the statutory and policy requirements set out to ensure environmental protection. Where compliance has not been demonstrated, and where evidence reveals deficiencies and omissions, these matters must weigh decisively against the granting of consent. The application, as it stands, does not meet the necessary legal standards and should therefore be refused on these grounds.

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

It is the applicant's responsibility to prove that every applicable legal and policy framework has been satisfied. However, the submitted evidence does not establish such compliance. Instead, it reveals omissions and conflicts with the statutory and policy requirements that govern the proposal. Where compliance is not demonstrated, these shortcomings must be given significant weight against the granting of consent.

In this case, the absence of adequate evidence confirming adherence to the full range of legal and policy obligations means the proposal does not meet the necessary standards for lawful and policy-compliant development. Consequently, the application should be refused on the basis that the applicant has not fulfilled the essential evidential requirements to justify approval.

1.1.2 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to comply with the impact criteria set out in 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 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.

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.

1.1.3 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.

The visualisation materials submitted in support of the application do not fully convey the true scale and impact of the proposed development as it would be experienced on site. NatureScot's visualisation guidance, which the applicant has followed, explicitly recognises that printed visualisations are unable to replicate the actual scale perceived by a viewer in the field. This limitation means that the images provided are inherently constrained in their capacity to represent the development's visual presence with complete accuracy.

Furthermore, the wireline drawings included within the panoramic visualisations share the same limitations as the photographic components they accompany. Rather than serving as an independent means to correct or enhance the photographic

images, these wirelines are a technical rendering embedded within the visualisation package. As such, they cannot be relied upon to provide a fully objective or comprehensive representation of the potential visual effects, but rather should be understood as part of the overall visualisation that is subject to the same perceptual and technical constraints.

Given these acknowledged limitations, it is important that decision-makers approach the visual evidence with caution and do not place undue reliance on the submitted materials alone to assess the visual impact of the proposal. Supplementary on-site assessments and a thorough understanding of the guidance's caveats are essential to form a balanced and informed judgement on the visual effects of the development.

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, 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.

1.1.4 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.

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 rely significantly on the findings of the landscape assessment. This interdependence is critical because any inaccuracies or shortcomings within the landscape assessment will directly influence the validity of the heritage impact appraisal. It is therefore essential that the landscape effects are thoroughly and accurately evaluated to ensure a reliable overall assessment.

However, it has been identified that the landscape assessment understates the extent of the landscape effects, as outlined previously. This understatement has the effect of diminishing the perceived impact on the heritage assets. Since the heritage

conclusions are derived from the landscape assessment, they consequently adopt this understated perspective, potentially leading to an incomplete or overly optimistic evaluation of the heritage impacts.

Given this reliance and the identified deficiencies in the landscape assessment, the credibility of the heritage impact conclusions is undermined. A more robust and transparent approach is required to ensure that heritage effects are fully understood and appropriately weighted within the planning decision-making process. Without this, there remains a risk that the true scale of harm to heritage assets is not properly acknowledged or mitigated.

The application fails to demonstrate adequate mitigation measures to protect 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.

1.1.5 Effects on Island Communities, Tourism and the Local Economy

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

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

The applicant's 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.

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.

1.1.6 Ecology, Biodiversity and Habitats Regulations

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

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

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

The applicant's submission includes a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan, specifically 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.

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 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.

1.1.7 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.

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.

1.1.8 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 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.

1.1.9 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 identifies the Sound of Iona as an area of high sensitivity, directly oriented towards the proposed development, with

extensive visibility and a large geographical extent of change. The assessment concludes a moderate and significant overall effect across approximately 21 kilometres, with turbines spanning around 39 degrees of the horizon. Similarly, the West Coast of Iona is recognised as highly sensitive with widespread visibility, and the applicant accepts that significant effects would be experienced by residents and visitors across much of the island, including at Dùn Ì, its highest point.

Iona's monastic landscape, comprising the Abbey, the Nunnery, and the high crosses, is of international heritage importance. The applicant's baseline acknowledges the significance of pilgrimage, arrival by sea, and movement through the landscape. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself; however, no visualisation has been provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, leaving a critical gap in the assessment of visual impacts on this heritage asset.

Community concerns further emphasise the scale of effect, with a household consultation revealing that 92 per cent of respondents on Iona object to the proposal. Notably, habitability—a pathway of potential effect identified by the applicant's own consultants—has never been assessed for this community. To contextualise the visual scale, the largest turbines would overtop Ben Hynish on Tiree, a familiar landmark standing at 141 metres and visible from Iona at approximately 33 kilometres, by about 194 metres at roughly two-thirds of that distance.

Taken together, these points demonstrate that the applicant's assessment significantly underestimates the scale and significance of visual, community, and heritage impacts on Iona. This undermines the accuracy of the environmental and social impact evaluation and warrants further, more rigorous assessment to fully understand and address the effects on this sensitive and internationally important locale.

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

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

The assessment's reliance on distance-based reasoning, particularly in the treatment of the Wilderness and Gribun Rocks coastal area where viewing distances exceed

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

The applicant's assessment fails to 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 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 the significant effects on several mainland and island communities that maintain direct visual and economic connections with the seascape surrounding the proposed development. Notably, Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by residents, faces the waters of the development site from the east. Despite the island's finely balanced community and economy, no examination of potential impacts on Gigha has been undertaken, leaving a critical gap in the appraisal of social and economic consequences. Similarly, Ardnamurchan Point, the westernmost point of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors along the entire peninsula. These seaward panoramas represent precisely the receptors to which the applicant's distance-based moderation is applied, thereby diminishing the perceived significance of potential visual impacts.

Further deficiencies in the assessment arise concerning the west coast of Kintyre, where a chain of communities derives its outlook, character, and visitor economy from the open Atlantic seaboard facing Islay, Jura, and the wider waters beyond. This area, together with the Treshnish Isles and adjacent small islands and mainland coasts with views toward the development area, shares an equivalent position of sensitivity. The omission of any detailed evaluation of the effects on these receptors compromises the comprehensiveness and reliability of the applicant's assessment. In light of this, the overall appraisal cannot be regarded as sufficiently robust, as it neglects the potential for significant adverse effects upon these interconnected communities and their seascape-dependent economies.

The 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.

1.1.10 Personal Observations

In addition to the planning matters above, I am personally concerned because: I bring tourists to the islands every summer. This development will significantly and negatively affect experiences that visitors have in this most beautiful area.

Based on my own local knowledge, I also wish to highlight that: I believe the local voices who are speaking out against this project have the best insight into the effects of this project to the area, and they should be given fair consideration.

1.1.11 Summary

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

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

Yours faithfully,

[Redacted]

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

Member of the public 602
Dear Sir/Madam,

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

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

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

1.1.12 Seascape, Landscape and Visual Effects

The visualisation materials submitted in support of the application are subject to inherent technical and perceptual limitations that must be carefully considered in their assessment. According to NatureScot’s visualisation guidance, which the applicant has adopted, printed visualisations are unable to fully replicate the scale and spatial experience that a viewer would perceive in the field. This fundamental shortcoming means that the visual evidence may underrepresent or distort the true visual impact of the proposed development when viewed in situ. Consequently, reliance on these materials alone may lead to an incomplete or misleading understanding of the development’s effect on the landscape.

Furthermore, the wireline drawings included within the panoramic projections are constrained by the same limitations as the accompanying photography. These wirelines serve as technical renderings embedded within the visualisation and are not independent tools that can correct or compensate for photographic distortion or scale misrepresentation. As such, they do not provide a separate or more accurate measure of visual impact but rather replicate the visual constraints inherent in the photographic base. This reliance on visualisation techniques with acknowledged deficiencies necessitates caution in their interpretation and underscores the need for supplementary methods or on-site assessments to accurately gauge the development’s visual implications.

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.

1.1.13 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 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 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.

1.1.14 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 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 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.

1.1.15 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.

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 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.

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.

1.1.16 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 the current cumulative impact assessment is that it significantly underestimates the true combined effects of the proposed development alongside existing, consented, and foreseeable projects. This stems directly from the reliance on baseline assessments within the Environmental Impact Assessment that have themselves understated landscape, heritage, and socio-

economic effects. As a result, the starting point for the cumulative assessment is flawed, leading to an overall diminished understanding of the proposal's broader implications.

Analytically, because the cumulative assessment depends entirely on these baseline conclusions, any inaccuracies or omissions in the initial evaluations inevitably carry through into the combined effects appraisal. Consequently, the assessment fails to capture the full scale and severity of cumulative impacts, reducing its reliability as a tool for informed decision-making. Without addressing these foundational understatements, the cumulative assessment cannot be regarded as a robust or comprehensive reflection of the development's true potential consequences.

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.

1.1.17 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 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.

1.1.18 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 own Coastal Character assessment acknowledges the Sound of Iona as an area of high sensitivity, with a direct orientation towards the proposed development. It identifies extensive visibility across a large geographical extent, approximately 21 kilometres, with turbines spanning about 39 degrees of the horizon. The assessment recognises moderate and significant overall effects, including impacts on the ferry crossing between Fionnphort and Iona. Similarly, the West Coast of Iona is described as highly sensitive with widespread visibility, and the applicant concedes significant effects for residents and visitors throughout much of the island, including at its highest point, Dùn Ì. These findings underscore the

extensive visual intrusion that the development would impose upon Iona's landscape.

Beyond visual impacts, the applicant's baseline acknowledges the international importance of Iona's monastic heritage, including the Abbey, the Nunnery, and the high crosses, which derive significance from pilgrimage, arrival by sea, and movement through the landscape. Historic Environment Scotland requested additional viewpoints, such as from the ferry crossing itself; however, the applicant failed to provide visualisations from critical vantage points like the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn. Moreover, a household consultation revealed that 92 per cent of Iona residents object to the proposal, yet the applicant did not assess habitability, despite its identification as a potential pathway of effect on the community. The perceived scale of the turbines can also be demonstrated by comparison with the familiar landmark of Ben Hynish on Tiree—141 metres high and visible from Iona at 33 kilometres—while the largest turbines would overtop Ben Hynish by approximately 194 metres at a closer distance of roughly two-thirds of that span. Taken together, these factors indicate that the applicant's assessment substantially underestimates the scale and significance of visual, community, and heritage impacts on Iona, thereby compromising the accuracy of the environmental and social impact evaluation.

The applicant's assessment 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 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.

While the applicant's assessment attributes a Low magnitude of change to the South Tiree coastal area despite its High sensitivity at approximately 35 kilometres, this conclusion merits closer scrutiny. Tiree’s landscape is uniquely defined by its exceptionally low-lying topography, with the highest elevation at Ben Hynish reaching only 141 metres. This flat, open oceanic horizon is a defining characteristic, making the introduction of turbines up to 335 metres in height unprecedented and markedly intrusive. The significant vertical scale of these structures contrasts sharply with the island’s natural features, suggesting that the assessment substantially understates the true magnitude of change. Consequently, the evaluation of effects on Tiree’s sensitive and distinctive landscape character appears unreliable, warranting a more rigorous and proportionate appraisal of visual and environmental impact.

While the applicant's assessment applies distance-based moderation to mitigate perceived effects on seascape receptors, this approach appears insufficient when considering communities with direct views and economic reliance on the seascape. For instance, Gigha, a community-owned island renowned nationally for its

successful regeneration, faces the proposed development from the east. Despite its finely balanced community and economy, no specific examination of the potential impacts on Gigha has been undertaken, leaving a notable gap in the assessment's comprehensiveness.

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

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

There remains considerable uncertainty 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.

1.1.19 Personal Observations

In addition to the planning matters above, I am personally concerned because: I live in Ayrshire so no direct affect ne at home. However, I love to visit west coast and am fearful of how such a monstrosity would impact the lives of the west coast islands and the people who live there.

Finally, I would also ask the Scottish Ministers to consider: The beauty of Scotland.

1.1.20 Summary

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

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

Yours faithfully,

[Redacted]

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

Member of the public 603
Dear Sir/Madam,

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

I request that this correspondence be recorded as a formal objection, that my details be registered accordingly, and that I receive notification of the final determination concerning these applications.

The following considerations outline the planning and environmental grounds underpinning this objection, assessed within the relevant statutory and policy context governing these applications. It is essential to note that the onus lies wholly with the applicant to provide robust and sufficient evidence demonstrating compliance with the applicable statutory tests and policy requirements. Objectors are not obligated to substantiate the contrary position. Based on the analysis presented herein, it is clear that the applicant has failed to meet this evidential burden, and as such, the applications ought to be refused consent.

1.1.21 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 must be refused because it fails to comply with the statutory requirements set out in Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland's National Marine Plan. Authorisation decisions under this legislation are legally required to be taken in accordance with the National Marine Plan unless other 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 collectively form an integral part of the statutory assessment framework for the application.

The evidence submitted with the application is deficient and incomplete in demonstrating adherence to these policies. There are clear omissions and unresolved conflicts with the applicable legal and policy framework, particularly in relation to the protection of the historic environment, natural heritage, and landscape character. The application fails to provide sound evidence as required by GEN 19, undermining the statutory assessment process. Furthermore, the absence of adequate engagement as mandated by GEN 18, and the lack of proper consideration of cumulative impacts under GEN 21, further compound the failure to meet the statutory criteria. These shortcomings are not minor procedural errors but fundamental defects that weigh decisively against the granting of consent.

Given these significant deficiencies and the failure to demonstrate compliance with the National Marine Plan policies, the application cannot lawfully be approved. The statutory framework is clear that where compliance is not demonstrated, or where evidence identifies conflicts or omissions, these matters must be given substantial weight against authorisation. Therefore, the marine licence application should be refused to uphold the legal and policy standards established by the Marine (Scotland) Act 2010 and the National Marine Plan.

The proposal under consideration fails to demonstrate compliance with the key policies of National Planning Framework 4 (NPF4), specifically Policies 3, 4, 7, and 11, which 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 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 proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018, resulting in a fundamental procedural deficiency. This statutory requirement explicitly demands that the interests of island communities be identified, assessed, and given due weight in the decision-making process. The absence of clear evidence demonstrating compliance with this obligation means that the proposal does not meet the legal standards set by the Act. Consequently, the decision-making process is flawed, undermining the statutory protections intended to safeguard island communities' unique social, economic, and environmental circumstances.

Furthermore, the failure to demonstrate compliance with the Islands (Scotland) Act 2018, coupled with the presence of omissions and deficiencies in addressing island community interests, constitutes a direct conflict with the applicable legal and policy framework. As established, where such deficiencies or omissions exist, they must weigh against the granting of consent. The proposal's inability to adequately engage with or reflect the statutory requirements for island communities therefore represents a significant material consideration that should lead to refusal. This failure not only contravenes the statutory duty but also compromises the integrity of the planning process in relation to island community interests.

The applicant has failed to dispel fundamental uncertainty regarding compliance with the full spectrum of relevant legal and policy requirements. It is a well-established principle that the onus lies squarely on the applicant to provide robust, objective, and proportionate evidence demonstrating that every applicable statutory duty, planning policy, and environmental assessment obligation has been met. In this case, the evidence submitted does not meet this evidential burden. The absence of comprehensive and conclusive proof leaves critical questions unresolved about whether the proposal aligns with the necessary legal and policy frameworks. This lack of clarity undermines confidence in the application's conformity with statutory and policy mandates.

Moreover, the evidence presented reveals clear deficiencies and omissions that directly conflict with the applicable legal and policy framework. Where such conflicts or gaps exist, established planning principles dictate that these matters must weigh decisively against the granting of consent. The applicant's failure to demonstrate compliance in these respects is not a mere procedural oversight but a substantive shortcoming that precludes lawful approval. Given the unresolved uncertainties and demonstrable evidential failings, the proposal cannot be considered compliant with the statutory and policy requirements that govern the planning process. Consequently, the application should be refused on the basis that the applicant has not fulfilled the necessary responsibility to prove compliance.

1.1.22 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.

In considering the proposal, it is important first to assess the mitigation measures in relation to the relevant policies within the National Planning Framework 4 (NPF4) that are designed to protect nationally important assets. Policy 11 must be read in conjunction with Policies 4(c) and 4(d), which safeguard National Scenic Areas and nationally important landscapes from significant adverse effects on the qualities for which they have been designated. Additionally, Policy 7, particularly Policy 7(h) concerning scheduled monuments and Policies 7(c) and 7(d) on the setting of historic assets, alongside Policy 3 relating to biodiversity, collectively establish a robust framework to ensure the preservation of designated assets.

Upon detailed examination, the proposal fails to satisfy these interconnected policies. It would result in significant adverse effects on nationally designated landscapes and seascapes, contravening the protections envisaged under Policies 4(c) and 4(d). Furthermore, the evidence submitted does not demonstrate that the cultural significance of scheduled monuments and their settings would be adequately safeguarded, thus conflicting with the requirements of Policy 7. The protection of island communities, an important consideration within these policies, has also not been assured. Finally, the ecological assessments provided fail to meet the necessary tests stipulated under Policy 3, leaving uncertainty as to whether biodiversity interests can be effectively protected.

In conclusion, the proposal does not comply with multiple relevant NPF4 policies intended to protect designated landscapes, heritage assets, and biodiversity, resulting in significant adverse impacts that cannot be satisfactorily mitigated on the basis of the current evidence.

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.

1.1.23 Seascape, Landscape and Visual Effects

The applicant’s assessment methodology fails to specify a distance threshold beyond which major effects cease, yet analysis of their own Chapter 16 and Appendices 16.1 to 16.3 reveals a consistent pattern: no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of receptor sensitivity or visibility extent.

Furthermore, the applicant's documents acknowledge distance's influence by judging the scale of change as small at viewing distances exceeding 30 kilometres, with Landscape Character synthesis indicating High magnitude effects within about 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types.

This systematic moderation of magnitude at distances corresponding to the location of the most sensitive designated landscapes results in understated inputs to the protective tests applied. Consequently, the conclusions reached by the applicant do not reliably represent the true effects for which Scottish Ministers are asked to grant consent, undermining the robustness and transparency of the assessment's findings.

The practical consequence of relying on the visualisation materials submitted in support of the assessment is that they may not accurately convey the true scale of the development as experienced on site. NatureScot's visualisation guidance, which the applicant follows, explicitly recognises that printed visualisations cannot fully replicate the scale perceived by a viewer in the field. This inherent limitation means that any conclusions drawn solely from these materials should be treated with caution, as they risk understating or misrepresenting the visual impact.

Moreover, the wireline drawings included within the same panoramic projections do not overcome these deficiencies. Rather than serving as an independent means to correct or clarify the photographic visualisations, they are technical renderings subject to the same constraints. As such, they should be understood as part of the overall visualisation package, sharing its limitations, rather than as a definitive or corrective representation of the development's visual effects. This understanding is important for a balanced appraisal of the visual evidence presented.

The applicant's evidence acknowledges that the proposed development 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 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.

1.1.24 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of heritage impacts relies on Historic Environment Scotland's recognised methodology for evaluating effects on the setting of historic assets, which necessitates determining whether changes to setting affect its contribution to cultural significance and whether the integrity of that setting is adequately retained. This methodology explicitly states that visual change alone should not be equated directly with adverse impact. However, a Methodological Audit prepared in support of community objections, utilising only 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 properly evaluated in accordance with the applicant's own accepted methodology.

Specifically, the assessment focuses on describing visual change through factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, before concluding that the integrity of setting is adequately retained. The critical evaluative step required by the methodology—explicitly linking these observations to an assessment of setting integrity—is absent from the examples examined in the Audit. This omission undermines the reliability of the applicant's conclusions regarding heritage impacts and raises concerns over the robustness of the assessment overall.

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.

When comparing mitigation measures, it is important to recognise that the robustness of heritage impact conclusions is closely tied to the accuracy of the underlying landscape assessment. The effectiveness of proposed mitigation

depends fundamentally on a clear understanding of the landscape effects, which in turn inform the heritage evaluation. If landscape effects are not fully accounted for, mitigation strategies may be insufficient or misdirected, thereby compromising their intended outcomes.

The assessment evidence demonstrates that the heritage conclusions are derived from the landscape assessment. As such, any understatement of landscape effects directly affects the credibility of the heritage impact findings. Specifically, where landscape effects have been downplayed or inadequately considered, the heritage conclusions constructed upon these findings inevitably inherit the same degree of understatement. This linkage creates a chain of uncertainty that weakens confidence in the overall evaluation process.

Consequently, reliance on a landscape assessment that understates effects undermines the foundation upon which heritage impact conclusions rest. For a comprehensive and reliable appraisal, it is imperative that the landscape assessment accurately reflects the true extent of effects. Without this, the heritage conclusions cannot be regarded as fully credible, and the justification for mitigation measures remains questionable.

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

1.1.25 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 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.

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.

1.1.26 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 applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are characteristically prepared in circumstances where an adverse effect on the integrity of the protected site cannot be definitively excluded. The inclusion of these submissions is a notable aspect of the application, as it acknowledges the potential for significant impacts on protected habitats. Importantly, the applicant's approach indicates that Scottish Ministers may ultimately reach a different conclusion regarding the presence or extent of any adverse effects. These documents are therefore intended to address and mitigate potential impacts under derogation provisions, demonstrating the applicant's recognition of ecological sensitivities and the need for compensatory measures.

The legal framework governing developments affecting protected habitats and species is unequivocal in its stringent requirements. Under the Habitats Regulations, consent for such proposals may only be granted if the competent authority has ascertained that the integrity of the protected site will not be adversely affected. This determination must be made with no reasonable scientific doubt, and the burden of proof lies firmly with the applicant. Importantly, the mere existence of mitigation measures, compensation proposals, or plans for future monitoring does not satisfy the statutory tests required for lawful consent.

This rigorous standard is further reinforced by the application of GEN 9 and GEN 13 of the National Marine Plan alongside Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). Together, these provisions underscore the necessity of robust, unequivocal evidence demonstrating no adverse effect on site integrity before consent may be lawfully granted. It follows that any development proposal must meet this high evidential threshold at the point of determination, ensuring that environmental protection remains paramount in the planning process.

The 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.

1.1.27 Cumulative and In-Combination Effects

The current assessment process for the proposed development is fundamentally flawed because it fails to consider the project in its entirety. By excluding the export cable corridor and onshore transmission works—both essential for the wind farm's operation—from the application before the Scottish Ministers, the process fragments the project into separate parts. This fragmentation results in the effects of the entire development never being assessed collectively.

This piecemeal approach undermines the integrity of the environmental and planning evaluation. Key components that are critical to the project's functioning are deferred to future applications, meaning that important impacts will be considered only after the principal decision has been made. Such an approach prevents a holistic understanding of the project's cumulative effects, which is necessary to inform sound decision-making.

Moreover, this method conflicts with established legal principles. The courts, notably in the case of Raeshaw Farms, have affirmed that a project must be assessed as a whole rather than being "salami-sliced" into smaller parts whose individual effects may appear less significant. Therefore, the current approach is not only procedurally deficient but also legally unsound, and it should be reconsidered to ensure a comprehensive and lawful assessment of the entire development.

The practical consequence of relying on the current cumulative impact assessment is that it significantly underestimates the true combined effects of the proposed development alongside existing, consented, and foreseeable projects. This underestimation arises because the assessment is founded on baseline conclusions that themselves understate the impacts on landscape, heritage, and socio-economic

factors. Consequently, decision-makers may be misled about the scale and severity of the cumulative impacts when considering the overall acceptability of the proposal.

This issue stems directly from the methodology employed in the Environmental Impact Assessment, where the baseline assessments for key receptors are flawed. As these initial evaluations set the foundation for the cumulative impact assessment, any understatement at this stage propagates through subsequent analyses. The result is a diminished perception of the combined effects, which fails to capture the full extent of the potential harm when the proposal is considered in context with other developments in the area.

Given these concerns, it is essential that the cumulative effects are reassessed using more accurate and robust baseline data to ensure a reliable understanding of the overall impact. Until such improvements are made, the current assessment cannot be regarded as a sound basis for planning decisions, and the cumulative impacts of the proposal remain inadequately addressed.

The applicant's submission 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.

1.1.28 Public Engagement, Site Selection and Environmental Information

When comparing the consultation process for this application with the standards embodied in GEN 18 of the National Marine Plan and the principles of effective public participation as set out in the Aarhus Convention, it is clear that the affected communities have not been afforded a realistic opportunity to engage meaningfully with decisions of this scale. While the applicant has had years to prepare their case, supported by substantial professional and financial resources, the public has faced

significant constraints. The consultation period coincided with the busiest months of the year for island communities, a time when residents are engaged continuously in the visitor season and when access to specialist advice is most limited. This imbalance undermines the effectiveness and fairness of the participation process.

The deficiencies observed at both the plan and site-selection stages have persisted into the application phase, further diminishing the legitimacy of the site-selection process. The application documentation runs to many thousands of pages of technical material, creating a formidable barrier for meaningful public involvement under the conditions imposed. Given the weight the applicant seeks the Scottish Ministers to place on the site-selection process, the shortcomings in public participation are directly material and must be taken into account. It is imperative that Ministers bear these factors firmly in mind when considering the representations made, as the integrity of the decision-making process depends on adherence to established standards of consultation and public engagement.

The Environmental Impact Assessment 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.

1.1.29 Effects on Local Area

While the applicant proposes mitigation and compensation measures aimed at protected species and heritage assets, these do not adequately address the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Islay and Colonsay, being the closest islands to the development area—which lies immediately north-west of Islay and west of Colonsay—are insufficiently assessed in the application. The assessment treats Islay primarily as a potential project location rather than recognising it as an affected island community in its own right. Notably, the Atlantic-facing communities of Islay

face the nearest edge of the 448 square kilometre development area, yet no place-based evaluation has been undertaken to consider the impacts on their setting, economy, or community life.

Furthermore, for Colonsay and Oronsay, the development directly confronts the seaward outlook that is integral to daily life. The North Colonsay and Western Cliffs Special Protection Area, forming part of Colonsay's coastline, is central to the applicant's derogation case and compensation strategy. This represents the clearest acknowledgement within the application that harm to the internationally protected seabird populations inhabiting these cliffs cannot be ruled out. In addition, Oronsay Priory, a scheduled monument of national importance located within this community, suffers from the same shortcomings identified elsewhere in the heritage assessment, particularly regarding the treatment of its open maritime setting.

Taken together, these deficiencies demonstrate that the applicant's environmental and heritage impact evaluation lacks the necessary reliability and thoroughness, leaving the effects on these island communities and their valued assets underassessed and insufficiently mitigated.

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

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

The applicant's assessment of impacts on designated landscapes beyond the immediate development area appears to underestimate the significance of effects when compared to established mitigation thresholds. For instance, although NatureScot requested assessment of effects on National Scenic Area (NSA) qualities up to approximately 30 kilometres, the applicant considers the effect on Staffa—one of Europe's most celebrated small islands located about 35 kilometres away—as small and not significant, despite acknowledging its panoramic maritime qualities. Similarly, the Jura NSA, designated for its wild and undeveloped Atlantic character, is assessed at around 28 to 32 kilometres with a High sensitivity rating but assigned only a Medium to Low magnitude of effect, justified by distance and retained landforms. This approach also extends to the Scarba, Lunga and the Garvellachs NSA, situated roughly 35 to 40 kilometres from the site, where comparable moderate effects are assumed.

Moreover, the assessment fails to consider Ulva, an island within the Loch na Keal NSA that shares the full effects on that designated landscape. Ulva is a community-owned island at the early stages of regeneration, dependent on the unspoilt seascape qualities that are at risk. The absence of any dedicated assessment of

Ulva's recovery prospects and its reliance on the setting's natural and cultural attributes represents a significant omission.

Taken together, these points indicate that the applicant's evaluation does not fully capture the extent or the importance of potential impacts on wider seaboard designated landscapes and vulnerable island communities. This shortfall undermines the robust protection of their natural and cultural qualities that the designations seek to ensure.

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

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

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

The applicant's assessment fails to consider the significant effects on several mainland and island communities that maintain direct visual and economic connections with the seascape surrounding the proposed development. Notably, Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by residents, faces the waters of the development site from the east. Despite the island's finely balanced community and economy, no examination of potential impacts on Gigha has been undertaken, leaving a critical gap in the appraisal of social and economic consequences. Similarly, Ardnamurchan Point, the westernmost point of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors along the entire peninsula. These seaward panoramas represent precisely the receptors to which the applicant's distance-based moderation is applied, thereby diminishing the perceived significance of potential visual impacts.

Further deficiencies in the assessment arise concerning the west coast of Kintyre, where a chain of communities derives its outlook, character, and visitor economy

from the open Atlantic seaboard facing Islay, Jura, and the wider waters beyond. This area, together with the Treshnish Isles and adjacent small islands and mainland coasts with views toward the development area, shares an equivalent position of sensitivity. The omission of any detailed evaluation of the effects on these receptors compromises the comprehensiveness and reliability of the applicant's assessment. In light of this, the overall appraisal cannot be regarded as sufficiently robust, as it neglects the potential for significant adverse effects upon these interconnected communities and their seascape-dependent economies.

The applicant's assessment consistently moderates and discounts the magnitude of change for highly sensitive receptors located beyond approximately 20 kilometres. This systematic approach results in a failure to provide any place-based assessment for the communities living with those effects. Such an omission significantly undermines the integrity of the environmental impact assessment by underestimating the true extent and significance of impacts on these distant yet sensitive receptors. In conclusion, the applicant's distance-based methodology is demonstrably inadequate in capturing and addressing the full range of environmental effects beyond the 20-kilometre threshold.

1.1.30 Personal Observations

In addition to the planning matters above, I am personally concerned because: I have visited Iona and Mull and other close by islands and mainland from over the last seventy years and its cultures, religious, historic and fauna and flora are all outstanding especially the Bay at the Back or the Ocean and the Bay where St Columba first landed on Iona.

Based on my own local knowledge, I also wish to highlight that: Yes the entire area will be effected negatively, it's timelessness and remoteness would be defiled.

Finally, I would also ask the Scottish Ministers to consider: This site is unique in its emotional, cultural and very human responses to being on the edge of time and in the sweep of eternity. It's cherished by the world.

1.1.31 Summary

The proposal 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 cultural heritage and communities along the coast. Independent assessments 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 were identified, they have not been properly evaluated. Furthermore, the ecological criteria essential to the proposal have not been demonstrated as achievable. It is also important to note that the application before the Scottish Ministers covers only a portion of the overall project.

In light of these deficiencies, I urge the Scottish Ministers to decline consent for the MachairWind Offshore Wind Farm and to refuse the accompanying marine licence. Should the Ministers consider an alternative course, I request that additional

environmental information be obtained and that enhanced visualisations be provided. Moreover, I recommend that the applications be determined only after a public inquiry has been convened, allowing for a thorough examination of the concerns raised in this objection. Regardless of the outcome, I ask that the Ministers explicitly address the effects on cultural heritage and the island communities within their stated 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 604
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.

1.1.32 Legislative and Policy Framework

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

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

Given these deficiencies and the lack of demonstrated compliance with the statutory duties under Schedule 9, the application conflicts with the applicable legal and policy framework. As established, where such conflicts or omissions exist, they weigh decisively against the granting of consent. Therefore, the application should be

refused on the basis that it does not meet the mandatory statutory requirements of the Electricity Act 1989.

The marine licence application 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 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 application fails to comply with the statutory requirements under the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which mandate that the likely significant environmental effects of the proposal must be identified, assessed, and reported

prior to any determination. This fundamental procedural omission undermines the decision-making process and renders the application incomplete and unlawful.

Furthermore, the proposal does not satisfy the obligations imposed by the Habitats Regulations, which require a thorough assessment of the effects on European protected sites in accordance with the applicable statutory tests. The absence of such an assessment means that the potential impacts on protected habitats and species remain unknown and unmitigated, directly contravening the legal framework designed to safeguard these sites.

Given these clear deficiencies and failures to demonstrate compliance with both environmental impact assessment and habitats regulations, the application conflicts with the relevant legal and policy requirements. As established by the approved evidence, such unresolved matters must weigh decisively against the granting of consent for this proposal.

The proposal fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be properly considered and given due weight in the decision-making process. This statutory obligation is fundamental and non-negotiable, yet the submitted documentation does not provide adequate evidence that these interests have been sufficiently addressed or balanced against other considerations.

Moreover, the absence of clear assessment or mitigation measures specifically tailored to the unique circumstances of island communities represents a significant omission. Without such evidence, the proposal cannot be said to meet the legal and policy framework established by the Islands (Scotland) Act 2018. This deficiency undermines the integrity of the decision-making process and fails to uphold the statutory protections intended for island populations.

Given these shortcomings, the failure to properly consider and weigh the interests of island communities constitutes a material conflict with the applicable legislation. As established, where compliance is not demonstrated or where deficiencies exist, these factors must weigh against the granting of consent. Therefore, the proposal should be refused on the basis that it does not satisfy the statutory requirements of the Islands (Scotland) Act 2018.

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

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

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

1.1.33 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.

When assessing the proposal against the relevant policies within NPF4, it becomes apparent that the necessary mitigation measures to prevent significant adverse effects on designated assets have not been satisfactorily demonstrated. Policy 11 must be considered alongside Policy 4(c) and 4(d), which afford protection to National Scenic Areas and nationally important landscapes by preventing significant adverse impacts on the qualities for which these areas are designated. In addition, Policies 7(h), 7(c), and 7(d) specifically safeguard scheduled monuments, their settings, and other historic assets. Policy 3 further requires the protection of biodiversity. The evidence submitted fails to show that the proposal's impacts can be effectively mitigated to a degree that would comply with these interconnected policies, particularly in relation to the preservation of landscape qualities, heritage asset significance, and ecological integrity.

Moreover, the proposal falls short in demonstrating that it would safeguard island communities and their unique cultural and environmental contexts, which are fundamental considerations under these policies. The significant adverse effects anticipated on nationally designated landscapes and seascapes are not adequately addressed, nor has the cultural significance of scheduled monuments and their

settings been convincingly protected. The ecological assessments submitted do not meet the requisite tests to confirm that biodiversity interests would be maintained or enhanced. Taken together, these shortcomings establish a clear conflict with multiple NPF4 policies designed to protect nationally important landscapes, heritage assets, and biodiversity, thereby undermining the proposal's compliance with the national planning framework.

The proposal 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.

1.1.34 Seascape, Landscape and Visual Effects

The applicant's assessment methodology lacks a defined distance threshold beyond which major effects are considered to cease, undermining the reliability of the predicted impacts. Analysis of the applicant's own Chapter 16 and Appendices 16.1 to 16.3 reveals a consistent pattern across all assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of its sensitivity or visibility. Furthermore, the applicant's documentation acknowledges the influence of distance on judgements; for example, an assessment of a coastal area over 30 kilometres away concludes that the scale of change is small due to the viewing distance. The Landscape Character synthesis similarly categorises magnitude as High within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. This systematic moderation of magnitude at distances where the most sensitive designated landscapes lie results in understated inputs to the protective tests. Consequently, the conclusions drawn do not reliably represent the effects the Scottish Ministers are being asked to consider.

The 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.

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.

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.

1.1.35 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.

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 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 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.

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

This shortcoming is a direct breach of established policy and statutory duties. Specifically, the proposal engages GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions be based on robust socio-economic

evidence, applying a precautionary approach where evidence is insufficient. It also involves NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, both of which require that the interests of island communities be thoroughly assessed and accorded appropriate weight through meaningful engagement from the earliest stages to the conclusion of the process.

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

1.1.37 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.

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 has not demonstrated that the statutory tests designed to protect internationally important habitats and species can be satisfied. This conclusion arises directly from the evidence submitted, including the applicant’s own derogation documents, which collectively reveal an absence of the requisite certainty regarding compliance with these legal requirements. Without clear and convincing evidence that these statutory tests are met, the application fails to fulfil the legal obligations necessary to safeguard internationally significant ecological features. Consequently, this undermines the justification for granting consent, as the statutory protections remain unaddressed and the potential for adverse impacts on protected habitats and species cannot be adequately ruled out.

1.1.38 Cumulative and In-Combination Effects

The current assessment approach submitted to the Scottish Ministers is fundamentally flawed, as only a portion of the overall project—the wind farm itself—is under consideration. Crucially, the export cable corridor and onshore transmission works, which are indispensable for the wind farm’s operation, have been deferred to separate future applications. This fragmentation means that the environmental and cumulative effects of the entire project are never evaluated in a single, comprehensive process. Instead, significant components are subject to subsequent consenting procedures following the principal decision, thereby undermining a holistic understanding of the project's impacts.

Such an approach conflicts with established legal principles, as underscored by the courts in Raeshaw Farms, which mandate that a project must be assessed in its entirety rather than being artificially segmented into parts whose individual effects may seem less significant. By salami-slicing the project, the assessment fails to

capture the full scope of potential environmental and social consequences, rendering the decision-making process incomplete and procedurally unsound. Consequently, this piecemeal evaluation is contrary to both legal precedent and sound planning practice, and should be reconsidered to ensure a thorough and integrated assessment of all project elements.

The cumulative impact assessment 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, 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.

1.1.39 Public Engagement, Site Selection and Environmental Information

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

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

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

The Environmental Impact Assessment (EIA) submitted with this application falls short of providing sufficiently robust evidence for the Scottish Ministers to make an informed decision. While the EIA is comprehensive in scope, its adequacy cannot be judged by extent alone but by the reliability and completeness of its findings. In this case, the assessment identifies potential pathways to significant environmental effects but fails to investigate these comprehensively. For example, the landscape assessment relies on a distance-based pattern of impact that is unsupported by its own stated methodology. Similarly, the heritage assessment does not convincingly apply its integrity test, and the socio-economic evaluation lacks any place-based analysis pertinent to the affected island communities. These methodological shortcomings undermine the credibility of the conclusions drawn and do not satisfy the requirement for clarity on likely significant effects prior to determination.

Furthermore, the application’s dependence on future assessments, post-consent plans, ongoing monitoring, and additional approvals to address outstanding environmental concerns is insufficient to meet the statutory requirements of the EIA Regulations. The regulations mandate that all likely significant effects be fully understood and assessed before consent is granted. Relying on measures to be implemented after consent does not remove this obligation. The Scottish Ministers must base their decision on the evidence currently before them, rather than on assumptions that unresolved issues will be adequately addressed later. The applicant has not demonstrated that the environmental information submitted is adequate or complete to support a lawful and informed determination.

1.1.40 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 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 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 effects on designated landscapes within the Loch na Keal National Scenic Area, including Ulva and Staffa, but underestimates the significance of these impacts. Ulva, a community-owned island undergoing regeneration, relies fundamentally on its unspoilt seascape and setting for recovery; yet no specific assessment has been undertaken to evaluate the effects on this vulnerable community. Staffa, 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 impacts on National Scenic Area qualities. Despite accepting its panoramic maritime qualities, the applicant concludes that the scale of change at Staffa would be small and the effect not significant, a position that discounts the island's acknowledged sensitivity and cultural importance.

Further afield, the applicant assesses the Jura National Scenic Area, situated around 28 to 32 kilometres from the site, as having high sensitivity but attributes only medium to low magnitude effects. This moderation is justified by distance, apparent scale, and retention of landforms, notwithstanding the fact that the designation fundamentally rests on the wild, undeveloped character of its Atlantic outlook. Similarly, the Scarba, Lunga and Garvellachs National Scenic Area, at approximately 35 to 40 kilometres distance, is afforded the same treatment. Such assessments fail to fully account for the cumulative and landscape-scale impacts on these seaboard designated landscapes and 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.

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 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.

1.1.41 Personal Observations

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

Finally, I would also ask the Scottish Ministers to consider: Another country should not be proposing something like this in our country especially with the massive amount of concerns surrounding the environment and ecological aspects.

1.1.42 Summary

The proposal before the Scottish Ministers fails to satisfy the statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal area. However, published analyses of the applicant's documentation reveal that the extent of these impacts has been underestimated. Crucially, the necessary heritage assessment has not been conducted, and although effects on the island communities involved were identified, no comprehensive assessment of these impacts has been undertaken. Furthermore, the ecological criteria pertinent to the proposal have not been demonstrated as achievable. It is also important to note that only a portion of the project is currently submitted for Ministerial consideration.

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

Should the Ministers consider proceeding without refusal, I request that they require the submission of further environmental information alongside enhanced visualisations. Moreover, I propose that the applications be determined only following a public inquiry, thereby allowing the issues raised in this objection to be thoroughly examined. Regardless of the decision reached, I further request that the Ministers provide clear conclusions within their reasons specifically addressing the effects on cultural heritage and the impacted island communities.

Yours faithfully,

[Redacted]

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

Member of the public 605
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.

1.1.43 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 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.

1.1.44 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.

1.1.45 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.

1.1.46 Personal Observations

Finally, I would also ask the Scottish Ministers to consider: The centuries long spiritaul importance of Iona is a living spiritual community which extends beyond the island itself. the impacts of this on the sacred well-being of this place, as well as the

environmental impacts of this project are deeply concerning. Iona will cease to be wholly itself if this project moves forward.

1.1.47 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 606
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.

1.1.48 Legislative and Policy Framework

The application fails to provide the requisite Environmental Impact Assessment (EIA) and Habitats Regulations Assessment (HRA) as mandated by law, creating significant uncertainty regarding its compliance with statutory requirements. Under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations, it is imperative that the likely significant environmental effects of the proposal are identified, assessed, and reported prior to any determination. Furthermore, the Habitats Regulations mandate a thorough assessment of the proposal's effects on European protected sites in accordance with the applicable statutory tests. The absence of demonstrated compliance with these legal obligations, coupled with evident deficiencies and omissions in the submitted evidence, directly conflicts with the established legal and policy framework. Such failures weigh decisively against the granting of consent for this proposal.

There is significant uncertainty as to whether the proposal has adequately considered and given due weight to the interests of island communities, as mandated by the Islands (Scotland) Act 2018. This statutory requirement is clear: the interests of island communities must be explicitly taken into account during the decision-making process. The evidence before the determining authority does not demonstrate compliance with this obligation. Instead, it reveals deficiencies and omissions in addressing the specific needs and circumstances of island communities. Such failures constitute a direct conflict with the applicable legal and

policy framework established by the Islands (Scotland) Act 2018. In accordance with established principles, where compliance with this statutory duty is not demonstrated, and where the evidence identifies such shortcomings, these matters must weigh decisively 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 law, the application should be refused.

1.1.49 Seascape, Landscape and Visual Effects

The practical consequence of the applicant's assessment methodology is a systematic understatement of the potential effects on the most sensitive designated landscapes, which are often located beyond 20 kilometres from the development area. This underrepresentation arises because the methodology does not explicitly define any distance threshold beyond which major effects cease. Nevertheless, an independent Evidence Note, drawing solely on the applicant's own Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern: no highly sensitive receptor situated beyond approximately 20 kilometres is attributed the highest magnitude of change, regardless of its sensitivity or the extent of its visibility to the development.

Further scrutiny of the applicant's documentation confirms the influence of distance on effect magnitude judgements. For instance, a coastal area more than 30 kilometres from the site is assessed as experiencing only a small scale of change due to the viewing distance. Moreover, the Landscape Character synthesis categorises magnitude of change as High within roughly 20 kilometres, Medium between approximately 20 and 30 kilometres, and Low beyond about 30 kilometres for certain landscape types. This gradation clearly demonstrates a built-in moderation of impact severity correlated with distance, which may not fully capture the true sensitivity and experiential quality of landscapes at these outer distances.

Consequently, the protective tests designed to safeguard landscape and visual amenity are being applied to inputs that systematically diminish the perceived magnitude of effects at the critical distances where the most sensitive designated landscapes are situated. As a result, the conclusions drawn by the applicant do not provide a reliable or comprehensive description of the effects on these landscapes. This undermines the decision-making process by Scottish Ministers, who are therefore being asked to consent based on an incomplete and potentially misleading assessment of impact.

While 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 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.

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.

1.1.50 Ecology, Biodiversity and Habitats Regulations

The proposed development site encompasses Priority Marine Features and Annex I habitats, which are recognised for their ecological sensitivity and conservation importance. These designations indicate habitats that are critical for the maintenance of marine biodiversity and are afforded protection under relevant environmental policies. The surrounding waters additionally provide habitat for protected species, including seabirds, marine mammals and basking sharks, all of which contribute to the ecological value of the area. While mitigation measures may be proposed to reduce adverse effects, the scale and duration of construction, operation and decommissioning activities—extending over decades—pose significant challenges to effectively safeguarding these sensitive features.

In comparison to typical mitigation strategies, the magnitude of the proposed development's environmental footprint within this marine environment raises concerns regarding residual impacts. The large-scale, long-term nature of the activities may limit the effectiveness of conventional mitigation, potentially resulting in significant adverse environmental effects. Given the presence of Priority Marine Features and protected species within and around the site, careful reconsideration of the development's scope, timing and mitigation approach is necessary to ensure compliance with environmental protection standards and to prevent irreversible harm to these important ecological assets.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan, specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area.

The preparation and presentation of these documents indicate a recognition by the applicant that there may be potential adverse effects on the integrity of this protected site as a result of the proposed development. Such documents are conventionally prepared and provided in circumstances where the possibility of an adverse effect cannot be definitively ruled out. The very inclusion of these materials in the application package is thus a significant feature, reflecting the applicant's acknowledgement of potential environmental impacts that warrant careful consideration.

Moreover, the submission of these derogation and compensation documents operates within the framework that the Scottish Ministers might ultimately reach a different conclusion regarding adverse effects than the applicant. This highlights a degree of uncertainty inherent in the assessment process and underscores the importance of these documents in addressing the requirements for derogation under relevant protection provisions. The compensation plan, focused on the guillemot population, seeks to mitigate potential harm to this protected species, aiming to offset any unavoidable impacts should the development proceed. In this context, the applicant's approach demonstrates an awareness of the statutory and policy obligations concerning protected sites and species, and an intention to comply with those obligations through appropriate mitigation and compensation measures.

The practical consequence of the stringent legal and policy framework under the Habitats Regulations is that planning consent for developments affecting protected habitats and species can only be granted when it is clearly demonstrated that the proposal will not adversely affect the integrity of the protected site. This requirement imposes a high evidential standard: no reasonable scientific doubt can remain regarding the absence of adverse effects. It is not sufficient for an applicant to rely solely on mitigation, compensation proposals, or commitments to future monitoring as these do not, by themselves, satisfy the statutory tests necessary to lawfully grant consent.

This legal framework is reinforced by relevant policy provisions, including GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). Together, these provisions ensure that developments are subject to rigorous assessment and that consent decisions are made only when the strict derogation tests are conclusively met. Consequently, the burden of proof lies firmly with the applicant to provide robust, scientific evidence that the proposed development will not compromise the protected habitat's integrity before any consent can be lawfully granted.

The applicant's own derogation documents form the primary basis of the evidence submitted in support of the application. However, a careful examination of these documents reveals a significant lack of certainty regarding the satisfaction of the statutory tests that are legally required to protect internationally important habitats and species. The information provided does not adequately demonstrate that the necessary conditions for derogation have been met, raising substantial doubts about the application's compliance with these critical environmental safeguards. This evidential deficiency is particularly concerning given the stringent nature of the statutory tests designed to ensure that any adverse impacts on internationally designated ecological features are rigorously justified and mitigated.

Consequently, the failure to provide clear, convincing proof that the statutory tests can be satisfied fundamentally undermines the application's case for consent. Without meeting these legal requirements, the proposed development cannot be considered compliant with the obligations to protect internationally important ecological assets. The absence of demonstrated compliance not only contravenes statutory protections but also weakens the overall planning justification. In light of this, the application should not be granted consent until such time as the applicant can unequivocally establish that all statutory tests have been fully and satisfactorily met.

1.1.51 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.

While some mitigation measures have been proposed, they do not adequately address the significant and underestimated impacts on Iona. The Coastal Character assessment recognises the Sound of Iona as having high sensitivity, with a direct orientation towards the development area and extensive visibility spanning approximately 21 kilometres. The turbines would extend across about 39 degrees of the horizon, resulting in a moderate and significant overall effect that is unlikely to be fully mitigated. Similarly, the West Coast of Iona is identified as highly sensitive with widespread visibility, and the applicant concedes significant effects on residents and visitors across much of the island, including at its highest point, Dùn Ì. Furthermore, Iona's internationally important monastic landscape—comprising the Abbey, the Nunnery, and the high crosses—is closely tied to pilgrimage and arrival by sea. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing, yet no visualisation has been provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, leaving a critical gap in the assessment of

heritage impacts. Community concerns reinforce these findings; a household consultation revealed that 92 per cent of respondents on Iona object to the proposal, and notably, the applicant's own consultants identified habitability as a potential pathway of effect for this community, which remains unassessed. To contextualise the scale of the visual impact, the turbines' height would surpass that of Ben Hynish on Tiree—141 metres high and visible from Iona at approximately 33 kilometres—by approximately 194 metres, despite being situated at roughly two-thirds of that distance. Taken together, these factors demonstrate that the applicant's assessment understates the scale and significance of visual, community, and heritage impacts on Iona, thereby compromising the accuracy of the environmental and social impact evaluation.

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

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

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

The applicant's assessment 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 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 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 607
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.

1.1.53 Legislative and Policy Framework

The marine licence application under Part 4 of the Marine (Scotland) Act 2010 fails to demonstrate compliance with the statutory requirements of Scotland’s National Marine Plan, specifically the General Policies GEN 4, GEN 6, GEN 7, GEN 9, GEN 13, GEN 18, GEN 19, and GEN 21, along with their associated paragraphs. The application lacks sufficient evidence to confirm that the proposal adequately addresses co-existence with other marine users, protects the historic environment, conserves landscape and national scenic areas, safeguards natural heritage, ensures meaningful engagement, provides sound evidence, and accounts for cumulative impacts. This absence of demonstrated compliance constitutes a fundamental deficiency in the statutory assessment process.

Given these evidential shortcomings and omissions, the application conflicts with the applicable legal and policy framework governing marine licencing decisions. As established, where compliance has not been demonstrated or where deficiencies exist, such matters weigh decisively against the granting of consent. Therefore, the marine licence application should be refused on the grounds that it does not meet the mandatory requirements of the Marine (Scotland) Act 2010 and the National Marine Plan policies.

The proposal fails to demonstrate compliance with the mitigation requirements and policy objectives set out in National Planning Framework 4 (NPF4), specifically in relation to biodiversity, natural places, historic assets, and energy. This failure to meet the standards established by NPF4 policies significantly undermines the acceptability of the development.

National Planning Framework 4 is a significant material consideration that must be applied alongside the relevant statutory duties and legislative requirements. The proposal engages several key policies within NPF4, notably Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy). Each of these policies imposes clear obligations to protect and enhance environmental and heritage assets while ensuring sustainable energy use.

The submitted evidence does not demonstrate compliance with these policies. There are identifiable deficiencies and omissions in the proposal's approach to biodiversity protection under Policy 3, with no adequate measures shown to safeguard or enhance local habitats and species. Similarly, under Policy 4, the proposal fails to respect or maintain the integrity of natural places, lacking sufficient assessment or mitigation of impacts on the natural environment.

Regarding historic assets, Policy 7 requires careful consideration and protection of heritage sites and their settings. The proposal does not provide convincing evidence that it will avoid harm to historic assets or that any harm would be justified or appropriately mitigated. This omission conflicts with the statutory duties to preserve historic environment interests.

Finally, Policy 11 on energy mandates that developments contribute to sustainable energy objectives. The proposal does not adequately address these requirements, falling short of demonstrating how energy use and generation will align with the policy's aims.

Where compliance with these policies has not been demonstrated, or where the evidence identifies deficiencies, omissions, or conflicts with the applicable legal and policy framework, these matters weigh decisively against the granting of consent. Given the proposal's failure to satisfy the requirements of NPF4 Policies 3, 4, 7, and 11, it is contrary to the statutory and policy framework and should be refused planning permission.

The proposal fails to provide the comprehensive environmental impact assessment required under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which mandate that likely significant environmental effects must be identified, assessed, and reported prior to any determination. This omission undermines the statutory process designed to ensure informed decision-making and environmental protection.

Furthermore, the application does not demonstrate compliance with the Habitats Regulations, which require a thorough assessment of the proposal's effects on European protected sites in accordance with the applicable statutory tests. The absence of such an assessment constitutes a clear failure to meet legal obligations intended to safeguard designated habitats and species.

Given these deficiencies and the failure to provide the necessary evidence to demonstrate compliance with both the Environmental Impact Assessment and Habitats Regulations, the proposal conflicts with the relevant legal and policy framework. Such shortcomings must weigh decisively against the granting of consent.

The 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: the interests of island communities must be explicitly taken into account and given due weight during the decision-making process. The absence of such consideration undermines the integrity of the assessment and renders the proposal non-compliant with the legal framework governing developments affecting island populations.

The evidence demonstrates that compliance with the Islands (Scotland) Act 2018 has not been established in this case. There are identifiable deficiencies and omissions in the proposal's documentation and assessment regarding the impact on island communities. These shortcomings represent a direct conflict with the applicable legal and policy framework, which explicitly requires that the interests of island communities be a material consideration. The failure to address these matters appropriately is a significant procedural and substantive flaw.

Given these unresolved deficiencies and the clear statutory obligation, the proposal cannot be regarded as meeting the necessary legal standards. Where compliance with the Islands (Scotland) Act 2018 is not demonstrated, or where evidence reveals conflicts with the statutory requirements, such matters must weigh decisively against the granting of consent. Accordingly, the proposal should be refused on the grounds that it does not properly consider or give due weight to the interests of island communities as required by law.

The applicant has failed to provide robust, objective, and proportionate evidence demonstrating compliance with every relevant statutory duty, planning policy, and environmental assessment requirement. This failure represents a fundamental shortfall in meeting the evidential burden necessary for lawful determination. Without such demonstration, the application remains unsupported by the essential proof required under the established legal and policy frameworks.

Moreover, the submitted evidence reveals clear deficiencies and omissions that directly conflict with applicable legal and policy standards. These unresolved conflicts and gaps in compliance are material considerations that must weigh heavily against the granting of consent. The absence of satisfactory evidence undermines confidence in the proposal's conformity with statutory and policy obligations.

In conclusion, the applicant's inability to discharge the responsibility to demonstrate full compliance with all relevant legal and policy requirements constitutes a decisive reason to refuse consent. The evidential shortcomings identified are not minor or technical but go to the heart of lawful planning decision-making, mandating that the application be rejected.

1.1.54 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.

In considering the proposal, it is important first to assess the mitigation measures in relation to the relevant policies within the National Planning Framework 4 (NPF4) that are designed to protect nationally important assets. Policy 11 must be read in conjunction with Policies 4(c) and 4(d), which safeguard National Scenic Areas and nationally important landscapes from significant adverse effects on the qualities for which they have been designated. Additionally, Policy 7, particularly Policy 7(h) concerning scheduled monuments and Policies 7(c) and 7(d) on the setting of historic assets, alongside Policy 3 relating to biodiversity, collectively establish a robust framework to ensure the preservation of designated assets.

Upon detailed examination, the proposal fails to satisfy these interconnected policies. It would result in significant adverse effects on nationally designated landscapes and seascapes, contravening the protections envisaged under Policies 4(c) and 4(d). Furthermore, the evidence submitted does not demonstrate that the cultural significance of scheduled monuments and their settings would be adequately safeguarded, thus conflicting with the requirements of Policy 7. The protection of island communities, an important consideration within these policies, has also not been assured. Finally, the ecological assessments provided fail to meet the necessary tests stipulated under Policy 3, leaving uncertainty as to whether biodiversity interests can be effectively protected.

In conclusion, the proposal does not comply with multiple relevant NPF4 policies intended to protect designated landscapes, heritage assets, and biodiversity, resulting in significant adverse impacts that cannot be satisfactorily mitigated on the basis of the current evidence.

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.

1.1.55 Seascape, Landscape and Visual Effects

There is significant uncertainty regarding the reliability of the applicant's assessment methodology, particularly in how distance thresholds are applied to determine the magnitude of effects. The methodology outlined in Appendix 16.1 does not specify any distance beyond which major effects are considered to cease. Nonetheless, an independently prepared Evidence Note, based solely on the applicant's Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern across all assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of the receptor's sensitivity or the extent of visibility. This finding is further corroborated by the applicant's own documents, which acknowledge distance as a key factor in their judgements. For example, an assessment of a coastal area over 30 kilometres away concludes that, given the viewing distance, the scale of change is small. Additionally, the Landscape Character synthesis categorises magnitude as High within roughly 20 kilometres, Medium between about 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. The practical effect of this approach is that the protective tests are applied to inputs that systematically understate magnitude at precisely the distances where the most sensitive designated landscapes are located. Consequently, the conclusions presented cannot be relied upon to accurately describe the effects that the Scottish Ministers are being asked to consent.

The visualisation materials submitted in support of the application do not fully convey the true scale and impact of the proposed development as it would be experienced on site. NatureScot's visualisation guidance, which the applicant has followed, explicitly recognises that printed visualisations are unable to replicate the actual scale perceived by a viewer in the field. This limitation means that the images provided are inherently constrained in their capacity to represent the development's visual presence with complete accuracy.

Furthermore, the wireline drawings included within the panoramic visualisations share the same limitations as the photographic components they accompany. Rather than serving as an independent means to correct or enhance the photographic images, these wirelines are a technical rendering embedded within the visualisation package. As such, they cannot be relied upon to provide a fully objective or comprehensive representation of the potential visual effects, but rather should be understood as part of the overall visualisation that is subject to the same perceptual and technical constraints.

Given these acknowledged limitations, it is important that decision-makers approach the visual evidence with caution and do not place undue reliance on the submitted materials alone to assess the visual impact of the proposal. Supplementary on-site

assessments and a thorough understanding of the guidance's caveats are essential to form a balanced and informed judgement on the visual effects of the development.

The introduction of aviation and navigation lighting to an otherwise unlit sea horizon will permanently alter the character of the night-time seascape for the full 35-year operational period of the development. This change is not merely a temporary inconvenience; it represents a fundamental and lasting transformation of the visual environment. Moreover, from a policy perspective, granting consent for this development effectively endorses the suitability of this seascape for wind farm use, thereby setting a precedent for future decisions. Such implications must be carefully weighed in considering the acceptability of the proposal.

The proposal'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.

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

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

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

The heritage impact assessment relies heavily on the findings of the landscape assessment, which serves as a foundational element in determining the extent of heritage effects. However, as established, the landscape assessment has systematically understated the magnitude of landscape effects. This understatement inevitably permeates the heritage conclusions, resulting in an overall minimisation of the potential heritage impacts. Consequently, the credibility of the heritage impact conclusions is compromised by their dependence on an assessment that does not fully capture the true extent of landscape effects. It follows that any mitigation measures proposed, based on these heritage conclusions, may be insufficient to address the actual level of harm. Therefore, the reliance on the current landscape assessment undermines the robustness of the heritage impact evaluation, warranting a more thorough and accurate assessment to inform appropriate mitigation strategies.

The 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.

1.1.57 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 own consultants acknowledged that habitability represents a potentially significant pathway through which the proposed development could impact island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 addresses impacts primarily at a regional scale, focusing in detail on potential port communities but failing to provide an equivalent place-based evaluation of the island communities directly facing the development. Notwithstanding this lack of targeted analysis, the assessment

nonetheless concludes that those island communities exhibit low sensitivity to tourism effects.

This approach overlooks critical distinctions between small island economies and broader regional averages. Small island economies are concentrated in sectors that are particularly vulnerable to alterations in the qualities that attract visitors. Far from mitigating sensitivity, a reliance on increasing visitor numbers actually intensifies dependence on these at-risk qualities. Therefore, the conclusion of low sensitivity drawn without a place-based analysis cannot be regarded as evidence but must be seen as an unsubstantiated assumption.

Given these significant methodological shortcomings, the socio-economic assessment does not provide a reliable understanding of the potential impacts on island communities. A more nuanced, place-specific evaluation is necessary to accurately assess and mitigate the effects of the proposed development on these sensitive economies. Without this, the assessment falls short of informing appropriate planning decisions regarding the proposal's effects on island communities.

There remains 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.

1.1.58 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 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.

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.

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.

1.1.59 Cumulative and In-Combination Effects

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

The practical consequence of relying on the current cumulative impact assessment is that it significantly underestimates the true combined effects of the proposed development alongside existing, consented, and foreseeable projects. This underestimation arises because the assessment is founded on baseline conclusions that themselves understate the impacts on landscape, heritage, and socio-economic factors. Consequently, decision-makers may be misled about the scale and severity of the cumulative impacts when considering the overall acceptability of the proposal.

This issue stems directly from the methodology employed in the Environmental Impact Assessment, where the baseline assessments for key receptors are flawed. As these initial evaluations set the foundation for the cumulative impact assessment, any understatement at this stage propagates through subsequent analyses. The result is a diminished perception of the combined effects, which fails to capture the full extent of the potential harm when the proposal is considered in context with other developments in the area.

Given these concerns, it is essential that the cumulative effects are reassessed using more accurate and robust baseline data to ensure a reliable understanding of the overall impact. Until such improvements are made, the current assessment cannot be regarded as a sound basis for planning decisions, and the cumulative impacts of the proposal remain inadequately addressed.

The applicant's submission fails to demonstrate compliance with GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the Environmental Impact Assessment Regulations regarding project splitting. Specifically, the cumulative and in-combination effects of the proposal, as well as the impacts of the project in its entirety, have not been reliably identified or assessed. This omission raises significant concerns about the adequacy of the environmental appraisal and undermines the robustness of the decision-making process. Consequently, it is

essential that the determination explicitly addresses the treatment of any deferred works to ensure full consideration of all potential effects, in accordance with the relevant policy and regulatory requirements.

1.1.60 Public Engagement, Site Selection and Environmental Information

The practical consequence of the deficiencies in public participation and consultation timing is that the affected communities have been denied a realistic opportunity to engage meaningfully with a complex and technically dense application, thereby undermining the legitimacy of the site-selection process. The applicant requests that Scottish Ministers place significant weight on the site-selection process; accordingly, the quality of public participation at that stage is directly material to the decision. However, the deficiencies observed during the plan and site-selection stages have persisted into the application phase. The application itself consists of many thousands of pages of technical material, submitted during the busiest months for island communities, when residents are fully occupied by the visitor season and specialist advice is least accessible. In contrast, the applicant has had years to prepare its case with 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 genuine and realistic opportunity to participate. The circumstances under which the affected communities have been expected to respond fall short of these standards. Therefore, it is imperative that Ministers give careful weight to these shortcomings when considering the representations made.

The Environmental Impact Assessment submitted in support of this application falls short in providing a sufficiently robust evidential foundation for the Scottish Ministers to make an informed decision. While the assessment identifies numerous pathways to potentially significant environmental effects, it fails to investigate these comprehensively. Specifically, the landscape assessment relies on conclusions that follow a distance-based pattern not supported by its own stated methodology. Similarly, the heritage assessment does not adequately apply its integrity test, and the socio-economic assessment lacks any place-based analysis of the affected island communities. These deficiencies collectively undermine the reliability of the environmental information presented.

Moreover, the application frequently defers crucial analysis to future stages, including post-consent plans, monitoring programmes, and additional approvals. Such reliance conflicts with the requirements of the EIA Regulations, which mandate that likely significant effects must be fully understood prior to determination. Deferring key assessments to later stages cannot substitute for the thorough, upfront evaluation necessary to ensure that environmental impacts are properly considered before consent is granted. This approach leaves critical uncertainties unresolved at the point of decision-making.

It is therefore essential that the Scottish Ministers base their determination solely on the evidence currently before them, without assuming that outstanding matters will be satisfactorily addressed later. The applicant has not demonstrated that the environmental information submitted is adequate for this purpose. Consequently, the

application should not be approved in its present form, as the insufficiency of the Environmental Impact Assessment precludes a fully informed and lawful decision.

1.1.61 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 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 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 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 characterises the South Tiree coastal area as having a High sensitivity at a distance of approximately 35 kilometres, while concurrently attributing a Low magnitude of change to the proposed development. This dual classification appears contradictory, given the acknowledged sensitivity of the receptor in question. The sensitivity rating recognises the intrinsic value and vulnerability of the coastal landscape, yet the Low magnitude conclusion suggests a minimal impact, a juxtaposition that warrants closer scrutiny.

Tiree's landscape is distinguished by its exceptional low-lying nature, with its defining characteristics rooted in the vast expanse of sea and sky that envelops the island. The highest elevation, Ben Hynish, reaches only 141 metres, underscoring the island's predominantly flat topography. In this context, the introduction of turbines reaching heights of up to 335 metres would represent vertical intrusions unprecedented in the seascape. Such structures would disrupt the open oceanic horizon that is central to Tiree's distinctive character, introducing elements that are fundamentally at odds with the existing landscape fabric.

The conclusion that the magnitude of change would be Low fails to acknowledge the profound alteration these turbines would effect on the visual and experiential qualities of the island's seascape. Given the sensitivity of the receptor and the scale of the proposed development, this Low magnitude finding exemplifies a significant understatement of effects. Consequently, the evaluation provided by the applicant lacks reliability in its appraisal of the impact on Tiree's sensitive and distinctive landscape character, suggesting the need for a more rigorous and balanced assessment.

The applicant’s assessment 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.

1.1.62 Personal Observations

In addition to the planning matters above, I am personally concerned because: No benefit to the community, electricity would go elsewhere, visual impact would be negative for tourism

Based on my own local knowledge, I also wish to highlight that: Visual negativity for tourism which is vital for these communities, ecological disaster for seabirds

Finally, I would also ask the Scottish Ministers to consider: The views of all islanders

1.1.63 Summary

The proposal put forward by the applicant fails to meet the requirements set by the relevant statutory and policy framework governing its determination. Notably, the applicant’s own evaluations acknowledge substantial impacts on nationally designated landscapes, as well as on the heritage and communities along this

coastal region. Independent reviews of the applicant's documentation reveal that the extent of these impacts has been underestimated. Additionally, a comprehensive heritage assessment, as mandated, has not been undertaken. While the adverse effects on the island communities directly affected by the development were identified, no formal assessment of these impacts has been conducted. Furthermore, the ecological criteria necessary for approval have not been demonstrated to be achievable. Compounding these concerns is the fact that only a portion of the proposed project has been submitted for consideration by the Scottish Ministers.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm proposal, as well as to decline the associated marine licence application.

Should the Ministers be inclined to grant consent, I request that additional environmental information be provided alongside enhanced visual representations. Moreover, I propose that the determination of these applications be deferred until a public inquiry has been convened, allowing for a thorough examination of all issues raised in this objection. Regardless of the final decision, I also implore the Ministers to include clear conclusions in their reasoning with respect to the impacts on cultural heritage and the island communities affected by the development.

Yours faithfully,

[Redacted]

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

Member of the public 608
Dear Sir/Madam,

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

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

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

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

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

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

The proposal's acknowledged effects engage multiple 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.

1.1.65 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 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 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 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.

1.1.66 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development rely to an exceptional degree on visitors, who are drawn specifically by the qualities identified in the applicant's own baseline assessments: landscape, seascape, cultural heritage, tranquillity and remoteness. These attributes form the fundamental appeal that sustains visitor numbers and underpin the local economy.

Any alteration to these defining characteristics would directly undermine the economic foundation of these communities. Such an impact would inevitably extend beyond immediate economic effects, threatening local services, reducing population stability, and ultimately jeopardising the long-term viability of the island settlements. Consequently, the proposal poses a significant risk to the fundamental economic and social sustainability of these island communities.

The practical consequence of the applicant's flawed socio-economic assessment is a significant 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 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.

1.1.67 Ecology, Biodiversity and Habitats Regulations

The proposed development site encompasses Priority Marine Features and Annex I habitats, which are recognised for their ecological sensitivity and conservation importance. These designations indicate habitats that are critical for the maintenance of marine biodiversity and are afforded protection under relevant environmental policies. The surrounding waters additionally provide habitat for protected species, including seabirds, marine mammals and basking sharks, all of which contribute to the ecological value of the area. While mitigation measures may be proposed to reduce adverse effects, the scale and duration of construction, operation and decommissioning activities—extending over decades—pose significant challenges to effectively safeguarding these sensitive features.

In comparison to typical mitigation strategies, the magnitude of the proposed development's environmental footprint within this marine environment raises concerns regarding residual impacts. The large-scale, long-term nature of the activities may limit the effectiveness of conventional mitigation, potentially resulting in significant adverse environmental effects. Given the presence of Priority Marine Features and protected species within and around the site, careful reconsideration of the development's scope, timing and mitigation approach is necessary to ensure compliance with environmental protection standards and to prevent irreversible harm to these important ecological assets.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically addressing the guillemot population at 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 this application highlights the applicant's acknowledgement of potential impacts on this designated area.

These submissions indicate the applicant's intention to comply with relevant derogation provisions, seeking to mitigate any identified harm through appropriate compensation measures. The focus on the guillemot population underscores the recognised sensitivity of this species within the Special Protection Area, and the need for targeted management strategies to address potential ecological consequences.

Nonetheless, it remains clear that the applicant's position anticipates a degree of uncertainty, as they acknowledge that the Scottish Ministers may ultimately reach a different conclusion regarding the likelihood of adverse effects. Therefore, while the submitted derogation and compensation documents form a key component of the application, further scrutiny will be necessary to establish whether the proposed measures are sufficient to satisfy statutory environmental safeguards.

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.

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 establish with sufficient certainty that these legal requirements can be met. This lack of demonstrable compliance undermines confidence in the application's ecological safeguards.

Given this insufficiency of evidence, it is clear that the application does not meet the necessary legal standards intended to prevent harm to internationally protected ecological features. On this basis, the case for granting consent is fundamentally weakened and cannot be supported.

1.1.68 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 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.

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.

1.1.69 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.

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.

1.1.70 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 approach taken primarily views Islay in terms of its potential function as a direct project location, rather than as an affected island community in its own right. This perspective fails to provide a place-based evaluation of the effects on Islay's Atlantic-facing communities, which confront the nearest edge of the 448 square kilometre development area. Consequently, the assessment does not adequately consider the potential impacts on the setting, economy, or community life of these populations.

For Colonsay and Oronsay, the situation is more acute given that their seaward outlook directly faces the proposed array. 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 acknowledgement indicates an acceptance that harm to the internationally protected seabird population in this area cannot be excluded. Furthermore, Oronsay Priory, a scheduled monument of national importance, lies within this community's vicinity, yet the

heritage assessment does not adequately address the impact on its open maritime setting. These deficiencies collectively undermine the reliability of the environmental and heritage impact evaluation for the communities, economy, and heritage of Islay, Colonsay, and Oronsay.

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.

In comparing the applicant's assessment with the actual impacts on Mull and the Ross of Mull, it becomes evident that the proposed mitigation measures do not adequately address the significant visual and community effects. While the applicant acknowledges significant effects at locations such as Erraid, on the Core Paths of the Ross, and at Fionnphort—the gateway to Iona and a vital point for visitor embarkation—these admissions highlight only a portion of the wider impacts experienced by these coastal communities. The assessment attributes a Medium magnitude of effect at distances of approximately 22 to 24 kilometres, yet the significance of these effects on local communities that depend on visitor flows is not sufficiently explored or mitigated.

Moreover, across Mull itself, the applicant concedes significant effects on Core Paths and within Local Landscape Areas including Central, South, and West Mull. The Loch na Keal National Scenic Area, encompassing Mull's western waters and

islands, is correctly identified as having High sensitivity at distances ranging from 21 to 33 kilometres. However, the applicant's assignment of no more than Medium magnitude to this area appears inconsistent with the landscape's designation and its importance to local tourism and wildlife. This underestimation of magnitude undermines the assessment's reliability and raises concerns about the adequacy of proposed mitigation in preserving the scenic and community values of these designated landscapes.

Finally, the applicant's reliance on distance-based reasoning, as demonstrated in the treatment of the Wilderness and Gribun Rocks coastal area, where changes at over 30 kilometres are judged to be small, fails to fully appreciate the character and economic dependence of Mull's west-facing communities. These communities, including wildlife boat operators and accommodation providers, rely heavily on the integrity of the Atlantic seascape, which the development risks industrialising. Notably, none of these communities has been subject to a detailed, place-based assessment, leaving a significant gap in understanding and addressing the potential adverse effects. This omission calls into question the robustness of the applicant's evaluation and the sufficiency of mitigation measures proposed for the area's distinctive coastal environment and its tourism-dependent economy.

The applicant's assessment fails to adequately recognise significant impacts on important designated landscapes and vulnerable island communities, thereby undermining the protection of their natural and cultural qualities. Ulva, situated within the Loch na Keal National Scenic Area, is a community-owned island undergoing regeneration. This small, re-establishing community relies fundamentally on the unspoilt seascape and setting that the development threatens, yet no specific assessment of effects on Ulva has been undertaken. Similarly, Staffa, also within the Loch na Keal National Scenic Area and renowned across Europe, lies approximately 35 kilometres from the development. Despite NatureScot's recommendation to assess effects up to 30 kilometres, the applicant dismisses the impact on Staffa as small and not significant, even though their own analysis acknowledges its panoramic maritime qualities. The Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed at a High sensitivity level from 28 to 32 kilometres distance but is attributed only Medium to Low magnitude effects due to distance and retained landforms, a conclusion that appears to downplay the importance of its defining characteristics. The Scarba, Lunga and the Garvellachs National Scenic Area, located between 35 and 40 kilometres away, is treated similarly. Collectively, these assessments underestimate or omit meaningful effects on designated landscapes and island communities, risking harm to their essential qualities and the viability of fragile local populations.

The applicant's assessment significantly 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 not adequately addressed the significant effects of the proposed development on mainland and island communities with direct visual and economic connections to the seascape. For example, Gigha—a community-owned island celebrated as a national emblem of island regeneration—faces the development waters from the east. The potential impacts on its carefully balanced community and economy remain unexamined, representing a notable omission in the applicant's evaluation. Similarly, Ardnamurchan Point, the westernmost point of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas are precisely the types of receptors for which the applicant's distance-based moderation approach is applied, raising concerns about the adequacy of the assessment in capturing their significance.

Further, the west coast of Kintyre comprises a series of communities whose identity, character, and visitor economy are intrinsically linked to the open Atlantic seaboard views towards Islay, Jura, and adjacent waters. The Treshnish Isles and other small islands, alongside mainland coasts with views of the development area, share this position of reliance on the seascape. Despite this, the applicant's assessment appears to have overlooked these receptors, undermining the comprehensiveness of the environmental and socio-economic evaluation. Such gaps in the analysis risk compromising the robustness of the decision-making process and warrant thorough reconsideration to ensure that all affected communities are properly accounted for.

The applicant's 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.

1.1.71 Personal Observations

Based on my own local knowledge, I also wish to highlight that: Iona is a sacred place which should be preserved, that I will visit with my friends and family in the years to come.

Finally, I would also ask the Scottish Ministers to consider: I hope that when I, and many others, visit Iona we will find it preserved as the spiritual site that it has been for generations.

1.1.72 Summary

The proposal put forward by the applicant fails to satisfy the statutory and policy requirements governing its determination. Their own evaluation acknowledges significant impacts upon nationally designated landscapes, as well as the cultural heritage and communities along this coastline. Independent analyses of the applicant's documentation reveal that these impacts have been understated. Moreover, a comprehensive heritage assessment, as mandated, has not been completed. The identified effects on the island communities within the project's influence have neither been adequately assessed nor addressed. Additionally, the ecological criteria necessary to demonstrate compliance remain unproven. It is also pertinent that only a portion of the overall project is currently submitted for consideration by the Scottish Ministers.

Given these substantial deficiencies, it is respectfully submitted that the Scottish Ministers should refuse consent for the MachairWind Offshore Wind Farm proposal and reject the associated marine licence application.

Should the Scottish Ministers be inclined not to refuse consent outright, it is requested that they require the submission of further environmental information alongside enhanced visualisations. Furthermore, it is essential that the applications be determined only following a public inquiry, thereby allowing thorough examination of the concerns raised in this objection. Irrespective of the final decision, it is also requested that the Ministers explicitly address and articulate their conclusions regarding the effects on cultural heritage and on the island communities impacted by the proposal.

Yours faithfully,

[Redacted]

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

Member of the public 609
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, corresponding to application 00012385 for consent pursuant to section 36 of the Electricity Act 1989, alongside application 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. These applications, submitted by MachairWind Limited (ScottishPower Renewables), seek approval for a substantial offshore wind energy development.

The proposed project entails the installation of an offshore wind farm with an anticipated generating capacity of approximately 2 gigawatts. It comprises between 91 and 144 turbines, each reaching up to 335 metres to blade tip, situated within an extensive Windfarm Development Area covering about 448 square kilometres. This area lies to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in proximity to the islands and coastal communities of the southern Hebrides.

My objection is grounded on planning and environmental considerations addressed within the statutory and policy frameworks governing the determination of these applications. It is important to emphasise that the responsibility to satisfy the relevant legal and policy tests rests entirely with the applicant, who must provide sufficient evidence to demonstrate compliance. Objectors are not obligated to prove the contrary. In this instance, the applicant has failed to meet this evidential burden, and accordingly, I contend that consent for the development should be withheld.

I request that this communication be formally recognised as an objection, that my status as an objector be recorded, and that I be kept informed of the final decision regarding these applications.

1.1.73 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 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 demonstrate compliance with the mitigation requirements set out in National Planning Framework 4, specifically in relation to Policies 3, 4, 7, and 11. Policy 3 mandates the protection and enhancement of biodiversity, yet the application does not provide sufficient evidence that biodiversity impacts have been adequately assessed or mitigated. Similarly, Policy 4 requires the safeguarding of natural places, but the proposal omits necessary measures to prevent harm to these environments. Policy 7 demands careful consideration of historic assets and places, yet the submission lacks comprehensive evaluation or mitigation strategies to address potential adverse effects on heritage assets. Furthermore, Policy 11 on energy necessitates adherence to sustainable energy principles, which the proposal fails to substantiate. The absence of robust mitigation strategies and the failure to

demonstrate compliance with these policies indicate significant shortcomings in the application's approach to environmental and heritage protection.

National Planning Framework 4 is a significant material consideration that must be applied alongside statutory duties and legislative requirements. The evidence clearly identifies deficiencies, omissions, and conflicts between the proposal and the applicable legal and policy framework. Where compliance has not been demonstrated, these matters weigh decisively against the granting of consent. Given the proposal's failure to meet the explicit requirements of Policies 3, 4, 7, and 11, it is evident that the application does not accord with the National Planning Framework 4. Consequently, the proposal should be refused on the basis that it conflicts with essential national planning policies designed to protect biodiversity, natural places, historic assets, and energy sustainability.

The proposal fails to provide the comprehensive environmental impact assessment mandated by The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which require all likely significant environmental effects to be identified, assessed, and reported prior to determination. This fundamental procedural requirement has not been met, resulting in an incomplete understanding of the proposal's environmental consequences and undermining the statutory decision-making process.

Furthermore, the proposal does not demonstrate compliance with the Habitats Regulations, which obligate a thorough assessment of effects on European protected sites in accordance with the applicable statutory tests. The absence of such an assessment constitutes a clear deficiency and omission in the application. Given these failures to satisfy essential legal and policy requirements, the proposal conflicts with the established environmental protection framework. Consequently, these shortcomings weigh decisively against the granting of consent.

The proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018. This statutory requirement obliges decision-makers to explicitly account for the unique circumstances and needs of island communities during the planning process. The submitted documentation does not demonstrate compliance with this duty, nor does it provide adequate evidence that the interests of island communities have been sufficiently identified, assessed, or integrated into the decision-making framework. Such deficiencies constitute a clear omission and conflict with the applicable legal and policy framework. In accordance with the established principle that where compliance with the Islands (Scotland) Act 2018 is not demonstrated, or where evidence reveals shortcomings or legal conflicts, these factors must weigh against the granting of consent. Therefore, on the basis of the failure to properly consider and give due weight to island communities' interests as required by the Islands (Scotland) Act 2018, the application should be refused.

The applicant has failed to 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.

1.1.74 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 would result in significant adverse effects on nationally designated landscapes and seascapes, directly conflicting with established policy safeguards. Policy 11 operates alongside Policies 4(c) and 4(d), which protect National Scenic Areas and other nationally important landscapes by preventing significant harm to the qualities for which these areas are designated. In this instance, the submitted evidence does not demonstrate that these protections would be upheld, indicating a clear policy breach.

Furthermore, the proposal fails to satisfy key requirements concerning heritage and biodiversity. Policy 7, including provisions relating to scheduled monuments and their settings, mandates the protection of cultural significance, yet the proposal does not provide adequate assurance that these assets would be safeguarded. Similarly, Policy 3's ecological tests have not been shown to be met, and there is an absence of evidence confirming that island communities would be protected. Collectively, these shortcomings signify a failure to comply with the integrated framework of NPF4 policies designed to preserve 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.

1.1.75 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 may not accurately convey the true scale and impact of the proposed development as experienced on site. NatureScot's visualisation guidance, which the applicant has adopted, explicitly acknowledges that printed visualisations cannot fully replicate the scale perceived by a viewer in the field. This limitation means that stakeholders and decision-makers must exercise caution when interpreting these images, as they may underestimate or misjudge the development's visual presence within the landscape.

Furthermore, the wireline drawings included within the panoramic projections share the same inherent limitations as the accompanying photographic images. These drawings are technical renderings embedded within the visualisation and do not serve as independent corrections or enhancements to the photographs. Consequently, they do not overcome the fundamental constraints of the visual materials and cannot be relied upon to provide a fully accurate or objective representation of the proposed development's appearance. This recognition tempers the confidence that can be placed in the visual evidence as a comprehensive tool for assessing visual impact.

The 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'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.

1.1.76 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of the heritage impacts fails to comply fully with the required methodology, thereby undermining the reliability of its conclusions regarding the integrity of setting. Although the applicant adopts Historic Environment Scotland's recognised methodology for assessing effects on the setting of historic assets—a methodology developed and refined through consultation with Historic Environment Scotland—this approach necessitates more than a description of visual changes. It requires a thorough evaluation of whether alterations to setting affect the contribution that setting makes to the cultural significance of the asset, and crucially, whether the integrity of that setting is adequately retained. Importantly, the methodology explicitly states that visual change should not be directly equated with adverse impact.

A published Methodological Audit, prepared in support of community objections and based solely on the applicant's Appendix 14.3, confirms that while the operational assessment identifies relevant heritage attributes, it does not demonstrate how the integrity of setting has been evaluated in accordance with the applicant's own adopted methodology. The assessment focuses on describing visual elements such

as visibility, distance, monument prominence, retained views, screening, and skyline occupation, before concluding that the integrity of setting remains intact. However, the essential evaluative step required by the methodology—demonstrating how these visual factors influence the cultural significance and integrity of setting—is absent in all the examined worked examples. This omission calls into question the robustness of the assessment's findings.

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

Furthermore, the applicant has not supplied Scottish Ministers with the necessary assessment to confirm that the cultural significance of these heritage assets and their settings will indeed be preserved. This omission means that the decision-makers lack critical information required to evaluate the impact of the proposal on heritage values fully. Consequently, the application fails to satisfy the essential policy

test for heritage protection, undermining its acceptability within the planning framework. In light of these shortcomings, the proposal should not be supported.

1.1.77 Effects on Island Communities, Tourism and the Local Economy

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

The applicant's 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.

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.

1.1.78 Ecology, Biodiversity and Habitats Regulations

The proposed development site encompasses Priority Marine Features and Annex I habitats, which are recognised for their ecological sensitivity and conservation importance. These designations indicate habitats that are critical for the maintenance of marine biodiversity and are afforded protection under relevant environmental policies. The surrounding waters additionally provide habitat for protected species, including seabirds, marine mammals and basking sharks, all of which contribute to the ecological value of the area. While mitigation measures may be proposed to reduce adverse effects, the scale and duration of construction, operation and decommissioning activities—extending over decades—pose significant challenges to effectively safeguarding these sensitive features.

In comparison to typical mitigation strategies, the magnitude of the proposed development's environmental footprint within this marine environment raises concerns regarding residual impacts. The large-scale, long-term nature of the activities may limit the effectiveness of conventional mitigation, potentially resulting in significant adverse environmental effects. Given the presence of Priority Marine Features and protected species within and around the site, careful reconsideration of the development's scope, timing and mitigation approach is necessary to ensure compliance with environmental protection standards and to prevent irreversible harm to these important ecological assets.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically focused on the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are typically prepared in circumstances where an adverse effect on the integrity of a protected site cannot be ruled out. Their submission represents a notable aspect of the application, demonstrating that the applicant acknowledges the potential for such impacts.

By providing these materials, the applicant indicates an awareness that the Scottish Ministers may ultimately reach a different conclusion regarding the presence or absence of adverse effects on the protected site's integrity. This cautious approach reflects an understanding of the sensitivity of the designated area and the importance of addressing possible ecological consequences in a structured manner.

In submitting these derogation and compensation documents, the applicant seeks to ensure that, should any adverse impacts be identified, appropriate measures can be considered to mitigate harm to the guillemot population. This approach aligns with the regulatory framework governing protected sites, whereby derogations and compensatory provisions are necessary components when potential effects cannot be excluded at the outset.

The 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.

1.1.79 Cumulative and In-Combination Effects

The current approach to assessing the project falls short of legal and procedural requirements because it fragments the development, leaving crucial elements such as the export cable corridor and onshore transmission works outside the immediate scope of the Scottish Ministers' consideration. These components are essential for the wind farm's operation, yet their impacts are deferred to subsequent applications. This piecemeal method prevents a comprehensive evaluation of the project's cumulative effects, undermining the effectiveness of mitigation measures that rely on understanding the full scope of the development.

This fragmented assessment is inconsistent with the established legal principle upheld in Raeshaw Farms, which mandates that a project must be evaluated in its entirety rather than divided into smaller parts whose individual effects may appear less significant. By separating key infrastructure elements into later consenting processes, the current practice risks underestimating the true environmental and planning impacts, leading to decisions made without a full appreciation of all consequences. Such an approach compromises the integrity of the planning system and should be reconsidered to ensure that the entire project is subject to a single, comprehensive assessment.

The practical consequence of relying on the current cumulative impact assessment is that it significantly underestimates the true combined effects of the proposed development alongside existing, consented, and foreseeable projects. This stems directly from the reliance on baseline assessments within the Environmental Impact Assessment that have themselves understated landscape, heritage, and socio-economic effects. As a result, the starting point for the cumulative assessment is flawed, leading to an overall diminished understanding of the proposal's broader implications.

Analytically, because the cumulative assessment depends entirely on these baseline conclusions, any inaccuracies or omissions in the initial evaluations inevitably carry

through into the combined effects appraisal. Consequently, the assessment fails to capture the full scale and severity of cumulative impacts, reducing its reliability as a tool for informed decision-making. Without addressing these foundational understatements, the cumulative assessment cannot be regarded as a robust or comprehensive reflection of the development's true potential consequences.

The applicant has failed to demonstrate that the cumulative and in-combination effects of the proposed development, including the full scope of the project as a whole, have been reliably identified and assessed. This omission directly contravenes 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 to consider the totality of impacts arising from a project to prevent project splitting. Furthermore, the Environmental Impact Assessment Regulations explicitly mandate comprehensive assessment of all related works to ensure informed decision-making. Notably, the treatment of deferred works has not been expressly addressed within the application, leaving a significant gap in the evaluation of potential environmental consequences. In light of these deficiencies, it is imperative that the decision-making process explicitly incorporates an assessment of the deferred elements and their cumulative effects before any consent is granted. Without such consideration, the proposal remains non-compliant with both planning policy and environmental regulation, and permission should accordingly be withheld.

1.1.80 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.

1.1.81 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 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 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 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 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.

While the applicant's assessment applies distance-based mitigation to certain visual receptors, it fails to address significant effects on mainland and island communities whose seascape views and economic well-being are directly tied to the development

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

The applicant's environmental impact assessment 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: No local benefits and dramatic despoiling of this unique area of the Highlands

Based on my own local knowledge, I also wish to highlight that: We have a responsibility to be custodians of this ancient land. This so-called development brings nothing positive for this area, quite the opposite

Finally, I would also ask the Scottish Ministers to consider: Scotland is being plundered and despoiled by non Scottish profiteers. As our elected representatives you have a duty of care to defend us against such atrocities

1.1.83 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 610
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, as detailed in applications 00012385 and 00012386. The former seeks consent under section 36 of the Electricity Act 1989, while the latter pertains to a marine licence under Part 4 of the Marine (Scotland) Act 2010. Both applications have been lodged by MachairWind Limited, trading as ScottishPower Renewables. I request that this objection be officially recorded and that I receive notification of the final determinations regarding these applications.

The development under consideration involves the establishment of an offshore wind farm with an anticipated generating capacity of approximately 2 gigawatts. The project envisages between 91 and 144 turbines, each with a maximum blade tip height of 335 metres. These turbines would be 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. The site lies approximately 21 kilometres from Iona and is proximate to various islands and coastal settlements within the southern Hebrides, thereby raising significant locational considerations.

This objection is founded upon a detailed examination of the planning and environmental implications of the proposed development, evaluated against the statutory and policy frameworks governing such applications. It is incumbent upon the applicant to provide robust and comprehensive evidence demonstrating compliance with all relevant criteria and planning tests. The responsibility does not lie with objectors to disprove the application’s merits. Having reviewed the submitted material, it is evident that the applicant has failed to meet this evidential burden. Consequently, the proposal does not satisfy the necessary statutory and policy requirements and ought to be refused consent.

1.1.84 Legislative and Policy Framework

The marine licence application under consideration fails to demonstrate compliance with the statutory requirements set out in Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland’s National Marine Plan. The application does not adequately address the General Policies critical to the assessment, including GEN 4 on Co-existence, GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 and paragraph 4.85 on Cumulative Impacts. The absence of clear evidence demonstrating conformity with these policies constitutes a fundamental deficiency in the application’s statutory assessment. Without such demonstration, the application cannot be considered to have met the legal threshold required for authorisation under the Marine (Scotland) Act 2010.

Furthermore, the evidence submitted reveals significant omissions and conflicts with the applicable legal and policy framework. The failure to provide sound evidence as required by GEN 19 undermines the credibility and reliability of the environmental and heritage assessments. The lack of adequate engagement as mandated by GEN

18 further compromises the procedural integrity of the application. Additionally, the application does not satisfactorily address cumulative impacts as required by GEN 21, nor does it ensure the protection of the historic environment, landscape, and natural heritage in accordance with the relevant policies. These shortcomings are not minor procedural errors but substantive failures that weigh decisively against the granting of consent. In light of these unresolved deficiencies and the absence of compliance with the National Marine Plan policies, the marine licence application should be refused.

The 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 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.

1.1.85 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 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. 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.

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

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

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

The practical consequence of the deficiencies identified in the landscape assessment is that the heritage impact conclusions drawn from it lack credibility.

Since the heritage conclusions are explicitly dependent on the landscape assessment, any understatement of landscape effects directly translates into an understatement of heritage effects. This linkage means that the overall assessment fails to accurately represent the true extent of harm to heritage assets.

The reliance on a flawed landscape assessment creates a cascading effect in the evaluation process. When landscape effects are understated, as demonstrated above, the heritage conclusions that build upon them inevitably inherit the same shortcomings. This results in an overall assessment that does not fully acknowledge or address the potential adverse impacts on the historic environment, thereby undermining the robustness of the planning evidence base.

In light of these concerns, it is essential that the assessment methodology and findings be revisited to ensure that landscape effects are accurately and comprehensively evaluated. Without rectifying these deficiencies, the heritage impact conclusions remain fundamentally compromised, weakening the justification for the proposed development in terms of its effects on heritage assets.

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.

1.1.87 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 applicant's own consultants acknowledged that habitability represented a potentially significant pathway through which the proposal could impact island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 focuses primarily on regional-level analysis, providing detailed examination of potential port communities but omitting an equivalent place-based evaluation of the island communities directly facing the development. Notably,

the assessment concludes that these island communities exhibit low sensitivity to tourism effects, a finding reached without targeted analysis of the unique circumstances of those islands.

It is important to recognise that small island economies cannot be accurately represented by regional averages. Such economies are typically concentrated in sectors that are highly susceptible to changes in the attributes attracting visitors. Rather than diminishing sensitivity, dependence on increasing visitor numbers intensifies reliance on the environmental and social qualities that may be jeopardised by the proposal. Therefore, the conclusion of low sensitivity drawn without a place-specific assessment lacks evidential support and should be regarded as an unsubstantiated assumption.

Given these considerations, the socio-economic assessment's methodology falls short of providing a robust understanding of the potential impacts on island communities. A more nuanced, place-based approach is necessary to adequately capture the vulnerabilities and dependencies of these communities, thereby informing effective mitigation measures. Without such an approach, the assessment risks underestimating the true socio-economic consequences of the proposal for the affected island populations.

The proposal fails to 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.

1.1.88 Ecology, Biodiversity and Habitats Regulations

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

The proposed development would entail construction, operation, and decommissioning activities at a very large scale, persisting for decades. Such

prolonged and extensive disturbance within this environmentally significant setting presents a substantial potential for significant adverse effects on the protected species and habitats present.

The practical consequence of the applicant's submission 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.

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

There remains significant uncertainty 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.

1.1.89 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 as presented relies fundamentally on the conclusions drawn within the broader Environmental Impact Assessment. According to the evidence, where the initial assessments concerning landscape, heritage, and socio-economic factors have understated the effects, this underestimation propagates through to the cumulative assessment. Consequently, the baseline from which cumulative impacts are measured is already diminished, leading to an inaccurate foundation for further evaluation.

Because the cumulative assessment builds upon this flawed baseline, the combined effects of the proposed development alongside other existing, consented, and foreseeable projects are similarly understated. This reliance on reduced initial assessments results in a cumulative impact evaluation that fails to capture the true scale of potential adverse effects. Therefore, the assessment cannot be considered reliable or comprehensive in its current form.

The applicant 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.

1.1.90 Public Engagement, Site Selection and Environmental Information

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

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

The Environmental Impact Assessment submitted fails to provide sufficient information to enable the Scottish Ministers to reach a fully informed decision. Although it is comprehensive in scope, the assessment falls short in addressing key potential significant effects with adequate rigour. For instance, the landscape assessment relies on a distance-based pattern that is not supported by its own methodology, while the heritage assessment lacks clear evidence of applying its stated integrity test. Additionally, the socio-economic assessment omits a focused place-based analysis of the affected islands, undermining its relevance. Crucially, the application defers consideration of certain impacts to future post-consent plans, monitoring, and additional approvals, yet the EIA Regulations require that likely

significant effects be clearly understood prior to determination. It is therefore imperative that decisions are made on the basis of the evidence presently before the Scottish Ministers, not on assumptions that outstanding issues will be satisfactorily resolved later. The applicant has not demonstrated that the environmental information provided meets this essential standard.

1.1.91 Effects on Local Area

The applicant's environmental and heritage impact assessment fails to adequately address the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. This underassessment has practical consequences, as it undermines the reliability of the evaluation upon which planning decisions must be based. Despite Islay and Colonsay being the closest inhabited islands to the development area—which lies immediately north-west of Islay and west of Colonsay—the application primarily considers Islay only as a potential project location. It neglects to assess Islay as an affected island community in its own right. Notably, Islay's Atlantic-facing communities are situated nearest to the edge of a 448 square kilometre development area, yet no place-based assessment has been undertaken to evaluate how the development might affect their setting, local economy, or community life.

The omission is equally apparent with respect to Colonsay and Oronsay, where the seaward outlook forms a defining feature of daily life and faces the proposed development directly. The North Colonsay and Western Cliffs Special Protection Area, which forms part of Colonsay's own coastline, is central to the applicant's derogation case and compensation plan. This area represents the clearest acknowledgment within the application that harm to the internationally protected seabird population inhabiting these cliffs cannot be ruled out. Such acknowledgement further highlights the need for a thorough, place-specific assessment of the potential impacts on Colonsay's natural environment, which the current submission does not provide.

Moreover, Oronsay Priory, a scheduled monument of national importance, lies within this community's area and benefits from statutory protection. The heritage assessment's identified gaps apply fully to the evaluation of the monument's open maritime setting, which remains insufficiently considered. The failure to robustly assess the effects on this nationally significant heritage asset, alongside the broader community and environmental concerns for Islay, Colonsay, and Oronsay, calls into question the completeness and credibility of the overall impact evaluation presented by the applicant. Without rectifying these deficiencies, the application cannot be regarded as adequately addressing the interests of these island communities or the protection of their valued heritage and environment.

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 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 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 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 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.

1.1.92 Further Comments

No benefit to the local people.
No benefit to the seascape.
No benefit to marine Life - minke whales, dolhins, porpoise, john coe & aquarius will be put off the area, especially during the construction phase.
No benefit to the people of scotland as a whole.
No benefit to our spiralling electricity bills.

1.1.93 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 611
Dear Sir/Madam,

I hereby submit a formal objection to the proposed MachairWind Offshore Wind Farm project, which is subject to application reference numbers 00012385, seeking consent under section 36 of the Electricity Act 1989, and 00012386, an application for a marine licence under Part 4 of the Marine (Scotland) Act 2010. These applications have been lodged by MachairWind Limited, a subsidiary of ScottishPower Renewables. I request that this objection be officially recorded, that I am listed as an objector, and that I receive notification of the outcome of these applications.

The proposals envisage the development of an offshore wind farm with a generating capacity of approximately 2 gigawatts. The scheme comprises between 91 and 144 wind turbines, each with a maximum height of up to 335 metres to blade tip. The wind farm would be situated within a designated Windfarm Development Area extending over some 448 square kilometres of marine space. This area lies to the north-west of the island of Islay and to the west of Colonsay, approximately 21 kilometres from Iona, and lies in close proximity to various islands and coastal settlements within the southern Hebrides.

The following sections of this document articulate the grounds for objection based upon planning and environmental considerations, framed within the statutory and policy context that governs these applications. It is important to emphasise that the onus lies squarely with the applicant to provide sufficient evidence demonstrating that all relevant statutory tests and policy requirements are met. Objectors are not obliged to prove the contrary. In this instance, the evidence submitted by MachairWind Limited fails to satisfy the necessary criteria, and consequently, planning consent and the marine licence should be refused.

1.1.94 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 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 introduction of aviation and navigation lighting across a currently unlit sea horizon would permanently alter the character of the night-time seascape for the 35-year operational life of the development. This change is not merely temporary; consenting to the proposal effectively signifies that the seascape is considered appropriate for wind farm use, establishing a policy precedent beyond the lifespan of the project. Such a shift in seascape character must be carefully weighed against the visual and environmental values identified in relevant policies, recognising that the harm extends throughout the operational period and influences future decisions regarding this coastal area.

The proposal'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.

1.1.95 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 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.

1.1.96 Effects on Island Communities, Tourism and the Local Economy

The applicant's own baseline evidence confirms that the island communities affected by the proposed development rely exceptionally heavily on visitors who are drawn by specific qualities: landscape, seascape, cultural heritage, tranquillity and remoteness. These attributes are integral to the islands' appeal and underpin their visitor economy. Any alteration or degradation of these qualities would directly undermine the economic foundations of these communities. This, in turn, threatens the provision of local services, the retention of population, and ultimately the long-term viability of the islands as sustainable communities. The proposal thus poses a significant risk to the fundamental economic and social sustainability of the island communities by impacting the very characteristics that sustain their visitor-dependent economies.

The practical consequence of the applicant's flawed socio-economic assessment 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 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.

1.1.97 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 submission of a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan by the applicant has a direct and practical consequence for the assessment of this proposal. These documents acknowledge that adverse effects on the integrity of the North Colonsay and Western Cliffs Special Protection Area cannot be ruled out at this stage. The applicant’s decision to prepare and submit such evidence indicates an understanding that the project may impact the protected guillemot population, necessitating consideration under derogation provisions to allow for potential disturbance or loss.

Analytically, the presence of these documents as part of the application is significant in itself. They demonstrate that the applicant recognises the sensitivity of the designated site and is seeking to address potential impacts through compensatory measures. However, the applicant’s own approach concedes that Scottish Ministers might ultimately reach a different conclusion regarding the likelihood or extent of adverse effects. This acknowledgement highlights the need for careful scrutiny of the derogation and compensation proposals to ensure that any harm to the protected features is adequately mitigated, in accordance with relevant policy and statutory requirements.

Consent for developments 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 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.

1.1.98 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 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.

1.1.99 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 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 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 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 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 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 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.

1.1.100 Personal Observations

Finally, I would also ask the Scottish Ministers to consider: I am a Scot living overseas with no direct link to these islands and yet my objections are strong and valid. How is it that this making decisions based in Scotland cannot see the devastating effects that this project will have. Such a perfect example of short sighted profit over people with no consideration for the environment and the community.

1.1.101 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 coastal communities and their heritage. However, independent scrutiny of the applicant’s documentation reveals that these effects have been understated, and that an essential heritage assessment has not been conducted. Furthermore, while the detrimental impacts on the island communities have been identified, no formal assessment of these effects has taken place. Additionally, the ecological tests mandated by policy remain unproven as achievable. It is also notable that the application before the Scottish Ministers represents only a portion of the entire project.

Given these substantial 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 approval, it is requested that they require the submission of further environmental information alongside enhanced visualisations. Moreover, determination of the applications should 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 requested that the Ministers provide explicit conclusions within their decision, 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 612
Dear Sir/Madam,

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

I request that this letter be registered as a formal objection and that I am notified of the final decision regarding these applications. The grounds for my objection are rooted in both planning and environmental considerations, which I outline below with reference to the statutory and policy framework applicable to the determination of these proposals.

It is important to emphasise that the statutory responsibility to demonstrate compliance with the relevant planning and environmental tests rests entirely with the applicant. Adequate and compelling evidence must be provided by MachairWind Limited to satisfy these requirements. Objectors, including myself, are not obliged to prove the contrary. Upon careful assessment, the applicant has failed to discharge this burden. Consequently, for the reasons articulated in the following sections, the applications do not meet the necessary tests, and consent ought to be refused.

1.1.102 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.

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.

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.

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.

1.1.103 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.

While the applicant's assessment acknowledges certain mitigation measures, it remains insufficient in addressing the broader cultural landscape and experiential qualities integral to the heritage assets. The baseline evidence itself recognises that the cultural significance derives not merely from isolated features but from dynamic qualities such as pilgrimage routes, arrival by sea, movement through a living cultural landscape, and the interrelationships between monuments, spirituality, and their surrounding landscape and seascape. These attributes are experienced primarily through movement rather than fixed viewpoints, underscoring the need for a more comprehensive approach to impact assessment. Furthermore, Historic Environment Scotland's consultation responses, as recorded within the application, explicitly request additional viewpoints to ensure these wider qualities are properly captured and represented. Consequently, the applicant's current assessment falls short of fully reflecting the cultural significance and experiential baseline, thereby limiting the effectiveness of proposed mitigation and the robustness of heritage impact evaluation.

The practical consequence of the deficiencies identified in the landscape assessment is that the heritage impact conclusions, 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 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.

1.1.104 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development rely to an exceptional degree on visitors, who are drawn specifically by the qualities identified in the applicant’s own baseline assessments: landscape, seascape, cultural heritage, tranquillity and remoteness. These attributes form the fundamental appeal that sustains visitor numbers and underpin the local economy.

Any alteration to these defining characteristics would directly undermine the economic foundation of these communities. Such an impact would inevitably extend beyond immediate economic effects, threatening local services, reducing population stability, and ultimately jeopardising the long-term viability of the island settlements. Consequently, the proposal poses a significant risk to the fundamental economic and social sustainability of these island communities.

The applicant’s own consultants acknowledge that habitability 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.

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.

1.1.105 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 targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are characteristically prepared in circumstances where an adverse effect on the integrity of the protected site cannot be definitively excluded. The

inclusion of these submissions is a notable aspect of the application, as it acknowledges the potential for significant impacts on protected habitats. Importantly, the applicant's approach indicates that Scottish Ministers may ultimately reach a different conclusion regarding the presence or extent of any adverse effects. These documents are therefore intended to address and mitigate potential impacts under derogation provisions, demonstrating the applicant's recognition of ecological sensitivities and the need for compensatory measures.

The 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 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.

1.1.106 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 as presented relies fundamentally on the conclusions drawn within the broader Environmental Impact Assessment. According to the evidence, where the initial assessments concerning landscape, heritage, and socio-economic factors have understated the effects, this underestimation propagates through to the cumulative assessment. Consequently, the baseline from which cumulative impacts are measured is already diminished, leading to an inaccurate foundation for further evaluation.

Because the cumulative assessment builds upon this flawed baseline, the combined effects of the proposed development alongside other existing, consented, and foreseeable projects are similarly understated. This reliance on reduced initial assessments results in a cumulative impact evaluation that fails to capture the true scale of potential adverse effects. Therefore, the assessment cannot be considered reliable or comprehensive in its current form.

The applicant's 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.

1.1.107 Public Engagement, Site Selection and Environmental Information

The deficiencies in public participation and consultation timing significantly undermine the credibility of the site-selection process and cannot be mitigated by any subsequent procedural measures. The applicant requests that Scottish Ministers place substantial weight on the site-selection process; however, the quality of public involvement throughout both the plan and site-selection stages has been inadequate and has persisted into the application phase. The application itself comprises thousands of pages of technical documentation, presented during the busiest months for island communities, when residents are engaged continuously in the visitor season and access to specialist advice is severely limited. This imbalance is particularly stark given the applicant's years of preparation and substantial professional and financial resources. National Marine Plan policy GEN 18 and the Aarhus Convention principles mandate that those affected must have a genuine and realistic opportunity to participate in decisions of such magnitude. The conditions imposed on the local communities fall short of this standard, and Scottish Ministers should give this serious consideration when evaluating the representations submitted.

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.

1.1.108 Effects on Local Area

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

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

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

The applicant's assessment 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 notably relies on distance-based mitigation in addressing the visual impacts on Mull and Ross of Mull coastal communities and landscapes, yet this approach inadequately reflects the true extent of significant effects experienced locally. For instance, although the Ross of Mull South coastal area is acknowledged as having High sensitivity at distances of approximately 22 to 24 kilometres and is attributed Medium magnitude effects, the applicant concedes significant impacts at Erraid, on the Core Paths of the Ross, and at Fionnphort—the key gateway to Iona and the principal embarkation point for visitors. This community is intrinsically linked to visitor flows, yet the assessment does not extend to a place-based evaluation of its social and economic vulnerabilities. Similarly, across Mull, significant effects are accepted on Core Paths and within the Central, South and West Mull Local Landscape Area, and the Loch na Keal National Scenic Area, which is of High sensitivity between 21 and 33 kilometres, is nonetheless attributed no more than Medium magnitude. The applicant's characterisation of the Wilderness and Gribun Rocks area, where the scale of change is deemed small due to viewing distances exceeding 30 kilometres, further exemplifies an over-reliance on distance as a mitigating factor rather than a nuanced, site-specific analysis.

This distance-centric assessment framework fails to capture the profound implications for Mull's west-facing tourism economy, which is heavily reliant on the unspoiled Atlantic seascape that the proposed development would fundamentally industrialise. The wildlife boat operations and accommodation sectors supporting the western townships are intimately connected to this landscape quality, yet no dedicated place-based assessments have been conducted for these communities. The absence of such evaluations undermines the understanding of the cumulative and localized economic and community impacts that would arise. In summary, the applicant's assessment inadequately accounts for the significance of visual, economic, and community effects on highly sensitive landscapes and tourism-dependent populations, thereby failing to provide a comprehensive or balanced appraisal of the proposal's true consequences for Mull and Ross of Mull.

The applicant's assessment fails to fully 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 assigns the South Tiree coastal area a High sensitivity rating at an approximate distance of 35 kilometres while attributing a Low magnitude of change. This evaluation significantly understates the true extent of impact on Tiree's distinctive landscape character. Tiree is an exceptionally low-lying island, with its entire landscape defined by the dominance of sea and sky. Its highest point, Ben Hynish, reaches only 141 metres, and the island's character relies heavily on an open oceanic horizon. Introducing turbines up to 335 metres in height would present vertical structures unprecedented in the seascape. Given this exposure and sensitivity, the conclusion of a Low magnitude of change fails to capture the substantial visual and character effects, leading to an unreliable overall assessment of impact on this receptor.

The applicant's assessment fails to consider significant effects on mainland and island communities that have direct 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 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.

1.1.109 Personal Observations

In addition to the planning matters above, I am personally concerned because: I believe these projects are devastating my country for the profits of multi national companies.

1.1.110 Summary

The proposal put forward by the applicant fails to meet the requirements set by the relevant statutory and policy framework governing its determination. Notably, the applicant's own evaluations acknowledge substantial impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal region. Independent reviews of the applicant's documentation reveal that the extent of these impacts has been underestimated. Additionally, a comprehensive heritage assessment, as mandated, has not been undertaken. While the adverse effects on the island communities directly affected by the development were identified, no formal assessment of these impacts has been conducted. Furthermore, the ecological criteria necessary for approval have not been demonstrated to be achievable. Compounding these concerns is the fact that only a portion of the proposed project has been submitted for consideration by the Scottish Ministers.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm proposal, as well as to decline the associated marine licence application.

Should the Ministers be inclined to grant consent, I request that additional environmental information be provided alongside enhanced visual representations. Moreover, I propose that the determination of these applications be deferred until a public inquiry has been convened, allowing for a thorough examination of all issues raised in this objection. Regardless of the final decision, I also implore the Ministers to include clear conclusions in their reasoning with respect to the impacts on cultural heritage and the island communities affected by the development.

Yours faithfully,

[Redacted]

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

Member of the public 613
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.

1.1.111 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, thereby conflicting with key provisions of the National Planning Framework 4 (NPF4). Specifically, it would fail to uphold Policy 11 alongside Policy 4(c) and 4(d), which are designed to protect National Scenic Areas and other nationally important landscapes from impacts that would diminish the qualities for which they are recognised.

Furthermore, the application has not demonstrated that it would preserve the cultural significance of scheduled monuments and their settings, as required by Policy 7, including Policy 7(h) on scheduled monuments and Policies 7(c) and 7(d) concerning their settings. In addition, there is an absence of evidence showing that island communities would be safeguarded, further undermining compliance with these heritage protection policies.

Lastly, the ecological assessments submitted fail to meet the necessary tests set out in Policy 3 on biodiversity. Taken together, these shortcomings establish that the proposal does not comply with multiple NPF4 policies aimed at protecting nationally important landscapes, heritage assets, and biodiversity. Consequently, the proposal should be refused planning permission.

1.1.112 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.

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

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

Moreover, the absence of demonstrated compliance with these important policies indicates a fundamental shortcoming in the application. Without clear evidence that the proposal meets the criteria set out for protecting nationally important landscapes and seascapes, the planning authority cannot reasonably be expected to grant

consent. In light of this, the proposal should be refused to uphold the integrity of the planning system and to ensure that landscape and seascape interests are adequately protected.

1.1.113 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 baseline assessment recognises that the cultural significance of the heritage assets in question arises not merely from isolated features but from a broader experiential context. This includes elements such as pilgrimage routes, arrival by sea, movement through an active cultural landscape, and the interrelationships between monuments, spirituality, and the encompassing landscape and seascape. Crucially, these attributes are experienced dynamically through movement rather than from static viewpoints, highlighting the importance of capturing a sense of journey and lived experience in any heritage impact assessment.

Despite this recognition, Historic Environment Scotland's consultation responses, as recorded within the application documentation, indicate that the assessment has not fully addressed these wider experiential qualities. The request for additional viewpoints underscores a concern that the applicant's evaluation may inadequately represent the cultural landscape's holistic significance. This suggests that without a more comprehensive approach to capturing the dynamic and interconnected nature of the heritage assets, the assessment risks underestimating the true impact on their cultural value.

The 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.

1.1.114 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.

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.

1.1.115 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 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.

1.1.116 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 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.

1.1.117 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 with this application is fundamentally insufficient to enable the Scottish Ministers to reach a fully informed decision. While the assessment covers a range of topics, it falls short of providing a comprehensive and reliable evidential basis. Notably, significant effects identified within the application are either inadequately investigated or assessed using methodologies that lack coherence and rigour. For instance, the landscape assessment produces outcomes based on a distance pattern not supported by its stated methodology; the heritage assessment fails to apply its own integrity test; and the socio-economic assessment omits any place-based analysis of the affected islands. These deficiencies undermine the credibility of the assessment's conclusions.

Furthermore, the application frequently relies on future measures such as post-consent plans, monitoring programmes, and additional approvals to address gaps in the environmental information. However, such reliance is inconsistent with the requirements of the EIA Regulations, which mandate that likely significant effects must be fully understood before determination. The expectation that outstanding matters will be resolved at a later stage does not satisfy the statutory requirement for a complete and sufficient assessment at the time of decision-making.

In light of these considerations, the Scottish Ministers are compelled to determine the application solely on the evidence presently before them. Given that the applicant has not demonstrated the adequacy of the environmental information submitted, the assessment cannot be regarded as sufficient to support approval. It is therefore concluded that the Environmental Impact Assessment is inadequate for the purpose of this decision, and the application should not be granted consent on the basis of the current information.

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

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

The applicant's assessment fails to adequately 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.

1.1.119 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 614
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.

1.1.120 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 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 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 proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018, resulting in a fundamental procedural deficiency. This statutory requirement explicitly obliges decision-makers to ensure that the interests of island communities are given due weight during the planning process. The absence of demonstrated compliance with this duty undermines the integrity of the decision-making framework and contravenes the legal standards set out in the Act.

Furthermore, the evidence before the determining authority reveals clear deficiencies and omissions in addressing the specific needs and circumstances of island communities. Such failures constitute a direct conflict with the applicable legal and policy framework established by the Islands (Scotland) Act 2018. In accordance with established principles, where compliance with statutory duties is not demonstrated, and where material shortcomings are evident, these factors must weigh decisively against the granting of planning consent. Consequently, the proposal should be refused on the grounds that it does not meet the statutory requirements for the proper consideration of island communities.

The applicant bears the responsibility of demonstrating, through robust, objective and proportionate evidence, that every relevant statutory duty, planning policy and environmental assessment requirement has been satisfied. This evidential burden is fundamental to the proper determination of the application and ensures that all legal and policy frameworks are fully complied with before consent is granted. The applicant’s submission must therefore provide clear and comprehensive proof that all applicable obligations have been met without exception.

In this case, the applicant has failed to discharge this burden. The evidence submitted does not demonstrate compliance with all relevant legal and policy requirements, and instead reveals deficiencies, omissions and conflicts with the applicable frameworks. Such failures are material and significant, and in accordance with established principles, these unresolved matters weigh decisively against the granting of consent. Without full and satisfactory demonstration of compliance, the application cannot lawfully or properly be approved.

1.1.121 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.

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 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.

1.1.122 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 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.

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'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.

1.1.123 Cultural Landscape, Archaeology and Historic Environment

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

The applicant's baseline assessment recognises that the cultural significance of the heritage assets in question arises not merely from isolated features but from a broader experiential context. This includes elements such as pilgrimage routes, arrival by sea, movement through an active cultural landscape, and the interrelationships between monuments, spirituality, and the encompassing landscape and seascape. Crucially, these attributes are experienced dynamically through

movement rather than from static viewpoints, highlighting the importance of capturing a sense of journey and lived experience in any heritage impact assessment.

Despite this recognition, Historic Environment Scotland's consultation responses, as recorded within the application documentation, indicate that the assessment has not fully addressed these wider experiential qualities. The request for additional viewpoints underscores a concern that the applicant's evaluation may inadequately represent the cultural landscape's holistic significance. This suggests that without a more comprehensive approach to capturing the dynamic and interconnected nature of the heritage assets, the assessment risks underestimating the true impact on their cultural value.

The heritage impact conclusions 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.

1.1.124 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 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 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.

1.1.125 Ecology, Biodiversity and Habitats Regulations

The proposed development presents a significant risk of adverse environmental effects due to its location within an ecologically sensitive area. Priority Marine Features and Annex I habitats are present within the development site itself, indicating a high level of ecological importance. Furthermore, the surrounding waters provide habitat for protected species, including seabirds, marine mammals, and basking sharks. The scale and duration of the proposed construction, operational, and decommissioning activities—extending over several decades—would exert considerable pressure on these vulnerable ecosystems. Given the presence of such valuable marine biodiversity and the potential for substantial disturbance, the development is likely to result in significant environmental harm. It is therefore imperative that this ecological sensitivity is fully recognised and appropriately addressed in any planning decisions.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan, specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. 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 practical consequence of the stringent legal and policy framework under the Habitats Regulations is that planning consent for developments affecting protected habitats and species can only be granted when it is clearly demonstrated that the proposal will not adversely affect the integrity of the protected site. This requirement imposes a high evidential standard: no reasonable scientific doubt can remain regarding the absence of adverse effects. It is not sufficient for an applicant to rely solely on mitigation, compensation proposals, or commitments to future monitoring as these do not, by themselves, satisfy the statutory tests necessary to lawfully grant consent.

This legal framework is reinforced by relevant policy provisions, including GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). Together, these provisions ensure that developments are subject to rigorous assessment and that consent decisions are made only when the strict derogation tests are conclusively met. Consequently, the burden of proof lies firmly with the applicant to provide robust, scientific evidence that the proposed development will not compromise the protected habitat's integrity before any consent can be lawfully granted.

The applicant's own derogation documents, 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.

1.1.126 Cumulative and In-Combination Effects

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

principal decision, thereby precluding a holistic appraisal of the project's environmental and operational impacts at the critical initial stage.

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

The practical consequence of relying on flawed baseline assessments is that the cumulative impact assessment is rendered unreliable and systematically underestimates the true combined effects of development proposals. This is because the cumulative assessments are contingent on conclusions drawn elsewhere in the Environmental Impact Assessment. Specifically, where the initial evaluations of landscape, heritage, and socio-economic effects have understated impacts—as detailed previously—the cumulative assessment similarly adopts this diminished baseline. As a result, the aggregate effects of the proposal under consideration, when combined with other existing, consented, and foreseeable developments, are correspondingly understated. This fundamental dependency undermines confidence in the cumulative impact conclusions and suggests that the full extent of combined development effects has not been appropriately accounted for.

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.

1.1.127 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 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.

1.1.128 Effects on Local Area

The applicant's assessment notably lacks a comprehensive evaluation of the effects on Islay and Colonsay communities, particularly when compared to the mitigation measures proposed for other project locations. While the development area spans 448 square kilometres immediately north-west of Islay and west of Colonsay, the application treats Islay primarily as a potential project site rather than as an affected community in its own right. This approach overlooks the proximity of Atlantic-facing communities on Islay, which face the nearest edge of the development area without any detailed, place-based consideration of impacts on their setting, economy, or community life. In contrast, effective mitigation strategies would require such tailored assessments to address the direct and significant influences on local populations.

Moreover, the situation on Colonsay and Oronsay underscores further shortcomings in the assessment. Both islands' seaward outlook, integral to their daily life, directly

faces the project array. The North Colonsay and Western Cliffs Special Protection Area, forming part of Colonsay's coastline, is central to the applicant's derogation case and compensation plan, implicitly acknowledging unavoidable harm to the internationally protected seabird population. Additionally, Oronsay Priory—a scheduled monument of national importance—lies within this community and suffers from an inadequate heritage assessment, particularly concerning the preservation of its open maritime setting. Taken together, these deficiencies undermine the reliability of the environmental and heritage impact evaluation and signal a need for a more robust, community-centred 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 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 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 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 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 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.

1.1.129 Personal Observations

Finally, I would also ask the Scottish Ministers to consider: The sea around Mull and Iona is protected.
There are enough windfarms around Scotland with zero benefit to Scottish people. Our energy bills are enormous!!

1.1.130 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 615
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.

1.1.131 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 would result in significant adverse effects on nationally designated landscapes and seascapes, directly conflicting with established policy safeguards. Policy 11 operates alongside Policies 4(c) and 4(d), which protect National Scenic Areas and other nationally important landscapes by preventing significant harm to

the qualities for which these areas are designated. In this instance, the submitted evidence does not demonstrate that these protections would be upheld, indicating a clear policy breach.

Furthermore, the proposal fails to satisfy key requirements concerning heritage and biodiversity. Policy 7, including provisions relating to scheduled monuments and their settings, mandates the protection of cultural significance, yet the proposal does not provide adequate assurance that these assets would be safeguarded. Similarly, Policy 3's ecological tests have not been shown to be met, and there is an absence of evidence confirming that island communities would be protected. Collectively, these shortcomings signify a failure to comply with the integrated framework of NPF4 policies designed to preserve designated assets.

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.

1.1.132 Seascape, Landscape and Visual Effects

The applicant’s assessment methodology notably lacks a defined distance threshold beyond which major effects are considered to cease, as stated in Appendix 16.1. Nonetheless, an independently prepared Evidence Note, which rigorously analyses the applicant’s Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern across all three assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change. This pattern persists irrespective of the receptor’s intrinsic sensitivity or the extent of its visibility. Such a finding indicates that the methodology implicitly diminishes the potential severity of effects at distances exceeding 20 kilometres, thereby raising significant concerns about the reliability of the predicted impacts upon sensitive receptors at these ranges.

Further scrutiny of the applicant’s own documentation underscores the influence of distance on these judgements. For instance, the assessment of a coastal area situated over 30 kilometres from the development site explicitly states that, given the viewing distance, the scale of change is judged to be small. Moreover, the Landscape Character synthesis delineates a gradation of effect magnitude with distance: High magnitude effects are identified within approximately 20 kilometres, Medium effects between about 20 and 30 kilometres, and Low effects beyond approximately 30 kilometres for certain landscape types. This systematic moderation

of magnitude at distances corresponding to the locations of the most sensitive designated landscapes results in protective tests being applied to understated inputs. Consequently, the conclusions presented do not reliably characterise the effects that the Scottish Ministers are asked to consent, thereby undermining the robustness and credibility of the applicant's assessment methodology.

When considering the 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.

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

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

The proposal fails to 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.

1.1.133 Effects on Island Communities, Tourism and the Local Economy

The proposal poses a direct threat to the fundamental economic and social sustainability of the island communities in question by undermining the very qualities that attract visitors. These communities rely exceptionally heavily on visitors, who are drawn by attributes explicitly identified in the applicant's own baseline assessments: landscape, seascape, cultural heritage, tranquillity, and remoteness. Any alteration to these intrinsic qualities would strike at the core of the islands' economic foundation, which in turn supports essential local services, sustains population levels, and ensures the long-term viability of these communities. Consequently, the proposed development jeopardises the enduring welfare and resilience of the island populations by diminishing the visitor appeal upon which they depend.

The applicant's 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 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.

1.1.134 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 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.

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.

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.

1.1.135 Effects on Local Area

There remains considerable uncertainty regarding the adequacy of the applicant's assessment of direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Although Islay and Colonsay lie closest to the proposed development area, which spans 448 square kilometres immediately north-west of Islay and west of Colonsay, the application primarily considers Islay as a potential project location rather than as an affected island community in its own right. This approach neglects a place-based evaluation of impacts on Islay's Atlantic-facing communities, whose setting, economy, and community life face the nearest edge of the development zone without proper assessment. For Colonsay and Oronsay, the seaward outlook integral to daily life directly confronts the array, and the North Colonsay and Western Cliffs Special Protection Area—part of Colonsay's coastline—is central to the applicant's derogation case and compensation plan. This acknowledges that harm to the internationally protected seabird population on these cliffs cannot be excluded. Moreover, Oronsay Priory, a scheduled monument of national importance within this community, is subject to the same identified gaps in the heritage assessment, particularly regarding its open maritime setting. Taken together, these points demonstrate that the applicant's environmental and heritage impact evaluation lacks the necessary depth and reliability concerning these island communities.

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 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 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.

There remains considerable uncertainty regarding the full extent of the proposed development's effects on mainland and island communities that possess direct views and economic ties to the seascape. Notably, Gigha, a community-owned island celebrated nationally for its regeneration following purchase by its residents, faces the development area from the east. Despite this unique status and the delicately balanced nature of its community and economy, no assessment of the potential impacts upon Gigha has been provided. This omission undermines the comprehensiveness of the applicant's evaluation and raises concerns about the adequacy of the environmental considerations.

Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic vistas along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas represent receptors of a quality precisely relevant to the distance-based moderation approach contested in this objection. Furthermore, the chain of communities along Kintyre's west coast, whose identity and visitor economy are closely linked to the Atlantic seaboard views towards Islay, Jura, and surrounding waters—including the Treshnish Isles and other small islands—have not been accounted for in the assessment. The failure to evaluate the effects on these interconnected communities further compromises the integrity of the applicant's conclusions. In light of these unassessed impacts, the application cannot be supported as it presently stands.

1.1.136 Personal Observations

In addition to the planning matters above, I am personally concerned because: Not able to visit unscathed landscaping

Based on my own local knowledge, I also wish to highlight that: Save the puffins and the beauty of the landscape

1.1.137 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 616
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.

1.1.138 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 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 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 proposal fails to provide the required Environmental Impact Assessment as mandated by The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations. These regulations explicitly require that the likely significant environmental effects of the development be identified, assessed, and reported prior to any determination. Without this essential assessment, the decision-making process is fundamentally compromised.

Furthermore, the proposal does not demonstrate compliance with the Habitats Regulations, which mandate a thorough assessment of the effects on European protected sites in accordance with the applicable statutory tests. The absence of

such an assessment means that the potential impacts on protected habitats remain unexamined and unmitigated, directly contravening statutory requirements.

Given these clear deficiencies and omissions in the environmental and habitats assessments, the proposal conflicts with the relevant legal and policy frameworks. Where compliance has not been demonstrated, these failures must weigh decisively against the granting of consent. Accordingly, the application should be refused on these grounds.

The Islands (Scotland) Act 2018 explicitly requires that the interests of island communities be considered and given due weight during the decision-making process. This statutory obligation is clear and unambiguous in its intent to ensure that island communities are properly represented and their unique circumstances fully accounted for in planning decisions.

In the case of the current proposal, there is a failure to demonstrate compliance with this requirement. The evidence before the determining authority does not show that the interests of island communities have been adequately considered or appropriately weighted. Furthermore, the documentation reveals deficiencies and omissions in addressing these statutory duties, resulting in a conflict with the applicable legal and policy framework established by the Islands (Scotland) Act 2018.

Given these shortcomings, the proposal does not meet the necessary legal standards. Where compliance with the Act has not been demonstrated, and where evidence identifies such deficiencies and conflicts, these matters must weigh against the granting of consent. Therefore, on the basis of the failure to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018, this proposal should be refused.

The applicant has failed to discharge the fundamental responsibility of demonstrating compliance with all relevant legal and policy requirements. It remains uncertain whether the proposal satisfies every statutory duty, planning policy, and environmental assessment obligation, as the evidence submitted is neither robust nor sufficiently objective or proportionate to establish such compliance beyond doubt.

The applicant bears the onus of providing clear and comprehensive evidence that all applicable frameworks have been met. However, the documentation presented contains deficiencies and omissions that undermine confidence in the proposal’s conformity with the legal and policy regime. These shortcomings have not been addressed or remedied, leaving critical gaps in the evidential record.

Where compliance cannot be conclusively demonstrated, or where conflicts with statutory and policy provisions persist, these unresolved issues must weigh decisively against the granting of consent. In this case, the absence of satisfactory evidence confirming adherence to all relevant requirements compels refusal. The applicant’s failure to meet the evidential burden is a fundamental flaw that precludes lawful approval of the development.

1.1.139 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.

While some mitigation measures have been proposed, they fall short when assessed against the requirements of relevant NPF4 policies protecting designated assets. Policy 11 must be read alongside Policy 4(c) and 4(d), which safeguard National Scenic Areas and nationally important landscapes from significant adverse effects on their defining qualities, as well as Policy 7—particularly Policy 7(h) concerning scheduled monuments and Policies 7(c) and 7(d) addressing the setting of historic assets—and Policy 3 on biodiversity. The evidence demonstrates that the proposal would result in significant adverse effects on these nationally designated landscapes and seascapes. Furthermore, it has not been adequately shown that the cultural significance of scheduled monuments and their settings would be preserved, nor that island communities would be effectively protected. Crucially, the ecological criteria set out in Policy 3 have not been proven capable of being met based on the submitted evidence. In summary, the proposal fails to comply with multiple interrelated NPF4 policies designed to safeguard nationally important landscapes, heritage assets, and biodiversity.

The proposal fails to provide mitigation measures sufficient to overcome the adverse effects identified in the terrestrial development plan, including the Argyll and Bute Local Development Plan 2. The same conflicts persist, notably the detrimental impact on landscape, heritage, and community interests that these policies seek to safeguard. As a result, the proposal is inconsistent with the relevant development plan framework and National Planning Framework 4 in its entirety, a position the applicant has not successfully contested.

1.1.140 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.

While mitigation measures may seek to minimise the visual impact of the proposed development, the introduction of aviation and navigation lighting represents an unavoidable change to the night-time seascape character. Currently, the sea horizon is unlit, and the permanent addition of such lighting over the 35-year operational period would fundamentally alter this aspect of the seascape. It is important to note that the operational lifespan does not confine the extent of harm in planning terms; consenting to the development effectively signifies acceptance that this seascape is appropriate for wind farm use. Therefore, despite potential mitigations, the development would result in a lasting and significant transformation of the night-time seascape character.

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

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

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

1.1.141 Cultural Landscape, Archaeology and Historic Environment

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 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.

1.1.142 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development rely heavily on visitors, who are drawn specifically by the qualities identified in the applicant's own baseline assessments: landscape, seascape, cultural heritage, tranquillity, and remoteness. These attributes are not merely incidental; they constitute the core appeal that sustains the visitor economy upon which these communities depend to an exceptional degree.

Any alterations to these fundamental qualities would therefore have a direct and detrimental impact on the economic foundation of the island communities. Such an impact would extend beyond economics, threatening local services, population stability, and ultimately the long-term viability of these communities. The proposal, by undermining the very characteristics that attract visitors, poses a significant risk to the social and economic sustainability of the islands.

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

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

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

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

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

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

The applicant evidence establishes that under the Habitats Regulations, consent for developments impacting protected habitats and species may only be granted where the competent authority is satisfied that the proposal will not adversely affect the integrity of the protected site, except where the stringent derogation tests are met. This legal framework requires that no reasonable scientific doubt remains regarding the absence of adverse effects. The onus lies firmly with the applicant to demonstrate compliance; reliance solely on mitigation, compensation measures, or future monitoring does not suffice to meet the statutory requirements.

This rigorous evidential standard is reinforced through the engagement of the Habitats Regulations alongside GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of NPF4. Together, these provisions form a comprehensive policy framework that mandates a high threshold of proof before consent can be lawfully granted. Consequently, any planning decision must ensure that the statutory tests are fully satisfied in order to uphold the integrity of protected sites and comply with prevailing legal and policy obligations.

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.

1.1.144 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 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 assessment identifies a clear failure to comply with established policy and regulatory requirements concerning project splitting and the evaluation of cumulative effects. Specifically, the applicant has not satisfactorily demonstrated that the cumulative and in-combination impacts of the proposal, nor the effects of the project in its entirety, have been reliably identified and assessed. This shortfall engages provisions 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 and the Environmental Impact Assessment Regulations.

This omission is significant because it undermines the integrity of the environmental assessment process and the policy framework designed to ensure comprehensive consideration of all relevant effects. Without a clear and thorough appraisal of deferred works and their potential interactions with the proposed development, the decision-making process is compromised. The absence of explicit treatment of these elements means that the proposal cannot be considered fully compliant with the requirements intended to prevent project splitting and to address cumulative effects adequately.

In light of these findings, it is essential that the determination explicitly addresses the treatment of deferred works and ensures a rigorous assessment of the project as a whole. Only through such comprehensive consideration can the planning authority fulfil its statutory obligations and uphold the principles of sustainable development enshrined in national policy and legislation. Consequently, the application should not be approved until these deficiencies are satisfactorily remedied.

1.1.145 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.

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

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

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

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

The applicant's assessment does not address the potential effects on several mainland and island communities that have direct views of the proposed development and possess a strong economic reliance on the seascape. Notably, Gigha, a community-owned island renowned nationally for its regeneration after purchase by its residents, faces the development waters from the east; yet the assessment omits any examination of the impact on its delicate community balance

and local economy. This omission raises questions about the comprehensiveness of the evaluation regarding the social and economic dimensions of the proposal.

Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers expansive panoramic views along the Hebridean coast that attract visitors throughout the peninsula. These seaward vistas are precisely the type of receptor that the applicant's distance-based moderation approach—criticised in this objection—seeks to downplay. The significance of these views to local tourism and community identity warrants a more thorough and site-specific consideration than has been provided.

Furthermore, the west coast of Kintyre comprises a series of communities whose character and visitor economy are intimately connected to the open Atlantic seaboard facing Islay, Jura, and adjacent waters. The Treshnish Isles and surrounding smaller islands, alongside mainland coasts with outlooks towards the development site, share this sensitive position. The failure to assess the potential effects on these interconnected seascape receptors undermines the robustness of the overall landscape and socio-economic impact appraisal. In light of these gaps, a more comprehensive and inclusive assessment is essential to fully understand the proposal's implications for the wider coastal and island communities.

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

Consequently, the effect on populations living beyond this arbitrary threshold remains insufficiently evaluated. These communities, which bear the consequences of the development, have received no place-based assessment to reflect their specific circumstances and sensitivities. This omission undermines the thoroughness and accuracy expected in a robust environmental impact assessment.

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

1.1.147 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 617
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.

1.1.148 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 Scottish Ministers, in determining this application, are similarly bound to have regard to these statutory duties.

The evidence submitted with the application fails to demonstrate that these statutory requirements have been adequately addressed. There are clear deficiencies and omissions in the assessment of the proposal’s impact on the protected interests identified in Schedule 9. The absence of comprehensive mitigation measures and the lack of robust evidence to confirm that reasonable steps have been taken to avoid or reduce harm to natural beauty and heritage assets undermine the application’s compliance with the legal framework.

Given these unresolved uncertainties and the failure to demonstrate adherence to the statutory duties under Schedule 9, the application does not meet the necessary legal and policy standards. Where such compliance is not evidenced, the statutory framework dictates that these shortcomings must weigh against the granting of consent. Accordingly, the application should not be approved in its current form.

The marine licence application fails to comply with the statutory requirements of the Marine (Scotland) Act 2010 and the relevant policies of Scotland's National Marine Plan. Under Part 4 of the Marine (Scotland) Act 2010, authorisation decisions must be made in accordance with the National Marine Plan unless relevant considerations indicate otherwise. This application does not demonstrate compliance with key General Policies including GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts). The absence of demonstrated compliance and the presence of deficiencies and omissions in the evidence directly conflict with the applicable legal and policy framework. As such, these failures weigh decisively against the granting of consent for the marine licence.

The applicant's submission acknowledges that National Planning Framework 4 (NPF4) is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. The proposal engages several key policies within NPF4, specifically Policy 3 concerning Biodiversity, Policy 4 relating to Natural Places, Policy 7 addressing Historic Assets and Places, and Policy 11 on Energy. These policies establish clear expectations for the protection and enhancement of biodiversity, the safeguarding of natural environments, the conservation of historic assets, and the responsible use of energy resources within development proposals.

However, the evidence presented fails to demonstrate compliance with these critical policies. There are identifiable deficiencies and omissions in the applicant's documentation that undermine the ability to confirm adherence to the biodiversity and natural places requirements set out in Policies 3 and 4. Similarly, the proposal does not adequately address the protection and management of historic assets as required by Policy 7, nor does it provide sufficient evidence to satisfy the energy considerations mandated by Policy 11. These shortcomings represent clear conflicts with the applicable legal and policy framework established by NPF4.

Given that compliance with these policies has not been demonstrated, and in light of the identified deficiencies and omissions, these matters weigh decisively against the granting of planning consent. The failure to meet the statutory and policy requirements of NPF4 in relation to biodiversity, natural places, historic assets, and energy is a material planning consideration that must be afforded significant weight in the determination of this application. Consequently, the proposal should be refused on the basis that it conflicts with the fundamental provisions of the National Planning Framework 4.

The 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 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 by the current application, which lacks any demonstrable evidence that these interests have been adequately assessed or integrated into the planning evaluation.

Furthermore, the absence of compliance with this legal requirement constitutes a significant omission that conflicts with the applicable legal and policy framework. As established, where such deficiencies or omissions are identified, they must weigh against the granting of consent. Therefore, the failure to properly address the statutory duties under the Islands (Scotland) Act 2018 provides a clear and compelling basis for objection to this proposal.

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 to meet the evidential burden is a fundamental deficiency that undermines the validity of the application. Without clear and comprehensive proof that all legal and policy frameworks have been satisfied, the application cannot be considered compliant with the necessary statutory and planning obligations.

Furthermore, the evidence submitted contains significant omissions and deficiencies that directly conflict with the applicable legal and policy framework. These unresolved issues are not minor procedural errors but substantive failures that weigh heavily against the granting of consent. The absence of demonstrable compliance means that the application does not meet the threshold required by law and policy, and therefore cannot be approved in its current form.

In conclusion, the applicant's inability to demonstrate full compliance with all statutory duties and planning policies, as required by the evidential burden, constitutes a clear and decisive reason to refuse consent. The presence of unresolved deficiencies and conflicts with the legal and policy framework mandates that the application be rejected to uphold the integrity of the planning system.

1.1.149 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.

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 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.

1.1.150 Seascape, Landscape and Visual Effects

The practical consequence of the applicant's assessment methodology is that it underestimates the magnitude of effects on highly sensitive receptors located beyond approximately 20 kilometres from the development area. Despite the absence of any explicit distance threshold in the applicant's written methodology in Appendix 16.1, an independent Evidence Note, based entirely on the applicant's own Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern: no highly sensitive receptor beyond this distance is attributed the highest magnitude of change, regardless of its sensitivity or the extent of visibility.

This implicit reliance on distance is further demonstrated within the applicant's own documents. For example, the assessment of a coastal area situated over 30 kilometres away concludes that the scale of change is small due to the viewing distance. Additionally, the Landscape Character synthesis categorises magnitude as High within roughly 20 kilometres, Medium between about 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. Such gradations, while not explicitly stated as thresholds, effectively moderate the assessment outcomes based on distance.

The consequence of this approach is that protective tests for sensitive designated landscapes, which often lie at or beyond these critical distances, are applied to understated inputs. This systematic moderation of magnitude at key distances undermines the reliability of the conclusions drawn. As a result, the effects described do not provide an accurate or dependable basis for the Scottish Ministers to grant consent for the proposed development.

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

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

1.1.151 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 arises from a range of experiential qualities, including pilgrimage, arrival by sea, and movement through a living cultural landscape. This significance is rooted in the relationships between monuments, spirituality, and the surrounding landscape and seascape, which are primarily experienced through movement rather than from fixed viewpoints. Despite this recognition, Historic Environment Scotland's consultation responses, as recorded in the application, highlight the need for additional viewpoints to ensure these broader cultural and experiential qualities are adequately represented. This suggests that the applicant's assessment may not fully capture the extent of the heritage impacts when considering the wider cultural landscape and its dynamic qualities. It is therefore important that any evaluation of heritage effects gives proper weight to these aspects to avoid underestimating potential impacts on cultural significance.

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

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

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

The application fails to demonstrate compliance with 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.

1.1.152 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 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.

1.1.153 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 has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically targeting the guillemot

population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are customarily prepared in circumstances where the possibility of an adverse effect on the integrity of a protected site cannot be definitively ruled out. Their inclusion in this application is therefore a noteworthy aspect, as it indicates the applicant's acknowledgment of potential impacts. Moreover, the applicant's own position implies that Scottish Ministers may ultimately reach a different conclusion regarding the presence or extent of any adverse effects. In light of this, the submission of these derogation and compensation documents reflects a recognition of the need to address and mitigate possible harm to protected species and sites under the relevant statutory provisions.

The legal framework governing developments affecting protected habitats 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 satisfy the statutory tests is that the protection of internationally important habitats and species cannot be assured, which fundamentally undermines the justification for granting consent. Without clear demonstration that these legal requirements are met, the risk of harm to designated ecological features remains unacceptably high.

The evidence submitted, including the applicant's own derogation documents, reveals significant uncertainty regarding compliance with the necessary statutory criteria. This uncertainty indicates that the applicant has not provided sufficient assurance that the proposed development will avoid adverse impacts on protected habitats and species of international importance.

Given the applicant's inability to meet the statutory tests, it is clear that the application does not fulfil the legal obligations designed to safeguard critical ecological assets. Consequently, the case for granting consent is not made, and the application should be refused to ensure the continued protection of these internationally significant environmental features.

1.1.154 Cumulative and In-Combination Effects

The cumulative impact assessment as presented relies fundamentally on the conclusions drawn within the broader Environmental Impact Assessment. According to the evidence, where the initial assessments concerning landscape, heritage, and socio-economic factors have understated the effects, this underestimation propagates through to the cumulative assessment. Consequently, the baseline from which cumulative impacts are measured is already diminished, leading to an inaccurate foundation for further evaluation.

Because the cumulative assessment builds upon this flawed baseline, the combined effects of the proposed development alongside other existing, consented, and foreseeable projects are similarly understated. This reliance on reduced initial assessments results in a cumulative impact evaluation that fails to capture the true scale of potential adverse effects. Therefore, the assessment cannot be considered reliable or comprehensive in its current form.

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.

1.1.155 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 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.

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

Despite this, the assessment underestimates the cultural and community significance of these effects. Iona's monastic landscape, comprising internationally important heritage assets such as the Abbey, the Nunnery, and high crosses, is intrinsically linked to pilgrimage, arrival by sea, and movement through the landscape, as detailed in the applicant's own baseline. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet no visualisations were provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, leaving important heritage perspectives unassessed. Furthermore, a household consultation revealed that 92 per cent of Iona respondents object to the proposal, yet the applicant failed to assess habitability impacts, despite acknowledging this as a potential pathway of effect. The perceived scale of the turbines is emphasised by the comparison to Ben Hynish on Tiree, a 141-metre landmark visible from Iona at 33 kilometres; the turbines would exceed this height by approximately 194 metres at just two-thirds of that distance. Taken together, these factors indicate that the applicant's evaluation significantly understates the visual, community, and heritage impacts on Iona, compromising the accuracy of the environmental and social impact assessment.

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

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

Moreover, the chain of communities along the west coast of Kintyre, whose character, outlook, and visitor economy are intimately tied to the open Atlantic seaboard facing Islay, Jura, and adjacent waters, has also been overlooked. This oversight extends to the Treshnish Isles and other small islands and mainland coasts with views toward the development area, all of which share a similarly direct visual and economic relationship to the seascape. Collectively, these omissions indicate that the assessment does not fully account for the breadth of receptors potentially affected, thus compromising its overall robustness and reliability.

The applicant's reliance on a distance-based approach to 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.

1.1.157 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the necessary statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along this coastline. However, independent reviews of the applicant's documentation reveal that these impacts have been consistently underestimated, and a comprehensive heritage assessment, as mandated, has not been undertaken. Furthermore, while the effects on the island communities concerned were identified, no assessment of these impacts has been conducted. The applicant has also not demonstrated that the ecological safeguards can be fulfilled. Crucially, the application submitted to the Scottish Ministers encompasses only a portion of the project, thereby lacking completeness.

Given these substantial shortcomings, it is respectfully submitted that consent for the MachairWind Offshore Wind Farm and the related marine licence should be refused. Should the Scottish Ministers consider granting consent, it is requested that they require the provision of additional environmental information and enhanced visual representations. Moreover, determination of the applications should be deferred until after a public inquiry, allowing for a thorough examination of the issues raised by this objection. Regardless of the outcome, it is further urged that the Ministers explicitly address and record their conclusions on the impacts upon cultural heritage and the affected island communities within their decision rationale.

Yours faithfully,

[Redacted]

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

Member of the public 618
Dear Sir/Madam,

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

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

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

1.1.158 Legislative and Policy Framework

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 proposal fails to comply with the mandatory requirements for environmental impact assessment and habitats regulations assessment, rendering the application legally deficient and unsuitable for approval. Under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, it is a statutory obligation that the likely significant environmental effects of the development are identified, thoroughly assessed, and transparently reported prior to any determination. This procedural prerequisite has not been satisfied in the current submission. Furthermore, the Habitats Regulations impose a clear duty to assess the effects of the proposal on European protected sites in accordance with the applicable statutory tests. The evidence before the determining authority does not demonstrate compliance with these requirements. Instead, it reveals deficiencies and omissions in the environmental information provided, as well as a failure to undertake the necessary habitats regulations assessment. Such shortcomings constitute a direct conflict with the relevant legal and policy framework. In accordance with established principles, where compliance with these statutory duties has not been demonstrated, and where the evidence identifies such material deficiencies, these matters must weigh decisively against the granting of consent. Therefore, on the basis of the inadequate environmental impact assessment and the absence of a compliant habitats regulations assessment, the application should be refused.

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 applicant has failed to provide robust, objective, and proportionate evidence demonstrating compliance with every relevant statutory duty, planning policy, and environmental assessment requirement. This failure to meet the evidential burden is

a fundamental deficiency in the application. The absence of such demonstration, coupled with identified omissions and conflicts with the applicable legal and policy framework, constitutes a clear breach of the applicant's responsibility. In accordance with established principles, these unresolved matters must weigh decisively against the granting of consent. Therefore, on the basis of the applicant's failure to satisfy the requisite legal and policy evidential standards, the application should be refused.

1.1.159 Conflict with National Planning Framework 4 and the Development Plan

The proposal does not 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, such support is expressly contingent upon adherence to its impact criteria, including the protection of communities under Policy 11(c), and the safeguarding of landscape, seascape, and other receptors as required by 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 fails to demonstrate adequate protection for the cultural significance of scheduled monuments and their settings, nor does it show that island communities would be safeguarded. Additionally, the ecological assessments submitted do not satisfactorily establish that the necessary environmental tests can be met. Taken together, these shortcomings indicate a clear conflict with the key impact criteria of NPF4 Policy 11.

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

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

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

The practical consequence of the proposal is that it would cause adverse effects on the landscape, heritage, and community interests safeguarded by the terrestrial

development plan, including the Argyll and Bute Local Development Plan 2. These elements are fundamental to the local environment and identity, and their protection is a clear objective of the relevant policies. The proposal's impacts run contrary to these aims, resulting in tangible harm to the area's character and valued assets.

This conflict with the development plan framework is significant and cannot be overlooked. The proposal fails to align with the policies set out in the Argyll and Bute Local Development Plan 2 that are material to land-based effects, underscoring an inconsistency with the established planning framework. Furthermore, this discord extends to the National Planning Framework 4 when considered in its entirety, which the applicant has not successfully rebutted or mitigated through their submissions.

In conclusion, the proposal's adverse effects and policy conflicts demonstrate that it is not supported by the terrestrial development plan framework. Given the clear and substantive nature of these inconsistencies, the proposal should be regarded as contrary to the planning policies designed to protect the landscape, heritage, and community interests of Argyll and Bute. It follows that the proposal should be refused on these grounds.

1.1.160 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.

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.

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.

1.1.161 Effects on Island Communities, Tourism and the Local Economy

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

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

of the island communities themselves. Despite this omission, the assessment concludes that these island communities exhibit low sensitivity to tourism effects.

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

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

The proposal fails to 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.

1.1.162 Cumulative and In-Combination Effects

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

Therefore, the current method is procedurally and legally flawed, as it prevents a holistic appraisal of the project's cumulative effects.

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 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.

1.1.163 Public Engagement, Site Selection and Environmental Information

The consultation process for the site-selection has been fundamentally compromised by deficiencies in public participation, directly affecting the legitimacy of the entire exercise. The applicant requests Scottish Ministers to place significant weight on the site-selection process; however, this process has been marred by inadequate engagement at both the plan and site-selection stages, persisting into the current application phase. Notably, the application documentation consists of many thousands of pages of technical material. The consultation period occurred during the busiest months of the year for island communities, when residents are fully occupied by continuous work throughout the visitor season and access to specialist advice is at its lowest. In stark contrast, the applicant has benefitted from years of preparation supported by substantial professional and financial resources, creating a substantial imbalance in the ability to engage meaningfully.

National planning policy, specifically GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, mandate that those affected by decisions of this scale must have a realistic and fair opportunity to participate. The conditions imposed on the affected communities in this instance fall significantly short of these standards. This failure undermines the integrity of the decision-making process, and it is requested that Ministers give careful consideration to this deficiency when evaluating the representations submitted.

There remains significant uncertainty regarding the sufficiency of the Environmental Impact Assessment submitted with this application. While the assessment is extensive in scope, its adequacy for informed decision-making is fundamentally in question. Across multiple topic areas, the application identifies pathways to significant effects but either fails to investigate these effects fully or relies on assessment methodologies that do not substantiate the conclusions presented. For example, the landscape assessment employs a distance-based outcome pattern not supported by its own stated methodology. Similarly, the heritage assessment does not adequately demonstrate the application of its integrity test, and the socio-economic assessment lacks a place-based analysis specifically addressing the affected islands. These shortcomings collectively undermine confidence in the reliability of the environmental information provided.

Moreover, the application's dependence on future assessment stages, post-consent plans, monitoring regimes, and subsequent approvals is incompatible with the requirements of the Environmental Impact Assessment Regulations. The Regulations mandate that likely significant effects must be understood and evaluated prior to determination, not deferred to later stages. The Scottish Ministers are therefore required to make their decision based on the evidence currently before them, without assuming that unresolved issues will be satisfactorily addressed in the future. Given that the applicant has not demonstrated the adequacy of the environmental information as submitted, it follows that the assessment is insufficient to support a fully informed and lawful determination of this application.

1.1.164 Effects on Local Area

The applicant's assessment notably lacks a comprehensive evaluation of the effects on Islay and Colonsay communities, particularly when compared to the mitigation measures proposed for other project locations. While the development area spans 448 square kilometres immediately north-west of Islay and west of Colonsay, the application treats Islay primarily as a potential project site rather than as an affected community in its own right. This approach overlooks the proximity of Atlantic-facing communities on Islay, which face the nearest edge of the development area without any detailed, place-based consideration of impacts on their setting, economy, or community life. In contrast, effective mitigation strategies would require such tailored assessments to address the direct and significant influences on local populations.

Moreover, the situation on Colonsay and Oronsay underscores further shortcomings in the assessment. Both islands' seaward outlook, integral to their daily life, directly faces the project array. The North Colonsay and Western Cliffs Special Protection Area, forming part of Colonsay's coastline, is central to the applicant's derogation

case and compensation plan, implicitly acknowledging unavoidable harm to the internationally protected seabird population. Additionally, Oronsay Priory—a scheduled monument of national importance—lies within this community and suffers from an inadequate heritage assessment, particularly concerning the preservation of its open maritime setting. Taken together, these deficiencies undermine the reliability of the environmental and heritage impact evaluation and signal a need for a more robust, community-centred appraisal.

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 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 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 while attributing a Low magnitude of change. This evaluation significantly understates the true scale of impact on Tiree's landscape character. Tiree is an exceptionally low-lying island, its entire character defined by the dominance of sea and sky, with its highest point, Ben Hynish, rising only 141 metres. The introduction of turbines up to 335 metres in height would create vertical structures unprecedented in Tiree's seascape. Given the island's reliance on an open oceanic horizon as a defining feature, the conclusion of

a Low magnitude of change for such an exposed and sensitive receptor is not credible. This underestimation leads to an unreliable overall evaluation of effects on Tiree's distinctive landscape, warranting a reconsideration of the assessment's findings.

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 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.

1.1.165 Personal Observations

In addition to the planning matters above, I am personally concerned because: We are passionate about the loss of our unique seascapes and heritage of the island's communities- this is a great threat to tourism and a potential economic loss.

Based on my own local knowledge, I also wish to highlight that: All of it is important - it would be wrong to make one more important than the other.

Finally, I would also ask the Scottish Ministers to consider: Protect our country and its unique environment and culture, Don't sell us off and allow profiteers to benefit from our loss!

1.1.166 Summary

The proposal for the MachairWind Offshore Wind Farm has failed to demonstrate compliance with the applicable statutory and policy frameworks governing its determination. The applicant's own assessment acknowledges significant impacts on nationally designated landscapes, as well as on the cultural heritage and communities along this coastal area. Moreover, independent reviews of the submitted documents reveal that these impacts have been understated. Crucially, the necessary heritage assessment has not been undertaken, and although the effects on the island communities within the project's influence were identified, they have never been formally assessed. Additionally, the ecological requirements have not been proven to be achievable. It should also be noted that the application before the Scottish Ministers does not encompass the entire project.

Given these substantial shortcomings, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to reject the associated marine licence. Should the Ministers consider proceeding with the application, I request that they require the submission of further environmental information alongside enhanced visualisations. In such a scenario, the determination of the applications ought to be deferred until after a public inquiry, 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 to 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 619
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, which are currently under consideration through application 00012385 for consent pursuant to section 36 of the Electricity Act 1989, and application 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. These applications, lodged by MachairWind Limited (ScottishPower Renewables), seek approval for the development of an offshore wind farm with an installed capacity of approximately 2 gigawatts. The project entails the erection of between 91 and 144 turbines, each reaching up to 335 metres in height to blade tip, situated within a designated Windfarm Development Area encompassing some 448 square kilometres of marine space north-west of Islay and west of Colonsay, at a distance of roughly 21 kilometres from Iona, and in proximity to several islands and coastal communities in the southern Hebrides.

I request that this correspondence be formally recorded as an objection, that my status as an objector be acknowledged, and that I am kept informed of any decisions relating to these applications.

The detailed planning and environmental grounds underpinning my opposition are set out below, framed within the statutory and policy context governing the determination of such proposals. It is important to emphasise that the responsibility lies squarely on the applicant to provide compelling and adequate evidence demonstrating compliance with all relevant statutory tests. The duty is not on those raising objections to prove the contrary. In this instance, the applicant has failed to satisfy the evidential requirements necessary to justify consent. Consequently, the applications should be refused.

1.1.167 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 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 applicant's evidence acknowledges that the proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration to the character of the night-time seascape throughout the stated 35-year operational lifespan. This lighting would be a novel and continuous presence, fundamentally changing the visual environment after dark in an area that is at present characterised by natural darkness and minimal artificial illumination. The significance of this change is heightened by the permanence of the effect during the development's operational period, which underscores the extent to which the night-time seascape character would be impacted.

From a policy perspective, it is important to note that the 35-year operational life does not mitigate the harm caused to the seascape. The decision to grant consent for this development is effectively a determination that the seascape in question is appropriate for wind farm use, notwithstanding the permanent visual changes introduced by lighting. This recognition emphasises that the harm to night-time character is not merely a temporary inconvenience but a lasting transformation accepted under planning policy. Consequently, the implications of lighting effects on the seascape must be carefully weighed within the overall planning balance, with full awareness that the decision establishes a precedent for the suitability of this environment for such development and its associated visual impacts.

The applicant acknowledges that the proposed development'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.

1.1.168 Cultural Landscape, Archaeology and Historic Environment

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

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

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

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

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

1.1.169 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 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 meet essential planning and statutory requirements concerning island communities, notably neglecting the thorough assessment demanded by GEN 19 and paragraph 4.81 of the National Marine Plan. These provisions mandate that decisions affecting island communities be grounded in robust socio-economic evidence and adopt a precautionary approach where such evidence is insufficient. Furthermore, NPF4 Policy 11(c) alongside the Islands (Scotland) Act 2018 explicitly require that the interests of island communities be carefully evaluated and given due weight through meaningful engagement from the earliest stages through to the conclusion of any decision-making process.

Despite recognising that island communities warrant particular scrutiny, the applicant has not conducted the necessary assessment to comprehend fully the potential effects of the proposal on these communities. There is a clear absence of evidence demonstrating compatibility with sustainable island communities, and as such, the applicant has not satisfied the statutory duties owed to these populations. This omission represents a significant shortfall in meeting the standards set by relevant policy and legislation, undermining the integrity of the decision-making framework.

In conclusion, given the quantifiable lack of assessment and failure to discharge statutory obligations, the proposal cannot be considered compliant with the comprehensive planning and statutory duties designed to protect island communities. It is therefore appropriate that the proposal be refused on these grounds to ensure that the interests and sustainability of island communities are properly safeguarded.

1.1.170 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, with the surrounding waters providing habitat for seabirds, marine mammals, and basking sharks. The proposed project would introduce construction, operational, and decommissioning activities into this ecologically sensitive environment on a very large scale and over several decades. Given the presence of these protected species and habitats, the potential for significant adverse environmental effects is considerable, necessitating careful assessment and mitigation measures to safeguard the ecological integrity of the site and its marine surroundings.

The applicant has acknowledged the potential for adverse impacts on the guillemot population within the North Colonsay and Western Cliffs Special Protection Area by submitting both a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan. These documents indicate that the applicant cannot categorically exclude an adverse effect on the integrity of this protected site, quantifying the potential impact as significant enough to require detailed mitigation and compensation measures.

Such submissions are specifically prepared for scenarios where the integrity of a protected site might be compromised and where derogation provisions under relevant environmental regulations may need to be invoked. The presence of these documents within the application materially demonstrates the applicant's recognition of the risks posed by the development, and their intention to address these through prescribed compensatory mechanisms.

In conclusion, the submission of these documents is a critical component of the application, reflecting the applicant's own approach that adverse effects cannot be ruled out and that the Scottish Ministers may reasonably reach a differing conclusion regarding the site's integrity. This recognition underlines the necessity for stringent scrutiny of the application's potential impacts and the proposed compensatory measures before any consent is granted.

1.1.171 Cumulative and In-Combination Effects

The assessment of cumulative effects within the Environmental Impact Assessment relies fundamentally on the baseline conditions established by preceding landscape, heritage, and socio-economic evaluations. However, these foundational assessments have been demonstrated to understate the true extent of impacts, leading to an initial baseline that is artificially diminished. Consequently, any cumulative impact analysis that builds upon this flawed baseline inherently inherits these inaccuracies, resulting in a systematic underestimation of the combined effects when the current proposal is considered alongside existing, consented, and foreseeable developments.

This methodological shortcoming undermines the reliability of the cumulative impact conclusions, as the starting point fails to reflect the genuine environmental and social context. The understated baseline reduces the perceived significance of incremental changes, thereby masking the full extent of potential harm. Without an accurate and robust baseline, the cumulative assessment cannot provide a dependable account of

the total effects, which is critical for informed decision-making and effective mitigation planning. It follows that the current cumulative impact assessment cannot be regarded as sufficiently comprehensive or trustworthy in its present form.

1.1.172 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.

1.1.173 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.

1.1.174 Summary

The proposal submitted by the applicant fails to satisfy the relevant statutory and policy requirements governing its determination. Their own evaluation acknowledges substantial impacts on nationally designated landscapes, as well as on the cultural heritage and communities of the coastal area in question. Furthermore, independent reviews of the applicant's documentation reveal that these impacts have been systematically underestimated. Crucially, the necessary heritage assessment has not been conducted. Although potential effects on the island communities within the project's scope were identified, no formal assessment of these impacts has been undertaken. Additionally, the project has not demonstrated compliance with required ecological criteria. It is also important to note that only a portion of the entire scheme has been submitted for the Scottish Ministers' consideration.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse both consent for the MachairWind Offshore Wind Farm proposal and the associated marine licence. Should the Ministers decide against refusal at this stage, I request that further environmental information be sought, accompanied by enhanced visualisations. I also recommend that the applications be subject to a public inquiry, thereby allowing full and thorough examination of all issues raised by this objection. Regardless of the ultimate decision, it is essential that the Scottish Ministers explicitly address and provide clear conclusions on the impacts on cultural heritage and the affected island communities within their reasoning.

Yours faithfully,

[Redacted]

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

Member of the public 620
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, as detailed in application numbers 00012385, seeking consent under section 36 of the Electricity Act 1989, and 00012386, applying for a marine licence under Part 4 of the Marine (Scotland) Act 2010. I request that this objection be formally recorded, that I be registered as an objector, and that I receive notification of the final decisions regarding these applications.

The project in question aims to establish an offshore wind farm with an installed capacity of approximately 2 gigawatts. It would involve the installation of between 91 and 144 turbines, each with a maximum height of up to 335 metres to blade tip. This development is proposed within a designated Windfarm Development Area spanning roughly 448 square kilometres of marine environment located to the north-west of Islay and west of Colonsay. Notably, the site lies approximately 21 kilometres from the island of Iona and is in proximity to various islands and coastal settlements within the southern Hebrides.

The rationale for objection is grounded in the applicable statutory and policy frameworks governing the determination of these applications. It is essential to emphasise that the onus lies squarely on the applicant to provide sufficient and robust evidence demonstrating that all relevant statutory tests and policy requirements are met. Objectors, including myself, are not obliged to prove the contrary. Upon careful consideration of the evidence presented, it is clear that the applicant has failed to satisfy this evidential burden. Consequently, the applications should be refused consent.

1.1.175 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 needs and circumstances of island communities during the planning process. The submitted documentation does not demonstrate compliance with this duty, nor does it provide adequate evidence that the interests of island communities have been sufficiently identified, assessed, or given due weight. Such deficiencies and omissions constitute a clear conflict with the applicable legal and policy framework established by the Islands (Scotland) Act 2018. In accordance with established principles, where compliance with this statutory duty is not demonstrated, these shortcomings must weigh against the granting of planning consent. Therefore, on the basis of the failure to properly consider and give due weight to island communities' interests as required by the Islands (Scotland) Act 2018, the proposal should be refused.

1.1.176 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 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 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.

1.1.177 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of the proposed development's impact on the setting of historic assets does not fully comply with the recognised methodology established by

Historic Environment Scotland. While the applicant claims to have adopted this methodology, which necessitates evaluating whether changes to setting affect its contribution to the cultural significance of heritage assets and whether the integrity of that setting is adequately retained, the assessment fails to demonstrate this critical evaluative step. Notably, the methodology explicitly states that visual change should not be directly equated with adverse impact, yet the applicant's analysis appears to overlook this distinction.

A detailed Methodological Audit, prepared in support of community objections and based solely on the applicant's Appendix 14.3, reveals that although the assessment identifies relevant heritage attributes such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it stops short of showing how the integrity of setting has been assessed in accordance with the applicant's own accepted methodology. The Audit finds that the assessment merely describes visual changes and then asserts that the integrity of setting is adequately retained without providing the necessary evaluative reasoning. This omission undermines the reliability of the applicant's conclusions regarding heritage impacts and calls into question the robustness of the assessment overall.

The applicant's baseline assessment acknowledges that the cultural significance of the heritage assets in question arises from a complex set of qualities. These include aspects such as pilgrimage, arrival by sea, and movement through a living cultural landscape. It also recognises the importance of the relationships between monuments, spirituality, and the surrounding landscape and seascape, which are experienced dynamically through movement rather than from fixed viewpoints.

Historic Environment Scotland, in their consultation responses recorded within the application, requested the inclusion of additional viewpoints to ensure that these broader experiential qualities are fully captured. This suggests that the initial assessment may not have adequately represented the wider cultural landscape and the nuanced ways in which the heritage assets are appreciated and experienced.

Given these considerations, it is important that any further assessment or mitigation fully embraces the dynamic and relational nature of the cultural significance identified. Without this, the potential impacts on the heritage assets could be underestimated, leading to an incomplete understanding of the effect on the cultural landscape as a whole.

The 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 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.

1.1.178 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 represents a potentially significant pathway through which the proposal could impact island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 focuses primarily on regional analysis, providing detailed examination of potential port communities but omitting a comparable place-based evaluation of the island communities directly facing the development. Notwithstanding this absence, the assessment nonetheless concludes that these island communities exhibit low sensitivity to tourism effects. This approach fails to address the particular circumstances of the islands and thereby undermines the reliability of the conclusions drawn.

Small island economies cannot be accurately represented as regional averages, given that their economic structures are often concentrated in sectors most vulnerable to fluctuations in the qualities that attract visitors. Rather than reducing sensitivity, a dependence on increasing visitor numbers intensifies reliance on these qualities, which are precisely those at risk from the proposed development. Therefore, the assertion of low sensitivity to tourism impacts, reached without any place-specific analysis, is unfounded and amounts to an unsubstantiated assumption rather than evidence. This fundamental flaw in the applicant's socio-economic assessment methodology calls into question its adequacy in understanding or mitigating the effects on island communities.

The proposal fails to meet 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.

1.1.179 Ecology, Biodiversity and Habitats Regulations

The proposed development would result in construction, operation, and decommissioning activities at a very large scale, persisting for decades within an area that includes Priority Marine Features and Annex I habitats. These ecologically sensitive sites are located not only within the development footprint but also extend into the surrounding waters, which are known to support important populations of seabirds, marine mammals, and basking sharks. Given the recognised ecological importance and vulnerability of these habitats and species, the proposal carries a significant risk of adverse environmental effects. This context necessitates a thorough assessment of potential impacts and careful consideration of mitigation measures to safeguard the integrity of these protected marine environments.

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

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

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

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.

1.1.180 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 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 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 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.

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 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 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.

1.1.181 Personal Observations

In addition to the planning matters above, I am personally concerned because: Big tech continues to roll over the little people in this world for profit, further harming the natural landscapes that provide peace and serenity to people. This will damage the environment more than it preserves it, most especially with it being a costal area. Leave the windfarms to those places of low population and barren landscapes.

1.1.182 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 adverse impacts upon nationally designated landscapes, as well as the heritage and communities of the coastal area. However, independent scrutiny of the submitted documentation reveals that these impacts have been consistently underestimated. Furthermore, the necessary heritage assessment has not been undertaken in accordance with statutory obligations. The ecological criteria set out in the applicable regulatory framework remain unmet, as no convincing demonstration has been provided that these tests can be satisfied. Of particular concern is the absence of any assessment of the effects on the island communities affected by the proposal, despite their identification in the application materials. Additionally, it should be noted that only a portion of the entire project has been submitted for consideration by the Scottish Ministers.

In light of these substantial deficiencies, it is respectfully urged that Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm application, and also decline to grant the associated marine licence. Should the Ministers determine not to refuse outright, it is requested that they require the submission of further environmental information alongside enhanced visualisations to allow for a more comprehensive appraisal. It is further recommended that the decision be deferred pending a public inquiry, thereby enabling a full and rigorous examination of the issues raised in this objection. Regardless of the outcome, it is essential that the Ministers explicitly address and record their conclusions on the proposal's effects on cultural heritage and the impacted island communities within their formal 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 621
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, which encompass 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 correspondence be recorded as an objection, that I be officially registered as an objector, and that I receive notification of the final determination of these applications.

The proposals envisage the development of an offshore wind farm with an installed capacity of approximately 2 gigawatts. This would involve the installation of between 91 and 144 turbines, each with blade tips reaching up to 335 metres in height. The project site lies within a Windfarm Development Area spanning some 448 square kilometres of marine space situated to the north-west of Islay and to the west of Colonsay. The location is approximately 21 kilometres from the island of Iona and lies in proximity to the islands and coastal settlements of the southern Hebrides.

The basis for this objection is founded on planning and environmental considerations framed by the statutory and policy context applicable to these proposals. It is incumbent upon the applicant to provide compelling and sufficient evidence demonstrating that all relevant statutory tests and policy requirements have been met. The onus is not on objectors to disprove the application but rather on the applicant to discharge this burden of proof. In my assessment, the applicant has failed to meet these obligations satisfactorily. Consequently, I contend that consent for both the section 36 application and the marine licence should be withheld.

1.1.183 Seascape, Landscape and Visual Effects

When considering the visual impact of the proposed development, it is essential to weigh the mitigation measures against the inherent limitations of the visualisation materials presented. While mitigation strategies may be designed to reduce visual intrusion, the supporting visual evidence, including printed visualisations and wireline drawings, must be critically evaluated for their accuracy and reliability. The applicant’s reliance on NatureScot’s visualisation guidance acknowledges that printed visualisations are unable to fully replicate the scale and spatial perception experienced by a viewer in the field. Consequently, any assessment based on these materials should be tempered by an understanding that the visualisations may underrepresent or distort the true visual impact, thereby limiting the effectiveness of the proposed mitigation as demonstrated in the submitted evidence.

Furthermore, the wireline drawings, which are incorporated within the same panoramic projections as the photographs, share the inherent limitations of the photographic images they accompany. These drawings are technical renderings intended to supplement the visualisations but do not function as independent or corrective tools to address the shortcomings of the photographic material. This means that the visual impact assessment cannot rely solely on these materials to accurately convey the scale and prominence of the development within the landscape. The combined limitations of these visualisation tools highlight the need

for a cautious and critical interpretation of the evidence, recognising that the true visual effects may be more significant than the materials suggest.

The proposed development would introduce aviation and navigation lighting to a 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.

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.

1.1.184 Cultural Landscape, Archaeology and Historic Environment

The applicant's baseline assessment identifies that the cultural significance of the affected heritage assets arises from a combination of qualities, notably pilgrimage routes, arrival by sea, movement through an active cultural landscape, interrelated monuments, spirituality, and the encompassing landscape and seascape experienced dynamically rather than from fixed viewpoints. However, 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 fully captured. This indicates a potential shortfall in the applicant's assessment, which risks underrepresenting the wider cultural context essential to understanding heritage impacts comprehensively.

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.

1.1.185 Effects on Island Communities, Tourism and the Local Economy

While mitigation measures may seek to address certain impacts, they fall short in safeguarding the essential qualities that underpin the economic and social fabric of the island communities affected by this proposal. These communities depend to an exceptional degree on visitors, who are drawn specifically by the attributes identified in the applicant's own baseline assessments: landscape, seascape, cultural heritage, tranquillity and remoteness. Any alterations to these defining characteristics strike directly at the economic base of these communities. Such a disruption threatens not only local services and population stability but also the long-term viability of these island communities themselves. Consequently, the proposal poses a fundamental risk to their economic and social sustainability.

1.1.186 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.

1.1.187 Cumulative and In-Combination Effects

The practical consequence of relying on the current cumulative impact assessment is that the true combined effects of the proposed development alongside existing, consented, and foreseeable projects are significantly underestimated. This has important implications for decision-makers who depend on accurate evaluations to fully understand potential environmental and socio-economic consequences. An understated baseline leads directly to an understated cumulative impact, which risks overlooking meaningful harm that may arise from the aggregate of developments in the area.

This problem arises because the cumulative assessments draw upon conclusions established elsewhere in the Environmental Impact Assessment. Specifically, where the foundational landscape, heritage, and socio-economic assessments have already minimized or failed to fully capture the extent of effects, the cumulative assessment necessarily begins from this flawed baseline. As a result, the combined effects are not properly accounted for, reducing the reliability of the overall assessment and weakening the evidential basis for planning decisions.

In light of this, the cumulative impact assessment cannot be considered a robust or trustworthy reflection of the likely combined effects of development in the locality. A more rigorous and comprehensive baseline evaluation is essential to ensure that cumulative assessments accurately reflect reality. Without this, the planning process risks proceeding on an incomplete understanding of potential impacts, which may lead to inadequate mitigation measures or inappropriate approval of proposals.

1.1.188 Personal Observations

In addition to the planning matters above, I am personally concerned because: This area is a vital place of spiritual renewal This western seaboard is totemic; to industrialise it is corporate vandalism on a massive scale and unforgiveable.

1.1.189 Further Comments

This project is based on the worship of money, profit, and of no benefit to the local people, the destruction of their tourist trade

1.1.190 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 622
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.

1.1.191 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 and physiographical features of special interest, as well as on sites, buildings, and objects of architectural, historic, or archaeological interest, as required by Schedule 9 of the Electricity Act 1989. The evidence provided does not adequately address these statutory duties, leaving significant uncertainties and omissions regarding the protection and conservation of these important interests.

Given that the Scottish Ministers must have regard to these same statutory duties in determining the application, the absence of demonstrated compliance and the identified deficiencies weigh decisively against the granting of consent. The application’s failure to meet the legal requirements under Schedule 9 constitutes a fundamental procedural and substantive defect that cannot be overlooked in the decision-making process.

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 confirms that the applicant has not demonstrated compliance with these statutory requirements. There are clear deficiencies and omissions in the environmental impact assessment, as the submission lacks a comprehensive identification and evaluation of significant environmental effects. Similarly, the habitats regulations assessment is incomplete and fails to address the necessary statutory tests for European protected sites adequately.

Given these failures, the proposal conflicts with the applicable legal and policy framework governing environmental and habitats assessments. Such non-compliance is a fundamental procedural and evidential shortcoming that must weigh decisively against the granting of consent. Without a full and proper assessment as required by law, the determining authority cannot lawfully approve 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 given due weight in the decision-making process. The evidence confirms that this statutory obligation is clear and unequivocal, establishing a legal framework within which proposals affecting island communities must be assessed.

In this case, the proposal fails to properly consider or weigh the interests of island communities as required by the Act. There are evident deficiencies and omissions in the applicant's assessment, and no satisfactory demonstration that the statutory duty has been fulfilled. As the evidence states, where such compliance is not shown, or where conflicts with the applicable legal and policy framework arise, these matters must weigh against the granting of consent. Accordingly, the proposal should be refused on the basis that it does not meet the statutory requirements of the Islands (Scotland) Act 2018.

The applicant has failed to dispel fundamental uncertainty regarding compliance with the full spectrum of relevant legal and policy requirements. It is a well-established principle that the onus lies squarely on the applicant to provide robust, objective, and proportionate evidence demonstrating that every applicable statutory duty, planning policy, and environmental assessment obligation has been met. In this case, the evidence submitted does not meet this evidential burden. The absence of comprehensive and conclusive proof leaves critical questions unresolved about whether the proposal aligns with the necessary legal and policy frameworks. This lack of clarity undermines confidence in the application's conformity with statutory and policy mandates.

Moreover, the evidence presented reveals clear deficiencies and omissions that directly conflict with the applicable legal and policy framework. Where such conflicts or gaps exist, established planning principles dictate that these matters must weigh decisively against the granting of consent. The applicant's failure to demonstrate compliance in these respects is not a mere procedural oversight but a substantive shortcoming that precludes lawful approval. Given the unresolved uncertainties and demonstrable evidential failings, the proposal cannot be considered compliant with

the statutory and policy requirements that govern the planning process. Consequently, the application should be refused on the basis that the applicant has not fulfilled the necessary responsibility to prove compliance.

1.1.192 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 renewable energy initiatives, this support is conditional upon adherence to specific 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 proposal does not satisfactorily meet these conditions, which are integral to the policy's framework.

In particular, the proposal would result in significant adverse effects on nationally designated landscapes and seascapes. It has also failed to demonstrate that the cultural significance of scheduled monuments and their settings would be preserved, nor that island communities would be adequately safeguarded. Furthermore, the ecological assessments provided do not conclusively show that the necessary tests can be satisfied. Taken together, these deficiencies establish a clear conflict with the impact criteria of NPF4 Policy 11, indicating that the proposal cannot be supported in its current form.

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 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.

1.1.193 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 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 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.

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.

1.1.194 Cultural Landscape, Archaeology and Historic Environment

There is considerable uncertainty regarding the reliability of the heritage impact conclusions, given their dependence on the landscape assessment. The landscape assessment itself appears to understate the magnitude of effects, which raises questions about the robustness of any findings that rely upon it.

Specifically, the heritage conclusions are not independent but are constructed upon the foundation provided by the landscape assessment. Consequently, any understatement or deficiency in evaluating landscape effects is inevitably transmitted to the heritage conclusions, thereby diminishing their credibility.

This reliance highlights a critical weakness in the overall assessment process. Until the landscape effects are comprehensively and accurately evaluated, confidence in the heritage impact conclusions must remain cautious and provisional.

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.

1.1.195 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 acknowledged that habitability represents a potentially significant pathway through which the proposal could affect island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 focuses predominantly on regional-level analysis, giving detailed consideration to potential port communities while failing to conduct an equivalent place-based evaluation of the island communities directly facing the development. Nevertheless, the assessment concludes that these island communities exhibit low sensitivity to tourism effects.

It is important to recognise that small island economies cannot be adequately represented by regional averages. Their economic structures are often concentrated in sectors that are directly vulnerable to alterations in the environmental and social qualities that attract visitors. Rather than diminishing sensitivity, reliance on increasing visitor numbers tends to deepen these communities' dependence on the qualities that may be at risk from the proposal. Therefore, concluding low sensitivity without a tailored place-based analysis does not constitute robust evidence but instead amounts to an unsubstantiated assumption.

Given these considerations, the socio-economic assessment's methodology appears fundamentally flawed and insufficient to fully understand or mitigate the impacts on island communities. A more nuanced, locality-specific approach is necessary to capture the true nature of potential effects and to inform appropriate planning decisions. Without this, the assessment risks overlooking significant socio-economic vulnerabilities inherent to these island settings.

The 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.

1.1.196 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.

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.

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.

1.1.197 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 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.

1.1.198 Public Engagement, Site Selection and Environmental Information

There is a significant uncertainty regarding the adequacy of public participation in the consultation process associated with the site-selection and application stages. The applicant places considerable weight on the site-selection process, making the quality of public involvement in that process directly material to the legitimacy of the decisions sought. However, deficiencies in participation identified at the plan and site-selection stages have persisted into the application stage. The application itself consists of many thousands of pages of technical material, yet the consultation period has coincided with the busiest months of the year for island communities, a time when residents are fully engaged in continuous work throughout the visitor season and access to specialist advice is particularly limited. This contrasts starkly with the applicant's position, having had years and substantial professional and financial resources to prepare its case.

Furthermore, GEN 18 of the National Marine Plan, together with the principles of effective public participation enshrined in the Aarhus Convention, require that those affected by decisions of such magnitude are afforded a realistic opportunity to engage meaningfully. The conditions under which the affected communities have been compelled to respond fall short of this standard. Given these circumstances, it is essential that Ministers bear this firmly in mind when considering the representations made, as the shortcomings in consultation undermine the credibility and fairness of the site-selection process.

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.

1.1.199 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.

While the applicant acknowledges some significant effects on Iona, particularly in terms of visibility and community impact, their assessment appears to underestimate the scale and importance of these effects when compared to established mitigation benchmarks. The Coastal Character assessment designates the Sound of Iona as having high sensitivity, with direct orientation towards the development and extensive visibility. It notes a large geographical extent of change, encompassing approximately 21 kilometres, with turbines spanning around 39 degrees of the horizon, resulting in a moderate and significant overall effect. This level of impact surpasses typical thresholds where mitigation measures are expected to be robust and comprehensive.

Moreover, the applicant's recognition of significant effects on residents and visitors across much of the island, including at Dùn Ì—the highest point on Iona—does not fully account for the island's exceptional heritage context. Iona's monastic landscape, comprising the Abbey, the Nunnery, and the high crosses, holds international significance, intrinsically linked to pilgrimage routes, sea arrival, and movement through the landscape. Despite Historic Environment Scotland's request for additional viewpoints, such as from the ferry crossing and elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, these visualisations are absent from the applicant's submission. This omission limits a comprehensive understanding of the potential heritage impacts, thereby undermining the thoroughness of the environmental and social impact evaluation.

Community concern further highlights the shortcomings of the applicant's assessment. A household consultation on Iona revealed that 92 per cent of

respondents oppose the proposal. Notably, habitability—a pathway of potential effect identified by the applicant's own consultants—remains unassessed. The perceived scale of the development is considerable; for context, Ben Hynish on Tiree, a familiar landmark standing 141 metres high and visible from Iona at about 33 kilometres, would be overtopped by the largest turbines by approximately 194 metres at roughly two-thirds of that distance. This comparison underscores the significant visual intrusion likely to be experienced. Taken together, these points suggest that the applicant's evaluation does not fully capture the magnitude of impacts on Iona, indicating a need for a more detailed and nuanced assessment to inform decision-making.

The applicant's assessment acknowledges significant effects on the Ross of Mull South coastal area, which is 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 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 assessment significantly underestimates the impact on Tiree's distinctive landscape, resulting in an unreliable evaluation of effects. The South Tiree coastal area is identified as having High sensitivity at a distance of approximately 35 kilometres, yet the magnitude of change is attributed as Low. This assessment fails to recognise the fundamental characteristics of Tiree's landscape, which is exceptionally low-lying and defined by the dominance of sea and sky. With its highest point, Ben Hynish, rising only 141 metres, the introduction of turbines up to 335 metres tall would create vertical structures unprecedented in the island's seascape. Given that Tiree's character is based on an open oceanic horizon, this scale of development would cause a far greater magnitude of change than acknowledged. Therefore, the conclusion of Low magnitude is a clear understatement for such an exposed and sensitive receptor, undermining the credibility of the applicant's assessment.

The applicant's assessment fails to 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 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.

1.1.200 Personal Observations

In addition to the planning matters above, I am personally concerned because: I have visited a small number of the islands in the area under consideration and plan to visit many more in the coming years. If this proposal goes ahead, I will be very unlikely to visit the affected area. This will deprive me of the experience of visiting and photographing remote and unspoilt areas in this part of Scotland.

Essentially, this development is totally inappropriate: not required, unsuitable location, over too large an area, turbines too tall.

Finally, I would also ask the Scottish Ministers to consider: I believe there is no pressing need for this development as Scotland is already able to generate significantly more energy than it requires, that the infrastructure is not in place to distribute it (therefore, a waste) and that the development will not benefit those living in the affected areas by reducing energy bills or providing them with greener energy.

1.1.201 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 623
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.

1.1.202 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 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 essential policies set out in National Planning Framework 4 (NPF4), specifically Policies 3, 4, 7, and 11, which address biodiversity, natural places, historic assets, and energy respectively. As a significant material consideration, NPF4 must be applied alongside statutory duties and legislative requirements, and the proposal's failure to demonstrate compliance with these policies has direct practical consequences for the protection and enhancement of the environment and heritage assets.

The evidence confirms that the application does not adequately address the requirements of Policy 3 (Biodiversity) and Policy 4 (Natural Places), resulting in deficiencies and omissions that undermine the conservation of natural habitats and landscapes. Similarly, the proposal conflicts with Policy 7 (Historic Assets and Places) by failing to safeguard the integrity and significance of designated heritage assets. Furthermore, the submission does not meet the standards of Policy 11

(Energy), lacking sufficient demonstration of sustainable energy considerations in line with the framework's objectives.

Given that compliance with these key policies has not been demonstrated, and the evidence identifies clear conflicts with the applicable legal and policy framework, these shortcomings weigh decisively against the granting of planning consent. The proposal's failure to satisfy the requirements of NPF4 and its associated policies constitutes a fundamental planning objection that must be upheld.

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017, along with the equivalent marine works regulations, mandate that the likely significant environmental effects of any proposal must be identified, assessed, and reported prior to the determination of the application. Additionally, the Habitats Regulations require that the effects of the proposal on European protected sites be assessed in strict accordance with the applicable statutory tests. These legal requirements are fundamental to ensuring that environmental considerations are fully integrated into the decision-making process.

In the case of the current proposal, there has been a failure to provide an adequate environmental impact assessment as required by the aforementioned regulations. The evidence before the determining authority does not demonstrate compliance with the statutory obligation to identify and assess the likely significant environmental effects. Furthermore, there is an absence of a satisfactory habitats regulations assessment addressing the potential impacts on European protected sites. This omission constitutes a clear deficiency in the application and represents a breach of the legal framework governing such developments.

Where compliance with these statutory requirements 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 failure to provide the necessary environmental impact assessment and habitats regulations assessment, the proposal does not meet the mandatory legal standards. 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.

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.

The applicant has failed to discharge the fundamental responsibility of demonstrating, 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 a prerequisite for the lawful consideration of the proposal and must be met in order to establish compliance with the comprehensive legal and policy framework governing the development.

In the absence of such demonstration, the application is marked by clear deficiencies and omissions that undermine confidence in its conformity with the applicable statutory and policy provisions. These shortcomings are not minor or technical but go to the heart of the legal and procedural requirements that must be fulfilled before consent can be granted. The failure to provide adequate evidence of compliance leaves the proposal in conflict with the established legal and policy framework.

Accordingly, these unresolved evidential gaps and conflicts must weigh decisively against the granting of planning consent. The absence of satisfactory proof that all statutory and policy obligations have been met precludes lawful approval and compels refusal of the application in accordance with the governing principles set out in the planning system.

1.1.203 Conflict with National Planning Framework 4 and the Development Plan

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

The proposal, as currently presented, would result in significant adverse impacts on a range of nationally designated assets, undermining the protections established by the National Planning Framework 4 (NPF4). Most notably, it would cause substantial harm to the qualities for which National Scenic Areas and other nationally important landscapes and seascapes have been designated. This outcome directly conflicts with Policy 11, which works in tandem with Policies 4(c) and 4(d) to safeguard these

special places from detrimental effects. The practical consequence is a clear failure to uphold the statutory purpose of these designations, thereby weakening the integrity of landscape conservation at a national level.

In addition to landscape concerns, the proposal fails to demonstrate adequate protection for heritage assets, particularly scheduled monuments and their settings. Policies 7 and 7(h) require that development does not adversely affect the cultural significance of such assets, ensuring their preservation for future generations. However, the evidence submitted does not convincingly establish that these requirements would be met. Nor does it confirm that island communities, which often have unique historical and social characteristics, would be safeguarded in line with Policy 7(c) and 7(d). The lack of clarity and assurance in this regard raises substantial doubts about the proposal's compliance with heritage protection standards within NPF4.

Furthermore, the ecological criteria set out in Policy 3 have not been satisfactorily addressed. The proposal has not provided sufficient evidence to confirm that the ecological tests—designed to conserve and enhance biodiversity—can be met. This omission is critical, as the protection of biodiversity is a fundamental objective underpinning national planning policy. Taken together, these deficiencies demonstrate that the proposal is inconsistent with the comprehensive framework of NPF4 policies intended to protect designated landscapes, heritage assets, and biodiversity. Consequently, it should not be supported in its current form.

The proposal would result in significant adverse impacts on the landscape, heritage, and community interests safeguarded by the Argyll and Bute Local Development Plan 2. These detrimental effects undermine the purpose of the policies designed to protect the terrestrial environment and local character of the area. Consequently, the proposal fails to align with the objectives set out in the development plan framework relevant to land-based considerations.

This inconsistency extends beyond the local plan to the National Planning Framework 4 when considered in its entirety. The applicant has not provided sufficient evidence to demonstrate that the proposal complies with or justifies departure from these strategic planning policies. As a result, the proposal stands in clear conflict with the established planning policy framework at both local and national levels.

In light of these points, the proposal cannot be supported as it contradicts essential policy protections for the land-based environment within Argyll and Bute. The adverse effects identified and the lack of demonstrable compliance with the development plan justify refusal in accordance with established planning principles.

1.1.204 Seascape, Landscape and Visual Effects

There is considerable uncertainty surrounding the reliability of the applicant's assessment methodology, particularly in relation to the treatment of distance thresholds and their influence on predicted effects. Notably, the applicant's written methodology in Appendix 16.1 does not specify any distance beyond which major effects are considered to cease. However, an independently prepared Evidence

Note, based entirely on the applicant's Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern across all three assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of the receptor's sensitivity or the extent of visibility.

Furthermore, the applicant's own documentation demonstrates that distance plays a significant role in shaping these judgements. For example, the assessment of a coastal area situated over 30 kilometres away concludes that, given the viewing distance, the scale of change is small. Similarly, the Landscape Character synthesis categorises magnitude of change as High within approximately 20 kilometres, Medium between approximately 20 and 30 kilometres, and Low beyond approximately 30 kilometres for certain landscape types. This gradation based on distance appears to systematically moderate the magnitude of effect as distance increases.

The consequence of this approach is that the protective tests are being applied to understated inputs. By moderating magnitude at the very distances where some of the most sensitive designated landscapes are situated, the conclusions reached fail to provide a reliable representation of the effects the Scottish Ministers are being asked to consent. This fundamental uncertainty in the assessment methodology undermines confidence in the accuracy and robustness of the predicted impacts on sensitive receptors.

The practical consequence of relying on the visualisation materials provided is that they may not accurately convey the true scale and impact of the proposed development as experienced on site. NatureScot's visualisation guidance, which the applicant follows, explicitly states that printed visualisations are unable to fully replicate the scale perceived by a viewer in the field. This limitation means that stakeholders and decision-makers reviewing the visual materials might underestimate or misinterpret the extent to which the development would be visible and affect the surrounding landscape.

Furthermore, the wireline drawings included within the same panoramic projections are bound by the same constraints as the accompanying photographic images. These wireline drawings serve as a technical rendering within the visualisation rather than acting as an independent corrective tool to address any deficiencies in the photographic representation. Consequently, these visual aids should be regarded with caution, as they do not provide a definitive or fully reliable depiction of the visual effects. This inherent limitation in the visual evidence advises careful consideration of on-site conditions and supplementary assessments when evaluating the visual impact of the proposal.

The 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.

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.

1.1.205 Cultural Landscape, Archaeology and Historic Environment

While the applicant's use of Historic Environment Scotland's recognised methodology ostensibly aligns with established standards for assessing effects on the setting of historic assets, a detailed examination reveals significant shortcomings that undermine the reliability of the assessment's conclusions regarding heritage impacts. The methodology in question, developed through consultation with Historic Environment Scotland, explicitly requires an evaluation of whether changes to setting affect the contribution that setting makes to the cultural significance of the 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. However, an independent Methodological Audit, relying solely on the applicant's Appendix 14.3, demonstrates that although the operational assessment identifies key 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 primarily describes aspects of visual change such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, before concluding—without the necessary evaluative analysis—that the integrity of setting is adequately retained. This absence of the essential evaluative step, mandated by the methodology, calls into question the validity of the applicant's findings and suggests that the assessment does not comply fully with required methodological standards.

The applicant's baseline assessment acknowledges that the cultural significance of the affected heritage assets extends beyond their physical presence, encompassing a range of experiential qualities. These include the historic practices of pilgrimage, arrival by sea, and movement through a living cultural landscape, as well as the interrelationships between monuments, spirituality, and the surrounding landscape and seascape. Importantly, this significance is understood to be experienced dynamically, through movement rather than from static viewpoints.

However, Historic Environment Scotland's consultation responses, as recorded within the application documentation, highlight concerns that these broader cultural and experiential qualities may not be fully captured by the applicant's assessment. Specifically, the statutory body has requested the inclusion of additional viewpoints to better represent these wider aspects, which are integral to understanding the heritage assets' true significance.

While the applicant has established a baseline that recognises the multifaceted nature of the cultural landscape, there remains some uncertainty as to whether the assessment comprehensively addresses the intangible and experiential values that contribute to the heritage assets' significance. Ensuring that these qualities are adequately considered is essential for a balanced and thorough evaluation of potential impacts.

The 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 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.

1.1.206 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 represents a potentially significant pathway through which the proposed development could impact island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 addresses impacts primarily at a regional scale, focusing in detail on potential port communities but failing to provide an equivalent place-based evaluation of the island communities directly facing the development. Notwithstanding this lack of targeted analysis, the assessment nonetheless concludes that those island communities exhibit low sensitivity to tourism effects.

This approach overlooks critical distinctions between small island economies and broader regional averages. Small island economies are concentrated in sectors that are particularly vulnerable to alterations in the qualities that attract visitors. Far from mitigating sensitivity, a reliance on increasing visitor numbers actually intensifies dependence on these at-risk qualities. Therefore, the conclusion of low sensitivity drawn without a place-based analysis cannot be regarded as evidence but must be seen as an unsubstantiated assumption.

Given these significant methodological shortcomings, the socio-economic assessment does not provide a reliable understanding of the potential impacts on island communities. A more nuanced, place-specific evaluation is necessary to accurately assess and mitigate the effects of the proposed development on these sensitive economies. Without this, the assessment falls short of informing appropriate planning decisions regarding the proposal's effects on island communities.

The proposal fails to comply with 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.

1.1.207 Ecology, Biodiversity and Habitats Regulations

The proposed development poses a significant risk to the ecological integrity of the site and its surrounding waters due to the presence of Priority Marine Features and Annex I habitats within the development area. These habitats are of recognised conservation importance and are known to support a range of sensitive species, including seabirds, marine mammals, and basking sharks. The introduction of large-scale construction, operational, and decommissioning activities over several decades would inevitably disturb these species and their habitats, potentially resulting in substantial adverse environmental effects. Given the ecological sensitivity and the scale and duration of the proposed activities, the environmental risks associated with the development are considerable and warrant thorough reconsideration.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan, specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. The preparation and presentation of these documents indicate a recognition by the applicant that there may be potential adverse effects on the integrity of this protected site as a result of the proposed development. Such documents are conventionally prepared and provided in circumstances where the possibility of an adverse effect cannot be definitively ruled out. The very inclusion of these materials in the application package is thus a significant feature, reflecting the applicant's acknowledgement of potential environmental impacts that warrant careful consideration.

Moreover, the submission of these derogation and compensation documents operates within the framework that the Scottish Ministers might ultimately reach a different conclusion regarding adverse effects than the applicant. This highlights a degree of uncertainty inherent in the assessment process and underscores the importance of these documents in addressing the requirements for derogation under relevant protection provisions. The compensation plan, focused on the guillemot population, seeks to mitigate potential harm to this protected species, aiming to offset any unavoidable impacts should the development proceed. In this context, the applicant's approach demonstrates an awareness of the statutory and policy obligations concerning protected sites and species, and an intention to comply with those obligations through appropriate mitigation and compensation measures.

The 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.

1.1.208 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 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.

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.

1.1.209 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 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.

1.1.210 Effects on Local Area

There remains considerable uncertainty regarding the adequacy of the applicant's assessment of the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Although Islay and Colonsay lie in closest proximity to the proposed development—which extends over a 448 square kilometre area immediately north-west of Islay and west of Colonsay—the application primarily addresses Islay in terms of its potential as a direct project location. This approach neglects a thorough, place-based evaluation of the impacts on Islay as a distinct island community, particularly its Atlantic-facing settlements that confront the nearest edge of the development zone, leaving potential effects on their setting, local economy, and community life insufficiently explored.

The situation is no less concerning for Colonsay and Oronsay, where the seaward outlook is integral to daily life and faces directly towards the development array. Notably, the North Colonsay and Western Cliffs Special Protection Area lies along Colonsay's coastline and forms the focus of the applicant's derogation case and compensation proposals. This area hosts an internationally protected seabird population, and the application itself acknowledges that harm to this resource cannot be excluded, highlighting a degree of unresolved risk and impact. Such an admission underscores the need for a more comprehensive and transparent assessment of the environmental consequences.

Furthermore, Oronsay Priory, a scheduled monument of national importance situated within this community's area, also demands closer scrutiny. The identified gaps in the heritage assessment apply equally to the evaluation of its open maritime setting, which forms a critical part of its historic significance. Taken together, these considerations demonstrate that the current environmental and heritage impact evaluation does not convincingly address all relevant effects on these islands, thereby undermining the reliability of the overall assessment and warranting further detailed and place-specific analysis.

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

The applicant's assessment acknowledges the potential 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 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.

While the applicant's assessment applies distance-based mitigation measures to certain seascape receptors, this approach fails to address significant effects experienced by mainland and island communities with direct views and economic dependence on the seascape. Notably, Gigha, a community-owned island emblematic of island regeneration, faces the development waters from the east; yet, the impact on its delicate community balance and local economy remains unexamined. Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas, precisely the receptors subject to the contested distance-based mitigation, have not been adequately

assessed. Furthermore, the west coast of Kintyre comprises a series of communities whose identity and visitor economy are intrinsically linked to the open Atlantic seaboard views towards Islay, Jura, and surrounding waters. The Treshnish Isles and adjacent small islands and mainland coasts sharing outlooks towards the development area are likewise excluded from comprehensive evaluation. This omission compromises the thoroughness of the applicant's environmental appraisal and undermines the reliability of conclusions regarding the seascape's wider social and economic sensitivities.

There remains 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.

1.1.211 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 624
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.

1.1.212 Seascape, Landscape and Visual Effects

There is an inherent uncertainty in relying on the visualisation materials submitted in support of this assessment. 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 fundamental limitation introduces doubt as to how accurately these materials convey the true visual impact of the proposed development.

Further complicating matters, the wireline drawings included within the panoramic visualisations share the same constraints as the accompanying photographs. These drawings are technical renderings embedded within the visualisation framework and do not serve as independent corrections or enhancements to the photographic evidence. As a result, they cannot be regarded as fully reliable substitutes for direct field observation.

Given these acknowledged technical and perceptual limitations, it is appropriate to approach the visual evidence with caution. The reliance on such materials should not be regarded as providing definitive clarity on the visual effects, and further consideration of their shortcomings is necessary before reaching any firm conclusions.

When considering the impact of the proposed development on the night-time seascape, it is important first to evaluate the potential for mitigation of lighting effects. Aviation and navigation lighting, as proposed, would introduce permanent illumination to an area of sea horizon currently devoid of such lighting. This unlit character is a defining feature of the existing night-time seascape and contributes significantly to its visual and experiential qualities. Mitigation measures may reduce some direct glare or light spill, but the fundamental alteration of the seascape's character due to the presence of fixed lights cannot be fully eliminated.

The proposal would result in the continuous presence of aviation and navigation lighting over a stated operational life of 35 years. This duration, while finite, represents a substantial period during which the seascape would be irrevocably changed. It should be noted that, from a policy perspective, this temporal limit does not negate the harm caused. The decision to grant consent effectively endorses the suitability of this seascape for wind farm use, including the acceptance of lighting impacts as an inherent consequence.

In balancing these considerations, it is clear that while mitigation may lessen some adverse effects, the permanent introduction of night-time lighting fundamentally transforms the character of the seascape. This transformation carries significant weight in the planning balance, requiring careful reflection on the acceptability of such change within the wider policy context.

The applicant'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.

1.1.213 Cultural Landscape, Archaeology and Historic Environment

The assessment finds that the applicant's baseline acknowledges the cultural significance of the affected heritage assets as deriving from a range of qualities, notably pilgrimage, arrival by sea, movement through a living cultural landscape, interrelationships between monuments, spirituality, and the encompassing landscape and seascape. These attributes are experienced dynamically through movement rather than from static viewpoints. However, there is concern that these broader

cultural and experiential dimensions may not be fully captured within the applicant's assessment framework.

Further to this, Historic Environment Scotland, as recorded in the consultation responses within the application, has requested the inclusion of additional viewpoints to ensure that these wider cultural landscape qualities are adequately represented. This underscores the importance of adopting a more comprehensive approach to heritage impact assessment, one that fully reflects the spatial and experiential context underpinning the significance of the heritage assets in question.

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 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.

1.1.214 Effects on Island Communities, Tourism and the Local Economy

The proposal poses a direct threat to the fundamental economic and social sustainability of the island communities in question by undermining the very qualities that attract visitors. These communities rely exceptionally heavily on visitors, who are drawn by attributes explicitly identified in the applicant's own baseline assessments:

landscape, seascape, cultural heritage, tranquillity, and remoteness. Any alteration to these intrinsic qualities would strike at the core of the islands' economic foundation, which in turn supports essential local services, sustains population levels, and ensures the long-term viability of these communities. Consequently, the proposed development jeopardises the enduring welfare and resilience of the island populations by diminishing the visitor appeal upon which they depend.

The applicant's 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 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.

1.1.215 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, with the surrounding waters providing habitat for seabirds, marine mammals, and basking sharks. The proposed project would introduce construction, operational, and decommissioning activities into this ecologically sensitive environment on a very large scale and over several decades. Given the presence of these protected species and habitats, the potential for significant adverse environmental effects is considerable, necessitating careful assessment and mitigation measures to safeguard the ecological integrity of the site and its marine surroundings.

The 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 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.

1.1.216 Cumulative and In-Combination Effects

The cumulative impact assessment relies fundamentally on the findings presented in the broader Environmental Impact Assessment. As established, the baseline evaluations concerning landscape, heritage, and socio-economic factors have been shown to understate the actual effects. Consequently, the cumulative assessment is predicated on this diminished baseline, which inherently weakens the accuracy of its conclusions.

Given that the baseline conditions themselves are underestimated, the resulting cumulative assessment inevitably undervalues the combined effects arising from this proposal alongside existing, consented, and foreseeable developments. This flawed foundation renders the cumulative impact assessment unreliable and fails to capture the true scale of potential harm. Therefore, the assessment cannot be considered a sound basis for decision-making in this context.

1.1.217 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 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.

1.1.218 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 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 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 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 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 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.

1.1.219 Personal Observations

In addition to the planning matters above, I am personally concerned because: This area is one of the most wild and beautiful places in the world. If the proposed wind farm is given consent, it would absolutely ruin this beautiful place forever. As a regular visitor to the area, I am deeply upset about how this proposal would affect the beauty and character of this place if it were to gain consent.

Based on my own local knowledge, I also wish to highlight that: The following should receive greater consideration: impact on seabirds such as the puffins on Staffa, impact on tourism and the people who rely on tourism for their living, the visual impact of these enormous turbines.

Finally, I would also ask the Scottish Ministers to consider: I would like the Scottish Ministers to take into account the special, unique and irreplaceable nature of these Scottish islands which would be so affected by the proposal.

1.1.220 Further Comments

I believe this proposal is disrespectful to Scotland and the Scottish people, who rightly hold the islands and coastlands of the Inner Hebrides with such affection.

1.1.221 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 625
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.

1.1.222 Legislative and Policy Framework

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

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

cannot be considered to meet the legal threshold for approval. The failure to properly address these statutory obligations constitutes a significant procedural and substantive defect that must result in the refusal of consent.

The marine licence application under consideration is 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 applicant's submission is therefore subject to a statutory assessment against 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 (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).

A thorough examination of the application reveals that compliance with these policies has not been demonstrated. The evidence submitted fails to adequately address the requirements of GEN 4 regarding co-existence, which is critical to ensuring that the proposed development does not adversely affect existing marine users or activities. Furthermore, the application lacks sufficient assessment and mitigation measures concerning the historic environment as required by GEN 6 and the associated paragraphs 4.22 to 4.23. This omission raises concerns about potential adverse impacts on heritage assets within the marine area.

Similarly, the application does not satisfactorily demonstrate compliance with GEN 7 and paragraph 4.28, which protect landscape and National Scenic Areas. The absence of robust landscape impact assessments undermines the statutory requirement to safeguard these designated areas. In relation to natural heritage, the application falls short of meeting the standards set out in GEN 9, with insufficient evidence to confirm that the proposal will not harm protected species or habitats.

The procedural requirements under GEN 18 concerning engagement have not been fully met, as the application does not provide clear evidence of effective consultation with relevant stakeholders, which is essential for informed decision-making. Additionally, the evidence base supporting the application is deficient in accordance with GEN 19 and paragraph 4.81, which mandate the use of sound evidence. The lack of comprehensive, reliable data compromises the integrity of the assessment process.

Finally, the application does not adequately consider cumulative impacts as required by GEN 21 and paragraph 4.85. Without a thorough cumulative impact assessment, the potential for significant adverse effects arising from the proposal in combination with other existing or planned developments remains unaddressed.

Given these identified deficiencies, omissions, and conflicts with the applicable legal and policy framework, the application fails to meet the statutory requirements for marine licence determination under the Marine (Scotland) Act 2010 and the National Marine Plan. In accordance with the established policy that where compliance has not been demonstrated, these matters weigh against the granting of consent, it is concluded that the marine licence application should 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 must be considered in light of the statutory requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations, which mandate that any proposal's likely significant environmental effects be thoroughly identified, assessed, and reported prior to determination. This legal framework ensures that decision-makers have a comprehensive understanding of potential environmental impacts before granting consent. However, the evidence before the authority does not demonstrate that these requirements have been fully met in this case.

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 critical to safeguard designated habitats and species from adverse impacts arising from development. The applicant's documentation fails to provide sufficient evidence that these statutory tests have been properly applied or that the proposal's effects on protected sites have been adequately evaluated. This omission represents a significant procedural and substantive deficiency in the application.

Given these shortcomings, the absence of demonstrated compliance with both the Environmental Impact Assessment Regulations and the Habitats Regulations constitutes a material failure in the application process. Where such compliance has not been established, or where evidence reveals deficiencies, omissions, or conflicts with the relevant legal and policy framework, these factors must weigh decisively against the granting of consent. Accordingly, the proposal should not be approved in its current form.

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

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

1.1.223 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.

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 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.

1.1.224 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 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 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 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.

1.1.225 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 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 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 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.

1.1.226 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 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 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.

1.1.227 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 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.

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 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.

1.1.228 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 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.

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.

1.1.229 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.

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.

1.1.230 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 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 overlooks significant impacts on key designated landscapes and vulnerable island communities, thereby undermining the protection of their natural and cultural qualities. Ulva, situated within the Loch na Keal National Scenic Area, is a community-owned island undergoing regeneration, reliant on the unspoilt seascape and setting that are at risk; yet, no assessment of effects on Ulva has been undertaken. Staffa, also within the same National Scenic Area and renowned across Europe, lies approximately 35 kilometres from the development site—beyond the 30-kilometre range recommended by NatureScot for assessment of National Scenic Area qualities. Despite acknowledging the panoramic maritime character of Staffa, the applicant concludes that effects would be small and not significant, a conclusion that appears to underestimate the island's sensitivity. Similarly, the Jura National Scenic Area, designated for its wild and undeveloped

Atlantic outlook, is assessed only as having medium to low magnitude effects at 28 to 32 kilometres, based largely on distance and retained landforms, which does not fully reflect the importance of its wild character. The Scarba, Lunga and Garvellachs National Scenic Area, at 35 to 40 kilometres, is treated in the same way, further indicating a consistent underestimation of effects on these important landscapes.

The applicant's assessment 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.

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

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

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

The applicant's environmental impact assessment systematically applies a distance-based approach that moderates and discounts effects beyond approximately 20

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

1.1.231 Personal Observations

In addition to the planning matters above, I am personally concerned because: As a community economic development professional, I believe all the proposals need to go through proper channels, especially place based Initiatives in Scotland

Finally, I would also ask the Scottish Ministers to consider: Community wealth building should be more considered as it is a new Bill, addressing these issues.

1.1.232 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 626
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.

1.1.233 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 fails to comply with the statutory requirements set out in Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland's National Marine Plan. Authorisation decisions under this legislation must be taken in accordance with the National Marine Plan unless relevant considerations indicate otherwise. 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 form an integral part of the statutory assessment process for the application.

The evidence identifies deficiencies and omissions in the application's adherence to these policies, resulting in conflicts with the applicable legal and policy framework. As compliance with these policies has not been demonstrated, the application does not meet the statutory test required for authorisation. Consequently, these shortcomings weigh decisively against the granting of consent.

In conclusion, the marine licence application is deficient in meeting the statutory and policy requirements of the Marine (Scotland) Act 2010 and the National Marine Plan. This failure to demonstrate compliance justifies refusal of the licence.

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

1.1.234 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 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.

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.

1.1.235 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.

The practical consequence of relying on the visualisation materials submitted with the application is that they cannot 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

fall short in conveying the true scale perceived by a viewer in the field. This limitation affects the ability of decision-makers and the public to fully appreciate the extent of visual change.

Furthermore, the wireline drawings included within the panoramic visualisations share the inherent constraints of the photographic base images. Rather than serving as an independent means to correct or clarify the photographic visuals, these wirelines are technical renderings embedded within the overall visualisation. Consequently, they do not overcome the fundamental shortcomings of the photographs in representing the development's scale and context.

In light of these acknowledged technical and perceptual limitations, the visual evidence should be treated with caution when assessing the proposal's visual effects. Decision-makers must recognise that the submitted materials provide only an approximate impression and do not substitute for a comprehensive understanding derived from site visits and other forms of 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.

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.

1.1.236 Cultural Landscape, Archaeology and Historic Environment

There remains uncertainty as to whether the applicant's assessment fully captures the broader cultural landscape and experiential qualities that underpin the heritage significance of the affected assets. Although the applicant's own baseline acknowledges that this significance arises from 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, these aspects are complex and not easily distilled into conventional fixed viewpoints.

This complexity is highlighted by Historic Environment Scotland's consultation responses, as recorded within the application, which requested additional viewpoints

to better represent these wider qualities. Their input suggests that the assessment as presented may not yet provide a comprehensive understanding of how heritage values are experienced in context, particularly through movement and interaction with the environment rather than static observation.

Given these considerations, it is important that the evaluation of heritage impacts reflects the full cultural significance as described, including the dynamic and experiential dimensions, to ensure that any potential adverse effects are properly understood and addressed. Further clarification and enhancement of the assessment would be prudent at this stage.

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.

1.1.237 Effects on Island Communities, Tourism and the Local Economy

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.

1.1.238 Ecology, Biodiversity and Habitats Regulations

The proposed development site encompasses Priority Marine Features and Annex I habitats, which are recognised for their ecological sensitivity and conservation importance. These designations indicate habitats that are critical for the maintenance of marine biodiversity and are afforded protection under relevant environmental policies. The surrounding waters additionally provide habitat for protected species, including seabirds, marine mammals and basking sharks, all of which contribute to the ecological value of the area. While mitigation measures may be proposed to reduce adverse effects, the scale and duration of construction, operation and decommissioning activities—extending over decades—pose significant challenges to effectively safeguarding these sensitive features.

In comparison to typical mitigation strategies, the magnitude of the proposed development's environmental footprint within this marine environment raises concerns regarding residual impacts. The large-scale, long-term nature of the activities may limit the effectiveness of conventional mitigation, potentially resulting in significant adverse environmental effects. Given the presence of Priority Marine Features and protected species within and around the site, careful reconsideration of the development's scope, timing and mitigation approach is necessary to ensure compliance with environmental protection standards and to prevent irreversible harm to these important ecological assets.

The applicant'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 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 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.

1.1.239 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 heavily on baseline evaluations that have already been demonstrated to understate the effects on landscape, heritage, and

socio-economic factors. Given that the foundational Environmental Impact Assessment adopts this reduced baseline, any subsequent cumulative analysis necessarily inherits these limitations. As a result, the combined effects of the proposed development alongside other existing, consented, and foreseeable projects are inherently undervalued.

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

The applicant's submission 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.

1.1.240 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.

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.

1.1.241 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 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 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 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 of the South Tiree coastal area identifies this location as having a High sensitivity at a distance of approximately 35 kilometres, yet attributes a Low magnitude of change to the proposed development. This characterisation appears to significantly understate the true impact, given the sensitivity rating assigned. The designation of High sensitivity underscores the importance of the

receptor landscape and suggests that any change, particularly of a visually intrusive nature, would be more pronounced and consequential.

Tiree's landscape is exceptionally low-lying and defined predominantly by its expansive sea and sky, with its highest elevation, Ben Hynish, reaching only 141 metres. The island's distinctive character rests on its open oceanic horizon, which has remained free from vertical structures of any significant scale. The introduction of turbines reaching heights of up to 335 metres would thus represent an unprecedented vertical intrusion into this seascape. Given this context, the conclusion that the magnitude of change would be Low does not appear to reflect the reality of the receptor's exposure or sensitivity. Consequently, the applicant's evaluation underestimates the scale of visual and landscape effects on Tiree, leading to an unreliable assessment that fails to fully acknowledge the distinctive and sensitive nature of this island setting.

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 systematically reduces the significance of environmental effects on highly sensitive receptors located beyond approximately 20 kilometres by moderating the magnitude of change and discounting the resultant impact. This approach results in a complete absence of place-specific evaluation for the communities affected at these distances. Such systematic underestimation undermines the integrity of the environmental impact assessment, as it fails to adequately recognise and address the genuine effects experienced by these distant yet sensitive receptors. Consequently, the assessment cannot be regarded as comprehensive or robust in its appraisal of impacts beyond the 20-kilometre threshold.

1.1.242 Personal Observations

In addition to the planning matters above, I am personally concerned because: I have friends who live on Colonsay and have often visited the island and have also visited beautiful, tranquil Oronsay Priory.
The damage to wildlife and the seabed, the visual intrusion and light pollution that will be created by this development is truly horrifying.

Based on my own local knowledge, I also wish to highlight that: I lived in Kintyre for 20 years and love the view up the West coast of Kintyre where you can see as far as Ben More on Mull. A forest of giant wind turbines would be detrimental to the aesthetic of this magnificent vista.
The dark skies such as those of Colonsay are an increasingly rare pleasure that should be protected.
Iona is an internationally important spiritual centre and should be saved from this windfarm development.

Finally, I would also ask the Scottish Ministers to consider: Wildlife habitats in Argyll are being sacrificed at an alarming rate to windfarm developments.
I watched in horror as my beloved Crossaig on Kintyre was turned into an industrial site with substation, subsea cable and windfarms the length of the peninsula.
Golden eagles, Red Throated and other Divers, abundant amphibians, otters, red squirrels, pine marten, fresh water mussels; all were present around Crossaig and now many are reduced or absent.
It is time the interests of foreign shareholders were given less importance than our own natural environment and heritage.
The cumulative effect of all these developments amounts to a holocaust on wildlife in Argyll and I believe Scottish Ministers should look at this cumulative effect on Argyll as well as this latest proposal.

1.1.243 Further Comments

If our hubris had not led us to presume that economic growth and development were possible ad infinitum, and that the financial priorities of the human species should take precedence over all consideration for other beings, the planet would not be in the mess it is now.

1.1.244 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy obligations governing its determination. The applicant’s own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the local communities and heritage of the coastal area. However, independent scrutiny of the submitted documents reveals that these impacts have been understated, with a critical heritage assessment conspicuously absent. Furthermore, while the effects on the island communities affected by the development were acknowledged, no comprehensive assessment of these impacts has been undertaken. In addition, the ecological tests required by policy have not been demonstrated as achievable. It is also pertinent to note that the application before the Scottish Ministers pertains only to a portion of the overall project.

Given these substantial shortcomings, it is urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm and reject the related marine licence application. Should the Ministers consider otherwise, it is requested that the applicant be required to provide further environmental information alongside enhanced visualisations. Moreover, any decision should be deferred until after a public inquiry, affording a thorough examination of the concerns raised in this objection. Regardless of the outcome, it is further requested that the Ministers issue explicit conclusions within their decision statement concerning the project's effects on cultural heritage and on the impacted island communities.

Yours faithfully,

[Redacted]

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

Member of the public 627
Dear Sir/Madam,

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

The proposal concerns the construction of an offshore wind farm with a generating capacity in the region of 2 gigawatts. The development envisages between 91 and 144 turbines, each with a maximum height of up to 335 metres to blade tip. This facility would occupy a Windfarm Development Area extending over approximately 448 square kilometres of sea, located north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in proximity to the islands and coastal settlements of the southern Hebrides.

The following analysis outlines my objections grounded in planning and environmental considerations, assessed against the pertinent statutory and policy frameworks governing the determination of these applications. It is important to emphasise that the onus lies squarely with the applicant to furnish sufficient evidence demonstrating compliance with the applicable tests. Objectors carry no obligation to prove the contrary. Upon careful evaluation of the evidence presented, it is clear that the applicant has failed to meet this burden, and accordingly, the applications should be refused consent.

1.1.245 Seascape, Landscape and Visual Effects

The assessment acknowledges a fundamental limitation in the visualisation materials provided to support the evaluation. NatureScot's visualisation guidance, which the applicant follows, explicitly states that printed visualisations are unable to fully replicate the true scale experienced by a viewer in the field. This inherent shortcoming means that the photographic representations cannot wholly convey the visual impact as it would be perceived on site.

Furthermore, the wireline drawings included within the same panoramic projections share these limitations. Rather than serving as an independent corrective, they function as technical renderings within the visualisation framework and are therefore subject to the same constraints as the accompanying photography. This acknowledgement underlines the need for careful interpretation of the visual evidence when assessing the potential effects.

The assessment finds that the proposed development would introduce aviation and navigation lighting to a previously unlit sea horizon, resulting in a permanent alteration of the night-time seascape character for the duration of the 35-year operational life. This change is significant because the current absence of such lighting contributes to the existing character and visual quality of the seascape. Furthermore, it is important to recognise that the 35-year operational period does not mitigate the policy harm identified; consenting to this development effectively

designates the seascape as appropriate for wind farm use, with all associated impacts. In conclusion, the introduction of lighting represents a substantive and lasting change to the night-time seascape, which must be carefully weighed against policy objectives before granting consent.

1.1.246 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment methodology, while formally adopting Historic Environment Scotland's recognised approach, ultimately fails to fulfil the essential evaluative requirements set out therein. The methodology expressly mandates that any assessment of effects on the setting of historic assets must consider not only visual changes but also the extent to which these changes affect the contribution that setting makes to the cultural significance of the heritage asset, with particular emphasis on whether the integrity of that setting is retained. Importantly, it clarifies that visual change alone should not be equated directly with adverse impact. This nuanced approach necessitates a clear demonstration of how the integrity of setting has been evaluated in the context of the proposed development's effects.

However, a Methodological Audit, conducted independently and based exclusively on the applicant's Appendix 14.3, reveals a significant shortcoming in this respect. While the operational assessment identifies relevant heritage attributes and provides a detailed description of visual changes—covering aspects such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—it stops short of the critical analytical step required by the adopted methodology. The audit finds no evidence that the assessment explicitly evaluates how these visual changes influence the integrity of setting or the contribution setting makes to cultural significance, as mandated. Instead, the assessment concludes that the integrity of setting is adequately retained without demonstrating the reasoning or analysis that supports this conclusion. Consequently, this omission undermines the reliability of the applicant's conclusions regarding heritage impacts, casting doubt on the robustness of the overall assessment.

The practical consequence of the applicant's 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 the deficiencies identified in the landscape assessment is that the heritage impact conclusions drawn from it lack credibility. Since the heritage conclusions are explicitly dependent on the landscape

assessment, any understatement of landscape effects directly translates into an understatement of heritage effects. This linkage means that the overall assessment fails to accurately represent the true extent of harm to heritage assets.

The reliance on a flawed landscape assessment creates a cascading effect in the evaluation process. When landscape effects are understated, as demonstrated above, the heritage conclusions that build upon them inevitably inherit the same shortcomings. This results in an overall assessment that does not fully acknowledge or address the potential adverse impacts on the historic environment, thereby undermining the robustness of the planning evidence base.

In light of these concerns, it is essential that the assessment methodology and findings be revisited to ensure that landscape effects are accurately and comprehensively evaluated. Without rectifying these deficiencies, the heritage impact conclusions remain fundamentally compromised, weakening the justification for the proposed development in terms of its effects on heritage assets.

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.

1.1.247 Effects on Island Communities, Tourism and the Local Economy

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

The applicant’s own consultants acknowledged that habitability represents a potentially significant pathway through which the proposed development could impact island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 addresses impacts primarily at a regional scale, focusing in detail on potential port communities but failing to provide an equivalent place-based evaluation of the island communities directly facing the development. Notwithstanding this lack of targeted analysis, the assessment nonetheless concludes that those island communities exhibit low sensitivity to tourism effects.

This approach overlooks critical distinctions between small island economies and broader regional averages. Small island economies are concentrated in sectors that are particularly vulnerable to alterations in the qualities that attract visitors. Far from mitigating sensitivity, a reliance on increasing visitor numbers actually intensifies dependence on these at-risk qualities. Therefore, the conclusion of low sensitivity drawn without a place-based analysis cannot be regarded as evidence but must be seen as an unsubstantiated assumption.

Given these significant methodological shortcomings, the socio-economic assessment does not provide a reliable understanding of the potential impacts on island communities. A more nuanced, place-specific evaluation is necessary to accurately assess and mitigate the effects of the proposed development on these sensitive economies. Without this, the assessment falls short of informing appropriate planning decisions regarding the proposal's effects on island communities.

The proposal fails to 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.

1.1.248 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 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 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.

1.1.249 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 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.

1.1.250 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 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 leads to practical consequences that risk undervaluing the true extent of impacts on the Ross of Mull South coastal area and its communities. Although significant effects are acknowledged at Erraid and along the Core Paths of the Ross, as well as at Fionnphort—the critical gateway to Iona and primary embarkation point for visitors—the assessment assigns only a Medium magnitude to these changes despite recognising the high sensitivity of the area at distances of 22 to 24 kilometres. This approach fails to adequately reflect the

importance of Fionnphort, whose community is intimately linked to the flow of visitors, and which would therefore experience material socio-economic and experiential effects.

Across Mull more broadly, the applicant concedes significant effects on Core Paths and within the Central, South and West Mull Local Landscape Area, as well as on the Loch na Keal National Scenic Area, which is of High sensitivity throughout a zone extending 21 to 33 kilometres. Yet, no higher than a Medium magnitude is attributed to these impacts. Moreover, the applicant's reliance on distance-based criteria, exemplified by the dismissal of effects around the Wilderness and Gribun Rocks coastal area due to viewing distances exceeding 30 kilometres, inadequately captures the scale of change. This is particularly concerning given that Mull's west-facing tourism economy—including wildlife boat operations and accommodation services—depends heavily on the integrity of the Atlantic seascape, which the proposed development would industrialise. Notably, no place-based assessments have been conducted for these western communities, leaving a significant gap in understanding the full extent of potential economic and landscape consequences.

While the applicant's assessment acknowledges some 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 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 directly face the development site and whose economies depend heavily on the seascape. For instance, Gigha, a community-owned island emblematic of island regeneration, looks eastward across the waters towards the proposed development. The finely balanced social and economic fabric of this island has not been examined, leaving a critical gap in understanding the full implications of the proposal.

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 receptors to which the applicant’s distance-based mitigation approach, as identified in this objection, is applied. Ignoring the quality and significance of these views undermines the robustness of the visual and economic impact assessment.

Furthermore, the communities along the west coast of Kintyre, whose outlook and visitor economy are intrinsically linked to the open Atlantic seaboard towards Islay, Jura, and surrounding waters, have not been adequately considered. The Treshnish Isles and other small islands and mainland coasts sharing views towards the development area are similarly excluded. This absence compromises the comprehensiveness of the assessment and fails to account for the potential widespread effects on these interconnected communities.

1.1.251 Personal Observations

In addition to the planning matters above, I am personally concerned because: I have been to Iona twice, travelling from Canada.
It is a holy place and does not need to be desecrated by such a project.

Based on my own local knowledge, I also wish to highlight that: Of course! All of the above.

Finally, I would also ask the Scottish Ministers to consider: There are many places in Scotland where wind turbines would not be visible.

1.1.252 Further Comments

If it is really a necessary means of feeding the grid for Scotland please put the wind farm in an unpopulated area.

1.1.253 Summary

The proposal before the Scottish Ministers fails to satisfy the statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities of the coastal area. Furthermore, analyses of the applicant's documentation reveal that the extent of these impacts has been understated. Crucially, the mandatory heritage assessment has not been completed. While the effects on the island communities affected by the development were identified, no assessment of these impacts has been undertaken. Additionally, the ecological criteria required by relevant legislation have not been demonstrated as achievable. It is also notable that the application submitted represents only a portion of the overall project intended for Scottish Ministers' consideration.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm proposal and to reject the associated marine licence. Should the Ministers consider granting approval, it is requested that they require the submission of further environmental information and enhanced visual representations. Moreover, determination of the applications should only proceed following a public inquiry, enabling a thorough examination of the concerns raised in this objection. Regardless of the decision reached, I ask that the Ministers provide clear and reasoned conclusions regarding the impacts on cultural heritage and the affected island communities within their final statement.

Yours faithfully,

[Redacted]

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

Member of the public 628
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.

1.1.254 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 has not shown that reasonable steps have been taken to mitigate adverse effects arising from the proposal on these interests. As the Scottish Ministers are also required to have regard to these duties in determining the application, the identified deficiencies and omissions in addressing these statutory requirements 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 proposal fails to demonstrate compliance with the mitigation requirements set out in National Planning Framework 4, particularly in relation to Policies 3, 4, 7, and 11. Despite the clear statutory duties and legislative requirements that accompany these policies, the application does not provide sufficient evidence to show that biodiversity impacts will be adequately addressed, that natural places will be protected, that historic assets and places will be conserved, or that energy considerations meet the necessary standards. This lack of demonstrated mitigation undermines the proposal's conformity with the Framework's objectives.

National Planning Framework 4 is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. The proposal engages multiple policies within the Framework—specifically Policy 3 on Biodiversity, Policy 4 on Natural Places, Policy 7 on Historic Assets and Places, and Policy 11 on Energy. However, the application contains deficiencies and omissions in addressing these policies, failing to meet the Framework's requirements. These shortcomings represent a clear conflict with the applicable legal and policy framework.

Where compliance has not been demonstrated, or where evidence identifies deficiencies, omissions, or conflicts with the legal and policy framework, these matters weigh against the granting of consent. In this case, the proposal's failure to satisfy the key policies of National Planning Framework 4 relevant to biodiversity, natural places, historic assets, and energy is a material consideration that must lead to refusal. The application does not meet the necessary standards to justify approval under the Framework.

The applicant's submission fails to meet the fundamental legal requirements for environmental assessment and habitats protection as mandated by the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations. These regulations explicitly require that the

likely significant environmental effects of any proposed development be thoroughly identified, assessed, and reported prior to any determination. In this case, the Environmental Impact Assessment (EIA) documentation provided is demonstrably inadequate, lacking the comprehensive analysis necessary to ascertain the full scope of environmental consequences. This deficiency undermines the statutory purpose of the EIA process, which is to inform decision-makers and the public of potential adverse effects and to enable appropriate consideration and mitigation.

Furthermore, the proposal does not comply with the Habitats Regulations, which impose a statutory duty to assess the effects of the development on European protected sites through an appropriate assessment process. The evidence submitted fails to demonstrate that the proposal has undergone the requisite Habitats Regulations Assessment (HRA) in accordance with the applicable statutory tests. Without this assessment, it is impossible to conclude that the development will not adversely affect the integrity of protected habitats, a prerequisite for lawful consent under the Conservation of Habitats and Species Regulations.

The absence of a robust and compliant EIA and HRA represents a clear procedural and substantive failure. The statutory framework is unequivocal in its requirements, and where compliance has not been demonstrated, or where evidence reveals deficiencies, omissions, or conflicts with the legal and policy framework, these shortcomings must weigh decisively against the granting of consent. The current application does not satisfy these essential legal obligations, thereby rendering any approval premature and unlawful.

In conclusion, the proposal's failure to provide an adequate environmental impact assessment and to comply with the Habitats Regulations constitutes a fundamental breach of statutory requirements. This failure alone justifies refusal of consent, as the necessary information to ensure protection of the environment and European protected sites has not been furnished. The application should therefore be rejected on these grounds.

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

Given that compliance with the Islands (Scotland) Act 2018 has not been demonstrated, and that the evidence identifies omissions and conflicts with the applicable legal and policy framework, these shortcomings must weigh decisively against the granting of consent. The failure to properly consider and weigh the interests of island communities undermines the legality and soundness of the proposal's assessment, rendering the application unacceptable in planning terms. Consent should therefore be refused on this basis.

The 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.

1.1.255 Conflict with National Planning Framework 4 and the Development Plan

There remains considerable uncertainty as to whether the proposal complies with the impact criteria set out in National Planning Framework 4 (NPF4) Policy 11. While the policy expressly supports renewable energy development, such support is contingent upon adherence to specific impact tests, notably those concerning effects on communities and the environment. This conditional approach means that renewable energy initiatives must operate within the parameters established by Policy 11, rather than overriding them.

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

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

The proposal fails to comply with multiple policies within the National Planning Framework 4 (NPF4) that collectively safeguard nationally important landscapes, heritage assets, and biodiversity. Policy 11 operates in conjunction with Policy 4(c) and 4(d), which specifically protect National Scenic Areas and nationally important landscapes from significant adverse effects on the characteristics for which they are designated. Additionally, Policy 7 addresses the protection of scheduled monuments and the settings of historic assets, with particular reference to Policies 7(h), 7(c), and 7(d). Policy 3 further outlines the requirements for the conservation of biodiversity. Taken together, these policies establish a comprehensive framework intended to ensure that developments do not undermine the integrity of nationally significant environmental and cultural resources.

An assessment of the proposal against these policies reveals clear conflicts. It would result in significant adverse effects on nationally designated landscapes and seascapes, contrary to the protections afforded by Policies 4(c) and 4(d). Furthermore, the submission has not demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, thus failing to satisfy the requirements of Policy 7. The safeguarding of island communities, which is also a consideration under these policies, has not been assured. Finally, the ecological

tests required under Policy 3 have not been evidenced as being capable of compliance based on the material submitted. Consequently, the proposal does not meet the standards set out in these relevant NPF4 policies and cannot be supported.

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.

1.1.256 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.

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 acknowledges that the proposed development results in effects which engage National Planning Framework 4 (NPF4) Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as policies GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively aim to safeguard nationally important landscapes and seascapes by ensuring that developments are carefully assessed for their impact on these valued environments.

However, the applicant has failed to demonstrate that its assessment of the scale of these accepted effects aligns with the methodology it has employed. Furthermore, there is no adequate evidence to show compliance with the policies designed to protect nationally significant landscape and seascape interests. This shortcoming raises significant concerns regarding the proposal's conformity with the established planning framework and suggests that the development would not meet the requisite standards for environmental protection set out in the relevant policies.

1.1.257 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 under consideration derives from a range of qualities extending beyond the physical structures themselves. These include aspects such as pilgrimage traditions, arrival by sea, and movement through a living cultural

landscape. The relationships between monuments, spirituality, and the surrounding landscape and seascape are highlighted as fundamental to the heritage value, with an emphasis on experiential qualities encountered through movement rather than solely from fixed viewpoints. This recognition underscores the complex and dynamic nature of the heritage assets' cultural significance.

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

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

The practical consequence of deficiencies in the landscape assessment is a corresponding undermining of the credibility of the heritage impact conclusions. As the heritage conclusions rely directly on the findings of the landscape assessment, any understatement of landscape effects necessarily transfers to the heritage analysis. This interdependence means that if landscape effects are not fully or accurately recognised, the subsequent heritage impact conclusions will similarly underestimate the true extent of harm. Therefore, the validity of the heritage conclusions is compromised by the initial shortcomings in the landscape evaluation, calling into question the robustness of the overall impact assessment.

The application 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.

1.1.258 Effects on Island Communities, Tourism and the Local Economy

The proposal poses a direct threat to the fundamental economic and social sustainability of the island communities in question by undermining the very qualities that attract visitors. These communities rely exceptionally heavily on visitors, who are

drawn by attributes explicitly identified in the applicant's own baseline assessments: landscape, seascape, cultural heritage, tranquillity, and remoteness. Any alteration to these intrinsic qualities would strike at the core of the islands' economic foundation, which in turn supports essential local services, sustains population levels, and ensures the long-term viability of these communities. Consequently, the proposed development jeopardises the enduring welfare and resilience of the island populations by diminishing the visitor appeal upon which they depend.

The 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 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.

1.1.259 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 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 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.

1.1.260 Cumulative and In-Combination Effects

There is considerable uncertainty surrounding the current approach to assessing the proposed project, as only a portion of it is presently before the Scottish Ministers. Crucially, the export cable corridor and the onshore transmission works—integral components without which the wind farm cannot function—have been deferred to separate, later applications. This fragmentation means that the full scope of the project's impacts is not being evaluated in a single, comprehensive process.

The consequence of this piecemeal approach is that significant elements of the development will be subject to subsequent consenting processes that occur after the principal decision on the wind farm itself has been made. Such a method prevents the decision-makers from having a complete understanding of the cumulative effects of the entire proposal at the time they grant consent. This is particularly problematic because it obscures the true scale and nature of the project's environmental and operational impacts.

This approach is inconsistent with established legal principles, as affirmed in the Raeshaw Farms case, which emphasises that a project must be assessed as a whole rather than being artificially divided into smaller parts whose individual effects may seem less significant. To ensure a lawful and thorough evaluation, the entire development, including all essential infrastructure, must be considered together. Without this comprehensive assessment, the current process is fundamentally flawed and risks overlooking critical issues.

The 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.

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.

1.1.261 Public Engagement, Site Selection and Environmental Information

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.

1.1.262 Effects on Local Area

There is significant uncertainty regarding the adequacy of the applicant's assessment of the direct and substantial effects 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 as a potential project location rather than evaluating it as an affected island community. 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 provided to address the impact on their setting, local economy, or community life.

The situation for Colonsay and Oronsay is equally concerning. These islands' daily lives are defined by their seaward outlook, which faces directly towards the proposed array. The North Colonsay and Western Cliffs Special Protection Area, forming Colonsay's own coastline, is central to the applicant's derogation case and compensation plan. This represents the clearest admission within the application that harm to the internationally protected seabird population inhabiting these cliffs cannot be ruled out, underscoring the potential for significant environmental impact.

Furthermore, Oronsay Priory, a scheduled monument of national importance located within this community's area, has not been adequately considered. The identified gaps in the heritage assessment apply fully to the treatment of the priory's open maritime setting. Taken together, these omissions and uncertainties undermine the reliability of the overall environmental and heritage impact evaluation presented in the application.

The applicant's Coastal Character assessment recognises the Sound of Iona as an area of high sensitivity, 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 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 appears to underestimate or omit significant effects on several important designated landscapes and vulnerable island communities, thereby undermining the protection of their natural and cultural qualities. While some mitigation measures are proposed, a detailed comparison reveals shortcomings in addressing the specific sensitivities and contexts of these areas. Ulva, for example, lies within the Loch na Keal National Scenic Area and is a community-owned island at the beginning of its regeneration. This small, re-establishing community relies heavily on the unspoilt seascape and setting, yet no assessment has been made of the effects on Ulva, despite it sharing in full the impacts on the wider National Scenic Area. This omission is particularly concerning given the community's dependence on the qualities at stake. Similarly, Staffa, also within the Loch na Keal National Scenic Area and renowned as one of the most celebrated small islands in Europe, lies approximately 35 kilometres from the development area. This distance exceeds the approximate 30 kilometres to which NatureScot advised that effects on National Scenic Area qualities be assessed. Despite recognising the panoramic maritime qualities of Staffa, the applicant concludes that the scale of change would be small and the effect not significant, a position that appears insufficiently precautionary given the island's international importance. The Jura National Scenic Area, assessed as having high sensitivity at a distance of approximately 28 to 32 kilometres, is attributed only medium to low magnitude effects, with this moderation explained by distance, apparent scale, and retained landforms. However, this assessment seems to overlook the fundamental basis of Jura's designation, which rests on the wild, undeveloped character of its Atlantic outlook—precisely the quality potentially compromised by the development. A similar approach is taken to the Scarba, Lunga and the Garvellachs National Scenic Area, situated approximately 35 to 40 kilometres away, which also receives a comparable assessment. Taken together, these assessments suggest a pattern of underestimation or insufficient consideration of significant effects on designated landscapes and island communities, particularly where their defining qualities are dependent on unspoilt seascapes and remoteness. In conclusion, the applicant's approach does not fully acknowledge or mitigate the likely impacts on these sensitive areas, thereby risking harm to their natural and cultural attributes that warrant stronger protection.

The applicant's assessment 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 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.

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.

1.1.263 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy obligations governing its determination. The applicant’s own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the local communities and heritage of the coastal area. However, independent scrutiny of the submitted documents reveals that these impacts have been understated, with a critical heritage assessment conspicuously absent. Furthermore, while the effects on the island communities affected by the development were acknowledged, no comprehensive assessment of these impacts has been undertaken. In addition, the ecological tests required by policy have not been demonstrated as achievable. It is also pertinent to note that the application before the Scottish Ministers pertains only to a portion of the overall project.

Given these substantial shortcomings, it is urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm and reject the related marine licence application. Should the Ministers consider otherwise, it is requested that the applicant be required to provide further environmental information alongside enhanced visualisations. Moreover, any decision should be deferred until after a public inquiry, affording a thorough examination of the concerns raised in this objection. Regardless of the outcome, it is further requested that the Ministers issue explicit conclusions within their decision statement concerning the project's effects on cultural heritage and on the impacted island communities.

Yours faithfully,

[Redacted]

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

Member of the public 629
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.

1.1.264 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 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.

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.

1.1.265 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 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 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 falls short in providing adequate mitigation measures to protect the cultural significance of internationally and nationally important heritage assets and their settings. Unlike the requirements set out in NPF4 Policy 7(h) concerning

scheduled monuments, as well as Policies 7(c) and 7(d) relating to the setting of heritage assets, the applicant has not supplied the necessary assessments or evidence demonstrating that these values will be safeguarded. This absence of detailed evaluation contrasts unfavourably with the expectations of comprehensive heritage protection embedded within the relevant policy framework.

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

1.1.266 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 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.

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.

1.1.267 Public Engagement, Site Selection and Environmental Information

The shortcomings in public participation and the timing of consultation materially diminish the credibility of the site-selection process, particularly when compared to the rigorous standards expected under GEN 18 of the National Marine Plan and the Aarhus Convention's principles. The applicant invites Scottish Ministers to place significant weight on the site-selection process; however, this is undermined by persistent deficiencies in engagement at both the plan and application stages. Notably, the consultation period coincided with the busiest months for island communities, who face continuous work throughout the visitor season and reduced access to specialist advice. This contrasts sharply with the applicant's extensive preparation, supported by substantial professional and financial resources over several years. Given these imbalances, those affected have not been afforded a realistic opportunity to participate in decisions of such consequence. It is therefore essential that Ministers carefully consider the limitations of the consultation process when evaluating the representations submitted.

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.

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

Across Mull, the applicant admits to significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, encompassing the island's western waters and islands, is assessed as having High sensitivity over distances of approximately 21 to 33 kilometres. Despite this, the magnitude of impact is only rated as Medium, a conclusion that appears

inconsistent with the recognised importance of this landscape. The applicant's reliance on distance-based criteria to diminish the perceived scale of change, as seen in the treatment of the Wilderness and Gribun Rocks coastal area where viewing distances exceed 30 kilometres, further exemplifies the inadequacy of the assessment. This approach fails to capture the enduring visual and experiential harm to the landscape character and visitor appreciation that underpins the local economy.

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

The applicant's assessment significantly 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.

1.1.269 Personal Observations

In addition to the planning matters above, I am personally concerned because: As a orthodox Christian of the west I have a culture heritage stemming from the missionaries of Iowa and do not wish for the isle or the lifes monks who live there to be changed

Based on my own local knowledge, I also wish to highlight that: The greatest import to me is the historic sight of the monistay and it's preservation

Finally, I would also ask the Scottish Ministers to consider: Thouw I am not a UK citizen as a native English speaking living in the diaspora this trubles me greatly

1.1.270 Summary

The proposal for the MachairWind Offshore Wind Farm has failed to demonstrate compliance with the applicable statutory and policy frameworks governing its determination. The applicant's own assessment acknowledges significant impacts on nationally designated landscapes, as well as on the cultural heritage and communities along this coastal area. Moreover, independent reviews of the submitted documents reveal that these impacts have been understated. Crucially, the necessary heritage assessment has not been undertaken, and although the effects on the island communities within the project's influence were identified, they have never been formally assessed. Additionally, the ecological requirements have not been proven to be achievable. It should also be noted that the application before the Scottish Ministers does not encompass the entire project.

Given these substantial shortcomings, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to reject the associated marine licence. Should the Ministers consider proceeding with the application, I request that they require the submission of further environmental information alongside enhanced visualisations. In such a scenario, the determination of the applications ought to be deferred until after a public inquiry, 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 to 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 630
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, which encompass 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 correspondence be recorded as an objection, that I be officially registered as an objector, and that I receive notification of the final determination of these applications.

The proposals envisage the development of an offshore wind farm with an installed capacity of approximately 2 gigawatts. This would involve the installation of between 91 and 144 turbines, each with blade tips reaching up to 335 metres in height. The project site lies within a Windfarm Development Area spanning some 448 square kilometres of marine space situated to the north-west of Islay and to the west of Colonsay. The location is approximately 21 kilometres from the island of Iona and lies in proximity to the islands and coastal settlements of the southern Hebrides.

The basis for this objection is founded on planning and environmental considerations framed by the statutory and policy context applicable to these proposals. It is incumbent upon the applicant to provide compelling and sufficient evidence demonstrating that all relevant statutory tests and policy requirements have been met. The onus is not on objectors to disprove the application but rather on the applicant to discharge this burden of proof. In my assessment, the applicant has failed to meet these obligations satisfactorily. Consequently, I contend that consent for both the section 36 application and the marine licence should be withheld.

1.1.271 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 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 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 not discretionary but forms an integral part of the statutory assessment process for the application.

Upon examination of the application and supporting documentation, it is evident that compliance with these statutory policies has not been demonstrated. The evidence provided fails to adequately address the requirements of the National Marine Plan's General Policies, resulting in clear deficiencies and omissions. These shortcomings include insufficient demonstration of co-existence measures with existing marine users as required by GEN 4, inadequate assessment of impacts on the historic environment contrary to GEN 6 and related paragraphs, and a failure to properly evaluate effects on landscape and national scenic areas as stipulated in GEN 7. Furthermore, the application does not satisfactorily consider natural heritage protections under GEN 9, nor does it meet the engagement standards set out in GEN 18. Crucially, the evidence submitted does not fulfill the criteria for sound evidence under GEN 19, and the cumulative impacts assessment required by GEN 21 is incomplete and lacks the necessary rigor.

Given these material deficiencies and the absence of demonstrated compliance with the applicable legal and policy framework, the application is fundamentally flawed. The Marine (Scotland) Act 2010 and the National Marine Plan establish a clear statutory regime that must be respected to ensure sustainable marine development. Where compliance is not shown, the legislation and policy expressly direct that such matters weigh against the granting of consent.

In conclusion, the marine licence application fails to meet the statutory requirements of the Marine (Scotland) Act 2010 and the relevant policies of Scotland's National Marine Plan. The identified deficiencies, omissions, and conflicts with the legal and policy framework are significant and unaddressed. Therefore, the application should be refused on the grounds of non-compliance with the statutory determination criteria.

The proposal fails to comply 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. This non-compliance constitutes a significant material consideration that weighs decisively against the granting of planning consent.

NPF4 is a critical statutory framework that must be applied in conjunction with relevant statutory duties and legislative requirements. Policy 3 mandates the protection and enhancement of biodiversity, requiring proposals to demonstrate how they will avoid harm and contribute positively to ecological networks. Policy 4 emphasizes the safeguarding of natural places, insisting on the conservation of landscapes and natural features of importance. Policy 7 requires that historic assets and places be preserved and that any impacts on their significance be thoroughly assessed and mitigated. Policy 11 governs energy considerations, demanding that developments align with sustainable energy objectives and demonstrate compliance with energy efficiency and renewable energy standards.

In this case, the application has failed to demonstrate compliance with these policies. The evidence identifies deficiencies and omissions in the submission, including inadequate assessment of biodiversity impacts, insufficient consideration of effects on natural places, a lack of thorough evaluation of impacts on historic assets, and failure to meet the energy policy requirements set out in NPF4. These shortcomings represent conflicts with the applicable legal and policy framework.

Given these unresolved deficiencies and the absence of satisfactory evidence to demonstrate compliance, the proposal does not meet the statutory and policy tests established by NPF4. Consequently, these failures must be afforded substantial weight in the decision-making process and constitute a clear basis for refusal of planning permission.

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.

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

The absence of clear and comprehensive demonstration of compliance means that the application does not adequately address the full scope of statutory and policy obligations. Where such compliance has not been demonstrated, or where the evidence reveals deficiencies, omissions, or conflicts with the legal and policy framework, these shortcomings must weigh decisively against the granting of consent. Given the applicant's failure to provide the necessary proof, the proposal cannot be considered compliant with the established legal and policy standards. Consequently, the application should be refused on this basis.

1.1.272 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.

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 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.

1.1.273 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 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 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 assessment concludes that the proposed development fails to comply with key planning policies designed to protect landscape and seascape interests. Specifically, the effects identified engage provisions within NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan, all of which set clear standards for safeguarding nationally important environments.

Moreover, the applicant has not adequately demonstrated that the scale of the acknowledged effects aligns with the methodology employed in their assessment. This lack of internal consistency undermines the credibility of their findings and

weakens any argument that the proposal adheres to the relevant policy requirements. Without robust evidence, the claimed compliance remains unsubstantiated.

In light of these considerations, the proposal does not meet the necessary criteria for protecting nationally important landscapes and seascapes as mandated by the referenced policies. Consequently, it is concluded that permission should be refused on the grounds of non-compliance with these critical planning provisions.

1.1.274 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment purports to follow Historic Environment Scotland's recognised methodology for evaluating effects on the setting of historic assets, a process developed through consultation with Historic Environment Scotland itself. This methodology mandates a careful evaluation of whether any changes to setting affect the contribution that setting makes to the cultural significance of heritage assets, with particular attention to whether the integrity of setting is adequately retained. Importantly, it emphasises that visual change alone should not be equated directly with adverse impact. Despite this clear framework, the applicant's assessment fails to demonstrate compliance with these essential evaluative steps.

A Methodological Audit, undertaken in support of community objections and relying solely on the applicant's own Appendix 14.3, reveals that while the operational assessment identifies relevant heritage attributes, it does not show how the integrity of setting has been rigorously assessed in line with the accepted methodology. Instead, the assessment confines itself to describing visual changes—such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—and then summarily concludes that the integrity of setting is adequately retained. This critical evaluative phase, which distinguishes the methodology, is absent from all examined examples. Consequently, the reliability of the applicant's conclusions regarding heritage impacts is fundamentally undermined.

The 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 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 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.

1.1.275 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.

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.

1.1.276 Ecology, Biodiversity and Habitats Regulations

The evidence submitted by the applicant clearly identifies that the development area encompasses Priority Marine Features and Annex I habitats, demonstrating the site's high ecological value. These designated features are critical components of the marine environment, indicating habitats that are rare, sensitive, or otherwise of significant conservation importance. Moreover, the surrounding waters provide essential habitat for a variety of protected species, including seabirds, marine mammals, and the basking shark, all of which are recognised for their vulnerability and conservation status. The presence of such species and habitats within and adjacent to the development footprint underscores the intrinsic ecological sensitivity of the area and elevates the potential risk profile associated with any substantial anthropogenic disturbance.

Given the scale and duration of the proposed development, which entails construction, operation, and decommissioning activities extending over several decades, there exists a considerable potential for significant adverse environmental effects. The introduction of large-scale industrial activity into this ecologically important marine environment could disrupt habitat integrity, disturb protected species, and degrade the overall biodiversity value of the site. The prolonged nature of the development phases further amplifies the risk of cumulative and long-term impacts. Consequently, careful consideration must be given to the potential environmental consequences, and robust mitigation measures will be essential to avoid or minimise harm to these Priority Marine Features and protected species. Without such safeguards, the proposal poses a substantial threat to the conservation objectives associated with this sensitive marine ecosystem.

The applicant 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.

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

The applicant has 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.

1.1.277 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 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.

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.

1.1.278 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 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.

1.1.279 Effects on Local Area

There remains considerable uncertainty regarding the adequacy of the applicant's assessment of direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Although Islay and Colonsay lie closest to the proposed development area, which spans 448 square kilometres immediately north-west of Islay and west of Colonsay, the application primarily considers Islay as

a potential project location rather than as an affected island community in its own right. This approach neglects a place-based evaluation of impacts on Islay's Atlantic-facing communities, whose setting, economy, and community life face the nearest edge of the development zone without proper assessment. For Colonsay and Oronsay, the seaward outlook integral to daily life directly confronts the array, and the North Colonsay and Western Cliffs Special Protection Area—part of Colonsay's coastline—is central to the applicant's derogation case and compensation plan. This acknowledges that harm to the internationally protected seabird population on these cliffs cannot be excluded. Moreover, Oronsay Priory, a scheduled monument of national importance within this community, is subject to the same identified gaps in the heritage assessment, particularly regarding its open maritime setting. Taken together, these points demonstrate that the applicant's environmental and heritage impact evaluation lacks the necessary depth and reliability concerning these island communities.

While the applicant acknowledges some significant effects on Iona, particularly in terms of visibility and community impact, their assessment appears to underestimate the scale and importance of these effects when compared to established mitigation benchmarks. The Coastal Character assessment designates the Sound of Iona as having high sensitivity, with direct orientation towards the development and extensive visibility. It notes a large geographical extent of change, encompassing approximately 21 kilometres, with turbines spanning around 39 degrees of the horizon, resulting in a moderate and significant overall effect. This level of impact surpasses typical thresholds where mitigation measures are expected to be robust and comprehensive.

Moreover, the applicant's recognition of significant effects on residents and visitors across much of the island, including at Dùn Ì—the highest point on Iona—does not fully account for the island's exceptional heritage context. Iona's monastic landscape, comprising the Abbey, the Nunnery, and the high crosses, holds international significance, intrinsically linked to pilgrimage routes, sea arrival, and movement through the landscape. Despite Historic Environment Scotland's request for additional viewpoints, such as from the ferry crossing and elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, these visualisations are absent from the applicant's submission. This omission limits a comprehensive understanding of the potential heritage impacts, thereby undermining the thoroughness of the environmental and social impact evaluation.

Community concern further highlights the shortcomings of the applicant's assessment. A household consultation on Iona revealed that 92 per cent of respondents oppose the proposal. Notably, habitability—a pathway of potential effect identified by the applicant's own consultants—remains unassessed. The perceived scale of the development is considerable; for context, Ben Hynish on Tiree, a familiar landmark standing 141 metres high and visible from Iona at about 33 kilometres, would be overtopped by the largest turbines by approximately 194 metres at roughly two-thirds of that distance. This comparison underscores the significant visual intrusion likely to be experienced. Taken together, these points suggest that the applicant's evaluation does not fully capture the magnitude of impacts on Iona, indicating a need for a more detailed and nuanced assessment to inform decision-making.

The applicant's assessment fails to adequately 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 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 characterises the South Tiree coastal area as having a High sensitivity at a distance of approximately 35 kilometres, while concurrently attributing a Low magnitude of change to the proposed development. This dual classification appears contradictory, given the acknowledged sensitivity of the receptor in question. The sensitivity rating recognises the intrinsic value and vulnerability of the coastal landscape, yet the Low magnitude conclusion suggests a minimal impact, a juxtaposition that warrants closer scrutiny.

Tiree's landscape is distinguished by its exceptional low-lying nature, with its defining characteristics rooted in the vast expanse of sea and sky that envelops the island. The highest elevation, Ben Hynish, reaches only 141 metres, underscoring the island's predominantly flat topography. In this context, the introduction of turbines reaching heights of up to 335 metres would represent vertical intrusions unprecedented in the seascape. Such structures would disrupt the open oceanic horizon that is central to Tiree's distinctive character, introducing elements that are fundamentally at odds with the existing landscape fabric.

The conclusion that the magnitude of change would be Low fails to acknowledge the profound alteration these turbines would effect on the visual and experiential qualities of the island's seascape. Given the sensitivity of the receptor and the scale of the proposed development, this Low magnitude finding exemplifies a significant understatement of effects. Consequently, the evaluation provided by the applicant lacks reliability in its appraisal of the impact on Tiree's sensitive and distinctive landscape character, suggesting the need for a more rigorous and balanced assessment.

The applicant's assessment 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 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.

1.1.280 Personal Observations

In addition to the planning matters above, I am personally concerned because: We visit Mull and Iona regularly. This may have grave consequences to the marine wildlife and birds. Build it somewhere else it is not right to build where you want too.

Based on my own local knowledge, I also wish to highlight that: Iona Abbey the Isle of Mull and the Isle of Iona do not need to be changed

Finally, I would also ask the Scottish Ministers to consider: Iona is precious holy place to many. Those that live on the isle do not want it damaged in any way. Build the wind farm away from this special place

1.1.281 Summary

The proposal before the Scottish Ministers fails to demonstrate compliance with the relevant statutory and policy frameworks governing its determination. The applicant's own assessment acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along the coast. However, published critiques of the applicant's documentation indicate that the extent of these impacts has been understated. Crucially, the heritage assessment required by policy has not been completed. Furthermore, although adverse effects on the island communities affected by the development were identified, no formal evaluation of these impacts has been undertaken. The ecological requirements set out by statutory tests remain unproven as capable of being satisfied. Additionally, it is important to note that only a portion of the proposed project is currently before the Scottish Ministers for consideration.

In light of these substantial deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm, as well as to refuse the

accompanying marine licence. Should the Ministers be inclined not to refuse outright, I request that they require the submission of further environmental information accompanied by enhanced visualisations. Moreover, I contend that the applications ought to be determined only following a public inquiry, allowing for comprehensive examination of the issues raised in this objection. Whatever the outcome, I also ask that the Ministers explicitly address and provide clear conclusions within their decision regarding the effects on cultural heritage and the impacted island communities.

Yours faithfully,

[Redacted]

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

Member of the public 631
Dear Sir/Madam,

I formally register my objection to the MachairWind Offshore Wind Farm proposals, submitted under application numbers 00012385 for consent pursuant to section 36 of the Electricity Act 1989, and 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. These applications, lodged by MachairWind Limited (ScottishPower Renewables), seek approval for a large-scale offshore wind development.

The project entails the installation of an offshore wind farm with a capacity of approximately 2 gigawatts, incorporating between 91 and 144 turbines. Each turbine would reach a maximum blade tip height of up to 335 metres. The development is proposed within a designated Windfarm Development Area spanning roughly 448 square kilometres of maritime area located north-west of Islay and west of Colonsay. This site lies approximately 21 kilometres from Iona, placing it in proximity to the islands and coastal communities of the southern Hebrides.

This objection is grounded in planning and environmental considerations, assessed within the relevant statutory and policy frameworks governing these applications. It is essential to emphasise that the responsibility to prove compliance with these tests rests entirely with the applicant. Objectors, including myself, are not obliged to demonstrate contrary evidence. Upon examination of the material submitted, it is clear that the applicant has failed to meet this evidential burden. Consequently, I contend that consent ought to be refused. I request that this correspondence be treated as a formal objection, that I be recorded as an objector, and that I receive notification of the decision concerning these applications.

1.1.282 Personal Observations

Based on my own local knowledge, I also wish to highlight that: Yes a lot but I am very unwell and can’t answer these right now I’m sorry

1.1.283 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 632
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, which are the subject of application numbers 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. I request that this letter be recorded as an official objection, that my details be registered accordingly, and that I be kept informed of the outcome of these applications.

The project in question seeks approval for an offshore wind installation with a capacity of approximately 2 gigawatts. It would comprise between 91 and 144 turbines, each reaching a maximum height of up to 335 metres to blade tip. The proposed site lies within a designated Windfarm Development Area extending over roughly 448 square kilometres of marine environment, located to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona. This location is in close proximity to the islands and coastal settlements of the southern Hebrides.

The following sections articulate the grounds for objection, grounded in the relevant statutory and policy contexts that govern the determination of such applications. It is important to emphasise that the onus lies firmly with the applicant to demonstrate, through adequate and compelling evidence, that all applicable statutory tests and policy requirements are met. Those opposing the development are not required to prove any contrary position. In this instance, the applicant has failed to satisfy the necessary evidential standards, and for the reasons detailed below, the applications should be refused consent.

1.1.284 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties imposed by Schedule 9 of the Electricity Act 1989, which has significant practical consequences for the determination of this proposal. Schedule 9 explicitly requires the applicant to have regard to the desirability of preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, 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, as the determining authority, are similarly required to have regard to these statutory duties when considering the application.

In this case, the application does not adequately address these requirements. There is a clear absence of evidence demonstrating that the applicant has properly considered the preservation of natural beauty or the conservation of flora, fauna, and geological or physiographical features of special interest. Likewise, the application fails to show that reasonable steps have been taken to mitigate adverse effects on these environmental and heritage interests. The lack of such evidence constitutes a fundamental deficiency in the application’s compliance with the statutory framework.

Moreover, the Scottish Ministers are mandated to have regard to these duties in their decision-making process. The failure of the applicant to meet these statutory

obligations means that the Ministers cannot lawfully grant consent without contravening the requirements of Schedule 9. Where compliance has not been demonstrated, or where deficiencies and omissions exist, these matters must weigh against the granting of consent.

In conclusion, the application's failure to adequately address the statutory duties under Schedule 9 of the Electricity Act 1989 represents a significant legal and procedural shortcoming. This deficiency alone provides a compelling basis for refusal, as the statutory framework has not been satisfied and the necessary regard to the preservation and protection of natural and historic interests has not been evidenced.

The marine licence application under consideration fails to comply with the statutory requirements set out in Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland's National Marine Plan. As the authorisation decision must be taken in accordance with the National Marine Plan unless relevant considerations indicate otherwise, the absence of demonstrated compliance with key General Policies is a fundamental procedural and substantive defect. This failure undermines the statutory basis for granting consent and renders the application legally deficient.

Specifically, the application does not adequately address compliance with General Policies GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts). These policies collectively require a thorough and evidenced assessment of environmental, cultural, and social factors, as well as meaningful engagement and consideration of cumulative effects. The absence of such evidence and assessment constitutes a clear omission and conflict with the applicable legal and policy framework.

Given these deficiencies and the failure to demonstrate compliance with the statutory and policy requirements, the application cannot lawfully be granted consent. The Marine (Scotland) Act 2010 and the National Marine Plan impose a mandatory obligation to refuse authorisation where compliance is not established. Therefore, on the grounds of non-compliance with the statutory framework and relevant National Marine Plan policies, this marine licence application should be refused.

The 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 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 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 assessment or evidence that these interests have been properly identified, evaluated, or integrated into the planning considerations.

Furthermore, the evidence highlights that where compliance with the Islands (Scotland) Act 2018 has not been demonstrated, or where deficiencies, omissions, or conflicts with the applicable legal and policy framework are apparent, these shortcomings must weigh against the granting of consent (S01). In this case, the absence of any substantive analysis or engagement with the specific needs and circumstances of island communities constitutes a significant procedural and substantive failing. This omission undermines the statutory purpose of the Act and the planning authority's duty to ensure that island communities' interests are not overlooked or marginalized.

In conclusion, the proposal's failure to properly consider and weigh the interests of island communities as required by the Islands (Scotland) Act 2018 represents a material deficiency in the planning application. This deficiency conflicts with the statutory framework and relevant policy requirements, and accordingly, it provides a clear and compelling reason to refuse consent. The planning authority must give due regard to this failure in its determination to ensure compliance with the law and proper protection of island communities.

The applicant has failed to meet the fundamental responsibility of demonstrating compliance with all relevant legal and policy requirements through robust, objective, and proportionate evidence. It is a well-established principle that the burden lies with the applicant to prove that every statutory duty, planning policy, and environmental assessment requirement has been satisfied. In this case, the evidence submitted does not fulfill this evidential burden.

Specifically, the applicant's documentation reveals deficiencies and omissions that have not been adequately addressed. There is a lack of clear, comprehensive proof that all applicable statutory duties and planning policies have been complied with. Furthermore, the evidence identifies conflicts with the legal and policy framework that remain unresolved. These shortcomings are material and significant, and they weigh decisively against the granting of planning consent.

In the absence of satisfactory demonstration of compliance, the proposal cannot be considered lawful or policy-compliant. The failure to discharge this evidential responsibility undermines the legitimacy of the application and justifies refusal.

1.1.285 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to satisfy the impact criteria of NPF4 Policy 11, resulting in significant adverse effects on nationally designated landscapes and seascapes. Contrary to the policy's requirements, it has not been demonstrated that the cultural significance of scheduled monuments and their settings would be protected, nor that island communities would be adequately safeguarded. Furthermore, the ecological assessments submitted do not establish that the necessary environmental tests can be met. As NPF4 Policy 11 supports renewable energy development only insofar as these impact criteria are complied with, the proposal cannot be regarded as consistent with the policy's provisions.

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 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.

1.1.286 Seascape, Landscape and Visual Effects

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

This implicit distance-based moderation is further confirmed by the applicant's own documentation. For example, the assessment of a coastal area over 30 kilometres distant describes the scale of change as small due to the viewing distance. The Landscape Character synthesis similarly categorises magnitudes as High within approximately 20 kilometres, Medium between roughly 20 and 30 kilometres, and Low beyond about 30 kilometres for certain landscape types. Such gradations

demonstrate that distance plays a decisive role in reducing assessed impacts even before considering other factors.

As a result, the protective tests intended to safeguard sensitive landscapes are being applied to inputs that are systematically understated at critical distances where designated landscapes are located. This calls into question the reliability of the conclusions presented to the Scottish Ministers, as the methodology does not accurately reflect the true effects on receptors that lie beyond the approximately 20-kilometre threshold. Consequently, consent based on these assessments would rest on an incomplete understanding of the potential environmental impacts.

When comparing mitigation measures, it is important to recognise the inherent limitations of the visualisation materials provided in support of the assessment. NatureScot's visualisation guidance, which the applicant has followed, explicitly states that printed visualisations cannot fully convey the true scale perceived by a viewer on site. This acknowledgement highlights that even well-produced visual materials may underrepresent or distort the real visual impact experienced in the field.

Furthermore, the wireline drawings included alongside photographic panoramas share similar constraints. These drawings serve as technical renderings embedded within the visualisations rather than independent tools that correct or enhance the photographic evidence. As such, they do not overcome the fundamental perceptual challenges associated with representing three-dimensional scale and distance on a two-dimensional medium.

While these visual materials provide a useful indication of potential impacts, their acknowledged technical and perceptual limitations must be taken into account when assessing the effectiveness of proposed mitigation. Relying solely on these visualisations risks underestimating the true extent of the visual effects, suggesting a need for cautious interpretation within the decision-making process.

When assessing the impact of the proposed development on the night-time seascape character, it is important first to consider the nature and extent of any mitigation measures against the permanent introduction of artificial lighting. The proposal would necessitate aviation and navigation lighting on a sea horizon that is currently free from such illumination. This change would result in a permanent alteration to the character of the night-time seascape for the planned 35-year operational life of the development. While mitigation might seek to minimise light spill or glare, the fundamental presence of lighting in an unlit seascape represents a significant and inescapable transformation.

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

lasting impact on the seascape character that must be carefully weighed in the planning balance.

The applicant's 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.

1.1.287 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 own baseline assessment acknowledges that the cultural significance of the affected heritage assets arises from a complex interplay of qualities, notably pilgrimage, arrival by sea, and movement through a living cultural landscape. It highlights the importance of the relationships between monuments, spirituality, and their surrounding landscape and seascape, emphasising that these are experienced dynamically through movement rather than from fixed viewpoints. Despite this recognition, Historic Environment Scotland's consultation responses—also recorded within the application—have requested additional viewpoints to ensure these broader experiential and cultural landscape qualities are adequately represented. This suggests that the applicant's assessment may not fully capture the

wider cultural context and experiential dimensions that contribute to the heritage assets' significance. Therefore, further consideration is necessary to properly address these aspects in the heritage impact appraisal.

The heritage impact conclusions presented in the application are fundamentally reliant on the underlying landscape assessment. It is evident that where the landscape effects have been understated, as previously demonstrated, any heritage conclusions derived from this assessment consequently reflect the same understatement. This dependency indicates a cascading effect whereby inaccuracies or minimisations in the landscape evaluation directly compromise the reliability of the heritage impact findings.

Given this interdependence, the credibility of the heritage conclusions is significantly undermined. Without a robust and accurate landscape assessment, the heritage impacts cannot be properly understood or mitigated. Therefore, the planning considerations should not accept the heritage conclusions at face value but rather recognise that their foundation is flawed, necessitating a more thorough and transparent appraisal to ensure that all effects are appropriately identified and addressed.

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.

1.1.288 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 socio-economic assessment fails to provide an adequate understanding of the impacts on island communities, particularly when compared to the detailed evaluation of port communities. While the assessment recognises habitability as a potentially significant pathway affecting island communities, no subsequent place-based analysis of the islands' habitability was undertaken. Instead, Chapter 18 confines its detailed scrutiny to regional and port community impacts, ultimately concluding that island communities exhibit low sensitivity to tourism-related effects. This inconsistent approach undermines the robustness of the assessment and weakens any mitigation strategies proposed for these vulnerable communities.

Island economies are distinctive and cannot be accurately represented by regional averages. Their economic structure is heavily concentrated in sectors that are directly reliant on the attributes attracting visitors, making them inherently more sensitive to any changes affecting those qualities. Indeed, dependence on increasing visitor numbers intensifies, rather than diminishes, their vulnerability. Therefore, the applicant's conclusion of low sensitivity—arrived at without a proper place-specific analysis—is not supported by evidence but rests on an unfounded assumption. This methodological shortcoming calls into question the validity of the socio-economic assessment and the adequacy of proposed mitigations for the island communities concerned.

The proposal fails to comply with the necessary planning policies and statutory duties relating to island communities. Specifically, it neglects the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions be founded on robust socio-economic evidence and adopt a precautionary approach when such evidence is insufficient. Additionally, it does not adhere to NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, both of which require that the interests of island communities be thoroughly assessed and appropriately weighted through meaningful engagement from the outset to the conclusion of the planning process.

Crucially, the applicant acknowledged that island communities warrant particular scrutiny but failed to undertake the necessary assessment to understand the potential effects of the proposal on these communities. This omission represents a significant shortcoming in demonstrating that the development is compatible with the sustainability of island communities. The absence of this critical evaluation

undermines confidence that the statutory duties owed to these communities have been fulfilled.

In conclusion, given the lack of adequate assessment and meaningful engagement with island communities as required by relevant policies and statutory frameworks, the proposal does not meet established planning and legal standards. Therefore, it cannot be considered compliant with the requirements designed to protect and support sustainable island communities.

1.1.289 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 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.

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.

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.

1.1.290 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 assessment presented in the Environmental Impact Assessment relies fundamentally on the baseline conclusions derived from separate evaluations of landscape, heritage, and socio-economic factors. However, these underlying assessments have been demonstrated to understate the true extent of effects, as previously detailed. Consequently, the cumulative assessment inherits this diminished baseline, which means it does not fully capture the aggregate impacts when this proposal is considered in conjunction with other existing, consented, and foreseeable developments. This methodological shortfall results in a significant underestimation of the combined effects, thereby compromising the reliability of the cumulative impact assessment.

Given that the cumulative assessment's accuracy is directly dependent on the validity of the initial baseline evaluations, any understatement in those foundational assessments systematically translates into an understated cumulative impact. This flaw undermines confidence in the assessment’s conclusions and potentially obscures the real magnitude of environmental and socio-economic consequences that may arise from the collective developments. It is imperative that the baseline assessments be rigorously revisited to ensure they accurately reflect the true conditions, thereby enabling a more robust and credible cumulative impact analysis. Without such rectification, the planning decisions informed by the current assessment risk being based on incomplete and misleading evidence.

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.

1.1.291 Public Engagement, Site Selection and Environmental Information

The applicant emphasises that the weight the Scottish Ministers are asked to place on the site-selection process renders the quality of public participation in that process directly material. However, significant deficiencies in participation during both the plan and site-selection stages have persisted into the application stage. The application itself comprises many thousands of pages of technical material, yet the consultation period occurred during the busiest months for island communities, when residents are engaged continuously throughout the visitor season and access to specialist advice is limited. In contrast, the applicant has had years and substantial professional and financial resources to prepare its case. Furthermore, GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, require that those affected have a realistic opportunity to engage with decisions of this magnitude. The conditions imposed on the affected communities fall short of this standard, thereby undermining the legitimacy of the site-selection process. It is therefore imperative that Ministers give due regard to these deficiencies when considering the representations made.

The practical consequence of the 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.

1.1.292 Effects on Local Area

The proposed development encompasses a substantial 448 square kilometre area situated immediately north-west of Islay and west of Colonsay, placing these islands in closest proximity to the project site. Despite this, the applicant's assessment predominantly considers Islay in terms of its potential as a direct project location rather than as a distinct affected community. This approach fails to provide a place-based evaluation of the development's effects on Islay's Atlantic-facing communities, whose daily lives and local economy would be directly influenced by the nearest edge of the development area. Consequently, the assessment does not adequately address the considerable and direct impact on the setting, community life, and economic activities of Islay's residents.

For Colonsay and Oronsay, the situation is equally concerning. The islands' seaward outlook, integral to their daily existence, faces the development array directly. Notably, the North Colonsay and Western Cliffs Special Protection Area, located along Colonsay's coastline, is central to the applicant's derogation case and compensation plan, which implicitly acknowledges that harm to the internationally protected seabird population cannot be ruled out. Additionally, Oronsay Priory, a scheduled monument of national importance within this community, has an open maritime setting that the heritage assessment inadequately addresses, mirroring the gaps identified elsewhere in the application. Collectively, these shortcomings undermine the reliability of the environmental and heritage impact evaluation for Islay, Colonsay, and Oronsay, as the applicant's assessment does not sufficiently capture the direct and significant effects on these island communities, their economy, and their heritage assets.

The applicant's assessment 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 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 characterises the South Tiree coastal area as having a High sensitivity at a distance of approximately 35 kilometres, while concurrently attributing a Low magnitude of change to the proposed development. This dual classification appears contradictory, given the acknowledged sensitivity of the receptor in question. The sensitivity rating recognises the intrinsic value and vulnerability of the coastal landscape, yet the Low magnitude conclusion suggests a minimal impact, a juxtaposition that warrants closer scrutiny.

Tiree's landscape is distinguished by its exceptional low-lying nature, with its defining characteristics rooted in the vast expanse of sea and sky that envelops the island. The highest elevation, Ben Hynish, reaches only 141 metres, underscoring the island's predominantly flat topography. In this context, the introduction of turbines reaching heights of up to 335 metres would represent vertical intrusions unprecedented in the seascape. Such structures would disrupt the open oceanic

horizon that is central to Tiree's distinctive character, introducing elements that are fundamentally at odds with the existing landscape fabric.

The conclusion that the magnitude of change would be Low fails to acknowledge the profound alteration these turbines would effect on the visual and experiential qualities of the island's seascape. Given the sensitivity of the receptor and the scale of the proposed development, this Low magnitude finding exemplifies a significant understatement of effects. Consequently, the evaluation provided by the applicant lacks reliability in its appraisal of the impact on Tiree's sensitive and distinctive landscape character, suggesting the need for a more rigorous and balanced assessment.

The applicant's assessment notably omits consideration of significant effects on 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 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.

1.1.293 Personal Observations

In addition to the planning matters above, I am personally concerned because: I have visited iona for the last 2 summers and plan to again next year. I am a regular tourist who wants the island and surrounding community to remain peaceful and protected from industrial disturbance. I also want the local community and friends I've made on the island to continue to benefit from tourism which may be impacted if this wind farm goes in.

Based on my own local knowledge, I also wish to highlight that: Yes, the seas and wildlife off the coast of Iona, the view from the Machair

Finally, I would also ask the Scottish Ministers to consider: Please don't allow this to proceed. This is a sacred place to so many.

1.1.294 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 633
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.

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

The evidence before the determining authority does not show that the applicant has sufficiently addressed these requirements. There is a clear absence of demonstrated compliance, with deficiencies and omissions apparent in the consideration of the impact on natural beauty, biodiversity, and heritage assets. The application lacks adequate assessment and fails to provide reasonable mitigation measures for the adverse effects identified. This failure to meet the statutory duties under Schedule 9 constitutes a material conflict with the applicable legal framework.

Given these shortcomings, the application does not satisfy the statutory criteria necessary for consent. The unresolved deficiencies and omissions weigh decisively against the granting of planning permission.

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, 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 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 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 submitted documentation that these interests have been properly identified, assessed, or integrated into the planning rationale. This omission represents a fundamental procedural deficiency, as the statutory duty to consider island communities is not a discretionary matter but a legal obligation. The absence of any substantive analysis or mitigation measures addressing the specific impacts on island communities indicates a failure to meet the statutory standard set out in the Act.

Given that compliance with the Islands (Scotland) Act 2018 has not been demonstrated, and that the evidence reveals clear omissions in the consideration of island community interests, these shortcomings must weigh decisively against the granting of consent. The legal and policy framework is explicit in requiring due weight to be accorded to island communities, and where this is not achieved, the proposal conflicts with the applicable statutory requirements. Consequently, the proposal should be refused on the basis that it does not satisfy the mandatory provisions of the Islands (Scotland) Act 2018.

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 applicant must provide robust, objective, and proportionate evidence to show that every applicable statutory duty, planning policy, and environmental assessment obligation has been fully satisfied. In this case, the evidence submitted does not meet this evidential burden.

Specifically, the application lacks sufficient demonstration that all statutory duties have been complied with, and there are clear deficiencies and omissions within the submitted documentation. These shortcomings amount to a failure to prove adherence to the applicable legal and policy framework. As a result, the application does not provide the necessary assurance that the proposal accords with the statutory and policy requirements governing the development.

Given these evidential failings, the application cannot be considered compliant with the legal and policy framework. Where such compliance is not demonstrated, the relevant guidance is unequivocal that these matters must weigh against the granting of consent. Therefore, on the basis of the applicant's failure to meet the required evidential standards, the proposal should be refused.

1.1.296 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to meet the impact criteria established in NPF4 Policy 11, which explicitly governs renewable energy development through its detailed provisions. Notably, the policy's clauses 11(c), 11(d), and 11(e) require careful consideration of impacts on communities, landscapes, seascapes, and other receptors. This application does not satisfy these requirements, thereby undermining the policy's intended balance between support for renewable energy and protection of environmental and cultural assets.

Specifically, the development would cause significant adverse effects on nationally designated landscapes and seascapes, contrary to the policy's safeguards. Furthermore, the applicant has not demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, nor that island communities would be adequately protected. Additionally, the necessary ecological assessments and tests have not been convincingly addressed in the submitted evidence. Taken together, these deficiencies confirm that the proposal conflicts with the impact criteria of NPF4 Policy 11 and cannot be supported.

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

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

The proposal would result in 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.

1.1.297 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 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 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'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.

1.1.298 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment adopts Historic Environment Scotland's recognised methodology for evaluating effects on the setting of historic assets, a framework developed and refined through consultation with that body. This methodology emphasises the need to evaluate whether changes to setting affect the contribution setting makes to the cultural significance of heritage assets and whether the integrity of setting is adequately retained, explicitly cautioning against equating visual change directly with adverse impact. However, a published Methodological Audit prepared in support of community objections, working solely from the applicant's Appendix 14.3, identifies a critical shortcoming in the operational assessment. While the assessment identifies heritage attributes such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it fails to demonstrate how the integrity of setting has been evaluated in line with the applicant's own accepted methodology. The Audit highlights that the assessment describes visual changes but does not perform the necessary evaluative step to establish whether the integrity of setting is preserved, a deficiency apparent in all examined worked examples. This omission undermines the reliability of the conclusions drawn about heritage impacts and calls into question the thoroughness of the applicant's assessment.

The applicant's own baseline assessment acknowledges that the cultural significance of the heritage assets affected by the proposal extends beyond isolated physical features. It is derived from a complex interplay of qualities including pilgrimage routes, arrival by sea, and the experience of movement through a living cultural landscape. This significance is further shaped by the interrelationships between monuments, spirituality, and the encompassing landscape and seascape, which are appreciated dynamically rather than from fixed viewpoints. Such an understanding underscores the importance of considering the broader experiential and contextual dimensions of the heritage assets when assessing potential impacts.

Despite this recognition, Historic Environment Scotland's consultation responses, as recorded within the application documentation, highlighted the need for additional viewpoints to ensure that these wider qualities are fully represented in the assessment. This request signals a concern that the current evaluation may not adequately capture the cultural landscape's broader experiential attributes, potentially leading to an incomplete understanding of the heritage impacts. It is therefore essential that the assessment methodology incorporates these perspectives to provide a more comprehensive and robust appraisal of the proposal's effects on the cultural significance of the heritage assets.

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.

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.

1.1.299 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 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 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.

1.1.300 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 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 clearly establishes the rigorous legal framework established by the Habitats Regulations, which governs any development proposals potentially affecting protected habitats and species. Consent for such developments can only be granted if the competent authority has unequivocally ascertained that the proposal will not adversely affect the integrity of the protected site, or if the strict derogation tests are satisfied. This places a very high evidential standard on the applicant, requiring that no reasonable scientific doubt remains regarding the absence of adverse effects. Importantly, the responsibility to demonstrate compliance with these statutory tests lies firmly with the applicant. Furthermore, mitigation measures, compensation proposals, and commitments to future monitoring, while relevant, cannot alone satisfy the statutory requirements or substitute for the necessary scientific certainty.

This stringent legal requirement is supported and reinforced by the broader policy framework encompassing GEN 9 and GEN 13 of the National Marine Plan, alongside Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). These policies collectively emphasise the imperative to safeguard protected habitats and species by ensuring that developments conform fully to the Habitats Regulations' standards before consent is granted. Consequently, any planning decision must be grounded in robust scientific evidence demonstrating no adverse

effects on site integrity, reflecting the fundamental principle that environmental protection in these contexts cannot be compromised or presumed through future actions. This framework underscores the necessity for the competent authority to exercise rigorous scrutiny and for applicants to meet their substantial evidential burden in full.

The 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.

1.1.301 Cumulative and In-Combination Effects

The current approach to assessing the project is fundamentally flawed because it fragments the development, undermining a comprehensive evaluation of its overall impacts. Only a portion of the project is presently before the Scottish Ministers, while critical components such as the export cable corridor and the onshore transmission works are deferred to subsequent applications. Given that these elements are essential for the wind farm's operation, their exclusion from the principal assessment means that the effects of the entire project are never considered collectively. This piecemeal method contradicts the established legal principle, affirmed by the courts in Raeshaw Farms, that a project must be assessed in its entirety rather than being divided into smaller parts whose individual impacts may appear less significant. Consequently, the current assessment fails to provide a holistic understanding of the project's full environmental and planning implications, rendering the decision-making process incomplete and procedurally unsound.

The 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 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.

1.1.302 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.

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.

1.1.303 Effects on Local Area

There is significant uncertainty regarding the applicant's assessment of the direct and substantial effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Notably, Islay and Colonsay are the closest inhabited islands to the proposed development area, which extends over 448 square kilometres immediately north-west of Islay and west of Colonsay. However, the application approaches Islay primarily as a potential project location rather than as an affected island community in its own right. This perspective results in an absence of any place-based evaluation of how the development might impact Islay's Atlantic-facing communities, their setting, economy, or community life, thereby undermining the reliability of the environmental and heritage impact appraisal.

For Colonsay and Oronsay, the situation is no less concerning. The seaward outlook, which profoundly shapes daily life on these islands, directly faces the proposed array. Of particular importance is the North Colonsay and Western Cliffs Special Protection Area, located along Colonsay's own coastline. This site is central to the applicant's derogation case and compensation plan, acknowledging that harm to the internationally protected seabird populations of these cliffs cannot be ruled out. Such an admission highlights the potential for significant and irreversible environmental effects, yet the wider implications for the community and natural heritage appear insufficiently addressed.

Moreover, Oronsay Priory, a scheduled monument of national importance, is situated within this same community area. The concerns previously identified regarding gaps in the heritage assessment apply equally to the evaluation of the Priory's open maritime setting. The failure to adequately consider the impact on this nationally significant heritage asset further calls into question the thoroughness and robustness of the applicant's environmental and heritage impact evaluation. Taken together, these points indicate that the assessment underestimates the magnitude and significance of effects on these island communities, thus raising serious doubts about the overall reliability of the application's conclusions.

The applicant's Coastal Character assessment acknowledges the Sound of Iona as an area of high sensitivity, noting its direct orientation towards the development site, extensive visibility, and a large geographical extent of change. The overall effect is described as moderate and significant over a distance of approximately 21

kilometres, 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 accepts that significant effects would be experienced by residents and visitors across much of the island, including at Dùn Ì, the highest point on Iona.

However, the applicant's evaluation appears to understate the scale and significance of these impacts. Iona's monastic landscape, encompassing internationally important heritage assets such as the Abbey, the Nunnery, and the high crosses, is integral to pilgrimage, arrival by sea, and movement through the landscape—key elements identified 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 raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, a notable omission given the prominence of this vantage point in the heritage context.

Moreover, community consultation reveals a substantial level of opposition, with 92 per cent of Iona households objecting to the proposal. The applicant's own consultants identified habitability as a potential pathway of effect on the community, yet this has not been properly assessed, leaving a gap in the social impact evaluation. To contextualise the visual scale, Ben Hynish on Tiree, a familiar 141-metre landmark visible from Iona at approximately 33 kilometres, would be overtopped by the proposed largest turbines by about 194 metres, despite those turbines being situated at roughly two-thirds of that distance. This comparison underlines the considerable visual dominance and alteration of the landscape that would result.

In summary, while the applicant recognises significant effects on Iona, the evidence suggests these impacts are more extensive and profound than acknowledged, affecting visual amenity, community well-being, and internationally significant heritage assets. This underestimation compromises the accuracy and completeness of the environmental and social impact assessment for Iona.

The applicant's assessment acknowledges significant effects on the Ross of Mull South coastal area, attributing a High sensitivity at distances of approximately 22 to 24 kilometres and a Medium magnitude of impact. Notably, significant effects are accepted at Erraid and along the Core Paths of the Ross, with particular recognition that Fionnphort—the gateway to Iona and the embarkation point for visitors—is the community most directly affected by changes to visitor flows. Across Mull, the applicant similarly accepts significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is assessed as having High sensitivity throughout at distances ranging from approximately 21 to 33 kilometres, yet it is attributed no more than Medium magnitude of impact.

This assessment, however, demonstrates an overreliance on distance-based reasoning that inadequately captures the significance of effects on key coastal areas. For example, the applicant's treatment of the Wilderness and Gribun Rocks coastal area, where the scale of change is judged small due to a viewing distance exceeding 30 kilometres, exemplifies this limited approach. Such a methodology fails

to account for the qualitative importance of these landscapes to local communities and tourism.

Crucially, Mull's west-facing tourism economy, which includes wildlife boat operations and the accommodation sector of its western townships, is fundamentally dependent on the Atlantic seascape that the proposed development would industrialise. Despite this, no place-based assessment has been provided for these communities. Consequently, the applicant's evaluation underestimates the significant visual, economic, and community impacts on Mull and Ross of Mull's coastal landscapes and the tourism-dependent populations that rely upon them.

The applicant's assessment 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 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, 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 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.

1.1.304 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 coastal communities and their heritage. However, independent scrutiny of the applicant's documentation reveals that these effects have been understated, and that an essential heritage assessment has not been conducted. Furthermore, while the detrimental impacts on the island communities have been identified, no formal assessment of these effects has taken place. Additionally, the ecological tests mandated by policy remain unproven as achievable. It is also notable that the application before the Scottish Ministers represents only a portion of the entire project.

Given these substantial 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 approval, it is requested that they require the submission of further environmental information alongside enhanced visualisations. Moreover, determination of the applications should 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 requested that the Ministers provide explicit conclusions within their decision, 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 634
Dear Sir/Madam,

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

The proposal concerns the construction of an offshore wind farm with a generating capacity in the region of 2 gigawatts. The development envisages between 91 and 144 turbines, each with a maximum height of up to 335 metres to blade tip. This facility would occupy a Windfarm Development Area extending over approximately 448 square kilometres of sea, located north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in proximity to the islands and coastal settlements of the southern Hebrides.

The following analysis outlines my objections grounded in planning and environmental considerations, assessed against the pertinent statutory and policy frameworks governing the determination of these applications. It is important to emphasise that the onus lies squarely with the applicant to furnish sufficient evidence demonstrating compliance with the applicable tests. Objectors carry no obligation to prove the contrary. Upon careful evaluation of the evidence presented, it is clear that the applicant has failed to meet this burden, and accordingly, the applications should be refused consent.

1.1.305 Seascape, Landscape and Visual Effects

There is significant uncertainty regarding the reliability of the applicant's assessment methodology, particularly in how distance thresholds are applied to determine the magnitude of effects. The methodology outlined in Appendix 16.1 does not specify any distance beyond which major effects are considered to cease. Nonetheless, an independently prepared Evidence Note, based solely on the applicant's Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern across all assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of the receptor's sensitivity or the extent of visibility. This finding is further corroborated by the applicant's own documents, which acknowledge distance as a key factor in their judgements. For example, an assessment of a coastal area over 30 kilometres away concludes that, given the viewing distance, the scale of change is small. Additionally, the Landscape Character synthesis categorises magnitude as High within roughly 20 kilometres, Medium between about 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. The practical effect of this approach is that the protective tests are applied to inputs that systematically understate magnitude at precisely the distances where the most sensitive designated landscapes are located. Consequently, the conclusions presented cannot be relied upon to accurately describe the effects that the Scottish Ministers are being asked to consent.

When considering the visual impact of the proposed development, it is important to compare the extent to which mitigation measures can address potential adverse effects. While landscaping and screening can reduce visibility from certain viewpoints, the effectiveness of such measures is inherently limited by the nature of the terrain and the scale of the development. This highlights the need for a careful and nuanced assessment of visual impacts, rather than reliance on visualisation materials alone.

The visual evidence presented in support of the application follows NatureScot's visualisation guidance, which the applicant adopts. This guidance acknowledges a fundamental limitation: printed visualisations cannot fully replicate the scale perceived by a viewer in the field. Consequently, the images and wireline drawings—although useful—are constrained by the same photographic basis and do not independently correct the viewer's perception. The wireline drawings, presented within the panoramic projections, serve as a technical overlay rather than a definitive representation of the development's visual presence.

Given these technical and perceptual limitations, it is essential that decision-makers exercise caution when interpreting the visualisation materials. They should consider the potential discrepancies between the images and the actual experience on site, particularly in relation to the scale and prominence of the development. Such an approach ensures a balanced assessment that recognises the value of the visualisations while acknowledging their inherent constraints.

The introduction of aviation and navigation lighting to a previously unlit sea horizon 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.

1.1.306 Cultural Landscape, Archaeology and Historic Environment

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 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.

1.1.307 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 provide an adequate basis for mitigating impacts on island communities, particularly when compared to the detailed place-based analysis applied to regional port communities. While the assessment in Chapter 18 thoroughly examines potential port communities, it neglects to conduct any equivalent analysis of the affected islands, despite the applicant's own consultants identifying habitability as a potentially significant pathway for impact. Instead, the assessment proceeds at a regional level and concludes, without specific evidence, that island communities have low sensitivity to tourism effects.

This approach is fundamentally flawed. Small island economies are not simply regional averages; rather, they are characterised by concentrated economic activities in sectors highly vulnerable to changes in the qualities that attract visitors. Far from reducing sensitivity, reliance on increasing visitor numbers exacerbates dependence on those qualities and heightens vulnerability. Concluding low sensitivity without place-based analysis is therefore not supported by evidence but rests solely on an unsupported assumption. Consequently, the socio-economic assessment methodology is insufficient to understand or appropriately mitigate the impacts on island communities.

1.1.308 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 submission of a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan by the applicant has a direct and practical consequence for the assessment of this proposal. These documents acknowledge that adverse effects on the integrity of the North Colonsay and Western Cliffs Special Protection Area cannot be ruled out at this stage. The applicant’s decision to prepare and submit such evidence indicates an understanding that the project may impact the protected guillemot population, necessitating consideration under derogation provisions to allow for potential disturbance or loss.

Analytically, the presence of these documents as part of the application is significant in itself. They demonstrate that the applicant recognises the sensitivity of the designated site and is seeking to address potential impacts through compensatory measures. However, the applicant’s own approach concedes that Scottish Ministers might ultimately reach a different conclusion regarding the likelihood or extent of adverse effects. This acknowledgement highlights the need for careful scrutiny of the derogation and compensation proposals to ensure that any harm to the protected features is adequately mitigated, in accordance with relevant policy and statutory requirements.

Mitigation, compensation proposals, and future monitoring, 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.

1.1.309 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 cumulative impact assessment presented in the Environmental Impact Assessment relies fundamentally on the baseline conclusions derived from separate evaluations of landscape, heritage, and socio-economic factors. However, these underlying assessments have been demonstrated to understate the true extent of effects, as previously detailed. Consequently, the cumulative assessment inherits this diminished baseline, which means it does not fully capture the aggregate impacts when this proposal is considered in conjunction with other existing, consented, and foreseeable developments. This methodological shortfall results in a significant underestimation of the combined effects, thereby compromising the reliability of the cumulative impact assessment.

Given that the cumulative assessment's accuracy is directly dependent on the validity of the initial baseline evaluations, any understatement in those foundational assessments systematically translates into an understated cumulative impact. This flaw undermines confidence in the assessment’s conclusions and potentially obscures the real magnitude of environmental and socio-economic consequences that may arise from the collective developments. It is imperative that the baseline assessments be rigorously revisited to ensure they accurately reflect the true conditions, thereby enabling a more robust and credible cumulative impact analysis. Without such rectification, the planning decisions informed by the current assessment risk being based on incomplete and misleading evidence.

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.

1.1.310 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 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.

1.1.311 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.

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

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

Community concerns further underscore the shortcomings of the applicant's assessment. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal, reflecting widespread local opposition. Despite this, the applicant's consultants have not evaluated habitability impacts, even though their own analysis identifies this as a potential pathway of effect. The scale of the

turbines' visibility is emphasised by comparison with the familiar landmark of Ben Hynish on Tiree, which is 141 metres high and visible from Iona at around 33 kilometres; the proposed turbines would exceed this height by approximately 194 metres, at a closer distance of roughly two-thirds of Ben Hynish's range. Taken together, these considerations suggest that the applicant's environmental and social impact evaluation for Iona lacks the necessary depth and accuracy.

The applicant's assessment acknowledges significant effects on 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 acknowledges potential effects on designated landscapes within the Loch na Keal National Scenic Area, including Ulva and Staffa, yet these evaluations appear to underestimate or omit significant impacts, particularly on vulnerable island communities and their natural and cultural qualities. Ulva, a community-owned island within this National Scenic Area, is at an early stage of regeneration, characterised by a small, re-establishing population whose recovery is intrinsically linked to the unspoilt seascape and setting that the development threatens. Notably, no specific assessment of effects on Ulva's

community or landscape qualities has been provided, leaving a critical gap in understanding the full implications.

Staffa, situated within the same National Scenic Area and renowned as one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development site. This distance exceeds the applicant's own assessment boundary, which extends to around 30 kilometres as advised by NatureScot for evaluating effects on National Scenic Area qualities. Despite recognising Staffa's panoramic maritime qualities, the applicant concludes that changes there would be small and not significant, a position that does not fully account for the island's cultural and environmental importance.

Beyond these, the Jura National Scenic Area, located approximately 28 to 32 kilometres from the development, is assessed with high sensitivity but assigned only medium to low magnitude of impact. This moderation is justified primarily by distance, apparent scale, and retention of landforms, notwithstanding that the area's designation is fundamentally based on its wild, undeveloped Atlantic outlook. Similarly, the Scarba, Lunga, and the Garvellachs National Scenic Area, at distances of approximately 35 to 40 kilometres, receive comparable treatment with limited recognition of potential adverse effects.

Collectively, these considerations indicate that the applicant's assessment does not fully capture the scale or significance of effects on wider seaboard designated landscapes and island communities. The omission of detailed evaluation for Ulva, the constrained assessment boundary excluding Staffa's full context, and the underestimation of impacts on other National Scenic Areas undermine the protection afforded to their natural and cultural qualities. Consequently, the assessment fails to provide a comprehensive understanding necessary to safeguard these sensitive landscapes and communities.

While the applicant's assessment attributes a Low magnitude of change to the South Tiree coastal area despite its High sensitivity at approximately 35 kilometres, this conclusion merits closer scrutiny. Tiree's landscape is uniquely defined by its exceptionally low-lying topography, with the highest elevation at Ben Hynish reaching only 141 metres. This flat, open oceanic horizon is a defining characteristic, making the introduction of turbines up to 335 metres in height unprecedented and markedly intrusive. The significant vertical scale of these structures contrasts sharply with the island's natural features, suggesting that the assessment substantially understates the true magnitude of change. Consequently, the evaluation of effects on Tiree's sensitive and distinctive landscape character appears unreliable, warranting a more rigorous and proportionate appraisal of visual and environmental impact.

While the applicant's assessment applies 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 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.

1.1.312 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy requirements governing its determination. The applicant's own assessment acknowledges substantial impacts on nationally designated landscapes, as well as on the coastal communities and heritage. However, independent evaluations of the submitted documents reveal that these impacts have been understated. Notably, the necessary heritage assessment has not been completed, and while effects upon the island communities were identified, no formal assessment of these impacts has been undertaken. In addition, the ecological safeguards required by law have not been demonstrated as achievable. It is also pertinent that only a portion of the project is currently subject to consideration by the Scottish Ministers.

Given these deficiencies, it is respectfully submitted that consent for the MachairWind Offshore Wind Farm should be refused, alongside the associated

marine licence. Should the Ministers consider otherwise, it is requested that they require the submission of further environmental information and enhanced visualisations. Moreover, the determination of the applications ought to be deferred until after a public inquiry, thereby ensuring that the concerns raised in this objection receive thorough examination. Regardless of the outcome, it is further asked that the Ministers provide explicit conclusions within their decision that address the effects upon cultural heritage and the affected island communities.

Yours faithfully,

[Redacted]

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

Member of the public 635
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.

1.1.313 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 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 under consideration fails to demonstrate compliance with the key policies set out in National Planning Framework 4 (NPF4), specifically Policies 3, 4, 7, and 11, which address biodiversity, natural places, historic assets, and energy respectively. NPF4 is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. The applicant has not provided sufficient evidence to show that these policies have been met, and the documentation reveals deficiencies and omissions in addressing these critical areas.

Policy 3 (Biodiversity) requires that developments avoid adverse impacts on biodiversity and contribute positively to its enhancement. The proposal lacks adequate assessment and mitigation measures to ensure protection or enhancement of biodiversity, thereby failing to meet this policy's requirements. Similarly, Policy 4 (Natural Places) mandates the safeguarding of natural environments and landscapes. The evidence does not demonstrate that the proposal respects or preserves the natural character of the site or its surroundings, indicating a clear conflict with this policy.

Policy 7 (Historic Assets and Places) obliges applicants to protect and conserve historic assets and their settings. The submission does not sufficiently address the potential impacts on historic assets, nor does it provide the necessary assessments or mitigation strategies to comply with this policy. This omission represents a significant failure to meet statutory and policy obligations.

Finally, Policy 11 (Energy) requires that energy considerations are integrated into development proposals in a manner consistent with sustainability objectives. The proposal does not adequately demonstrate compliance with this policy, lacking clear

evidence of how energy efficiency or renewable energy principles have been incorporated.

Given these unresolved deficiencies, omissions, and conflicts with the applicable legal and policy framework, the proposal does not satisfy the requirements of NPF4. As such, these matters weigh against the granting of planning consent. The application should therefore be refused on the basis of non-compliance with Policies 3, 4, 7, and 11 of National Planning Framework 4.

The applicant's submission fails to meet the fundamental legal requirements for environmental assessment and habitats protection as mandated by the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations. These regulations explicitly require that the likely significant environmental effects of any proposed development be thoroughly identified, assessed, and reported prior to any determination. In this case, the Environmental Impact Assessment (EIA) documentation provided is demonstrably inadequate, lacking the comprehensive analysis necessary to ascertain the full scope of environmental consequences. This deficiency undermines the statutory purpose of the EIA process, which is to inform decision-makers and the public of potential adverse effects and to enable appropriate consideration and mitigation.

Furthermore, the proposal does not comply with the Habitats Regulations, which impose a statutory duty to assess the effects of the development on European protected sites through an appropriate assessment process. The evidence submitted fails to demonstrate that the proposal has undergone the requisite Habitats Regulations Assessment (HRA) in accordance with the applicable statutory tests. Without this assessment, it is impossible to conclude that the development will not adversely affect the integrity of protected habitats, a prerequisite for lawful consent under the Conservation of Habitats and Species Regulations.

The absence of a robust and compliant EIA and HRA represents a clear procedural and substantive failure. The statutory framework is unequivocal in its requirements, and where compliance has not been demonstrated, or where evidence reveals deficiencies, omissions, or conflicts with the legal and policy framework, these shortcomings must weigh decisively against the granting of consent. The current application does not satisfy these essential legal obligations, thereby rendering any approval premature and unlawful.

In conclusion, the proposal's failure to provide an adequate environmental impact assessment and to comply with the Habitats Regulations constitutes a fundamental breach of statutory requirements. This failure alone justifies refusal of consent, as the necessary information to ensure protection of the environment and European protected sites has not been furnished. The application should therefore be rejected on these grounds.

The proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018, which requires these interests to be given due weight during the decision-making process. This statutory requirement is not demonstrated in the submitted documentation, indicating a clear deficiency in compliance with the applicable legal and policy framework. Such omissions and

failures to address the statutory duty to island communities represent a significant procedural and substantive shortcoming. In accordance with established guidance, where compliance with the Islands (Scotland) Act 2018 has not been demonstrated, or where evidence reveals deficiencies or conflicts with the legal framework, these matters must weigh against the granting of consent. Therefore, the application should be refused on the basis that it does not meet the statutory obligations to properly consider and give due weight to 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. There is a clear absence of comprehensive and conclusive evidence confirming compliance with all applicable legal and policy frameworks. Furthermore, the submitted documentation reveals deficiencies and omissions that undermine confidence in the proposal's conformity with statutory and policy obligations. 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. Accordingly, the application should be refused on the basis that the applicant has not fulfilled the necessary responsibility to prove compliance with all relevant legal and policy requirements.

1.1.314 Conflict with National Planning Framework 4 and the Development Plan

There remains considerable uncertainty as to whether the proposal complies with the impact criteria set out in NPF4 Policy 11, thereby calling into question the extent of its support for renewable energy development. NPF4 Policy 11 endorses such development only insofar as it meets specific impact tests, including those relating to communities under Policy 11(c), and to landscape, seascape, and other receptors under Policies 11(d) and 11(e). A detailed examination reveals that the proposal would result in significant adverse effects on nationally designated landscapes and seascapes. Furthermore, it has not been sufficiently demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, nor that island communities would be adequately safeguarded. In addition, the evidence submitted fails to confirm that the necessary ecological tests can be met. On this basis, the proposal conflicts with the impact criteria of NPF4 Policy 11 and thus does not benefit from its intended policy support.

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 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.

1.1.315 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.

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

The introduction of aviation and navigation lighting 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.

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

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

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

The applicant's evidence acknowledges that the heritage conclusions presented in the proposal are fundamentally reliant upon the findings of the accompanying landscape assessment. It is expressly noted that where the landscape effects have been understated, as detailed previously, the resulting heritage impact conclusions inevitably reflect and perpetuate this understatement. This interdependence between the landscape and heritage assessments is critical because any deficiencies or minimisations within the landscape evaluation directly compromise the reliability of the heritage conclusions. Consequently, the extent of harm or impact to heritage assets may be significantly greater than suggested if the landscape effects have not been fully or accurately appraised. In light of this, the credibility of the heritage impact assessment is undermined, and caution should be exercised in accepting these conclusions without further independent verification.

The 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.

1.1.317 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.

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.

There remains significant uncertainty as to whether the proposal complies with established policy and statutory duties concerning island communities. The requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan mandate that decisions be based on robust socio-economic evidence, adopting a precautionary approach where such evidence is insufficient. Additionally, NPF4 Policy 11(c) and the Islands (Scotland) Act 2018 explicitly require that the interests of island communities are thoroughly assessed and afforded appropriate weight through meaningful engagement from the earliest stages to the conclusion of the process. However, the applicant has acknowledged the need for particular scrutiny

of island communities yet failed to conduct the necessary assessment to understand the potential impacts on them. Consequently, there is no demonstrated compatibility with the principles of sustainable island communities, and the statutory duties owed to these communities have not been satisfactorily discharged. In light of these shortcomings, the proposal does not meet the required planning and statutory standards, and therefore cannot be supported.

1.1.318 Ecology, Biodiversity and Habitats Regulations

The development site encompasses Priority Marine Features and Annex I habitats, indicating the presence of ecologically significant environments within the area proposed for construction. Surrounding waters are known to support a range of protected species, including seabirds, marine mammals, and basking sharks. The introduction of large-scale activities associated with construction, operation, and eventual decommissioning would extend over several decades, imposing sustained pressures on these sensitive marine ecosystems.

Given the ecological importance of the site and the longevity of the proposed development's operational phases, there is a substantial potential for significant adverse environmental effects. The interaction between extensive human activity and the existing marine biodiversity necessitates thorough consideration, as disturbance and habitat alteration could compromise the integrity of Priority Marine Features and the viability of protected species populations. This assessment forms a critical basis for evaluating the environmental acceptability of the proposal.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically addressing the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are 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 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 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.

1.1.319 Cumulative and In-Combination Effects

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

This piecemeal approach directly contravenes established legal principles, notably those affirmed by the courts in the Raeshaw Farms case. The courts have emphasised that a project must be assessed in its entirety rather than being divided into smaller parts, each of which may appear to have less significant effects when considered in isolation. By deferring important elements to subsequent consenting processes, the present method risks underestimating the cumulative impacts and undermines the integrity of the overall evaluation.

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

The practical consequence of 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 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.

1.1.320 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 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.

1.1.321 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 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 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 that the South Tiree coastal area, situated approximately 35 kilometres from the proposed development, would experience only a Low magnitude of change fails to acknowledge the practical consequences for the island's landscape character. Given the High sensitivity attributed to this receptor, this conclusion significantly understates the actual impact, leading to an unreliable evaluation of effects.

Tiree's landscape is uniquely defined by its exceptionally low-lying topography and the dominance of sea and sky. With its highest elevation at Ben Hynish reaching merely 141 metres, the island's character depends heavily on an uninterrupted open oceanic horizon. The introduction of turbines up to 335 metres tall would create vertical structures unprecedented in this seascape, fundamentally altering the visual experience and character of Tiree's environment.

This marked contrast between the island's natural landscape and the scale of the proposed turbines demonstrates that the assessment's Low magnitude rating is inappropriate. A more robust evaluation is necessary to accurately reflect the significance of the change and to ensure that the distinctive qualities of Tiree's landscape are properly considered in decision-making.

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

The applicant's assessment 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.

1.1.322 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 636
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.

1.1.323 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.

There is significant uncertainty as to whether the proposal has adequately considered and given due weight to the interests of island communities, as mandated by the Islands (Scotland) Act 2018. The evidence does not demonstrate compliance with this statutory requirement, leaving a critical gap in the decision-making process. This failure to properly address the specific needs and

circumstances of island communities undermines the legal and policy framework established to protect their interests.

Furthermore, the absence of clear evidence confirming that the proposal aligns with the obligations under the Islands (Scotland) Act 2018 constitutes a material deficiency. Where such compliance is not demonstrated, or where omissions and conflicts with the applicable legal and policy framework are identified, these factors must weigh decisively against the granting of consent. On this basis, the proposal should be refused.

1.1.324 Seascape, Landscape and Visual Effects

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.

1.1.325 Cultural Landscape, Archaeology and Historic Environment

The cultural significance of the heritage assets affected by the proposal encompasses a complex array of qualities, including pilgrimage, arrival by sea, movement through a living cultural landscape, the interrelationships between monuments, spirituality, and the surrounding landscape and seascape. These attributes are principally experienced dynamically through movement rather than from static viewpoints, as acknowledged within the applicant's own baseline assessment. This nuanced experiential dimension implies that any assessment of heritage impact must adequately capture the full extent of these broader cultural and landscape qualities to avoid underestimating potential harm.

Historic Environment Scotland's consultation responses, as recorded in the application, underscore this point by requesting additional viewpoints to ensure that these wider qualities are properly represented in the assessment. The applicant's current approach appears insufficient in this regard, potentially overlooking significant experiential and contextual factors that contribute to the heritage assets' cultural value. It is therefore imperative that the assessment methodology be expanded to include these broader landscape and experiential elements to provide a comprehensive understanding of the proposal's impact on heritage significance.

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.

1.1.326 Effects on Island Communities, Tourism and the Local Economy

The applicant's own baseline evidence confirms that the island communities affected by the proposed development rely exceptionally heavily on visitors who are drawn by specific qualities: landscape, seascape, cultural heritage, tranquillity and remoteness. These attributes are integral to the islands' appeal and underpin their visitor economy. Any alteration or degradation of these qualities would directly undermine the economic foundations of these communities. This, in turn, threatens the provision of local services, the retention of population, and ultimately the long-term viability of the islands as sustainable communities. The proposal thus poses a significant risk to the fundamental economic and social sustainability of the island communities by impacting the very characteristics that sustain their visitor-dependent economies.

1.1.327 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.

1.1.328 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.

1.1.329 Effects on Local Area

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

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

The applicant's assessment recognises significant effects on several key areas of Mull and Ross of Mull, including the Ross of Mull South coastal area, which is rated as having High sensitivity at distances of approximately 22 to 24 kilometres and is attributed a Medium magnitude of impact. Notably, significant effects are accepted at Erraid and on the Core Paths of the Ross, with Fionnphort—serving as the gateway to Iona and the primary embarkation point for visitors—being identified as the community most directly affected by changes to visitor flows. Similarly, across Mull, significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Areas are acknowledged. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is consistently assessed as having High sensitivity across distances ranging from approximately 21 to 33 kilometres, though the applicant attributes this only a Medium magnitude of effect.

However, the applicant's reliance on viewing distance as a primary determinant of impact magnitude results in a notably limited appraisal of certain areas. For example, the Wilderness and Gribun Rocks coastal area is judged to experience a small scale of change due to its viewing distance exceeding 30 kilometres, reflecting a distance-based reasoning that fails to capture the true extent of impact. Crucially, the assessment does not provide place-based evaluations for Mull's west-facing tourism economy, wildlife boat operations, or the accommodation sectors of its western townships, all of which depend intrinsically on the Atlantic seascape that the proposed development would industrialise. This omission neglects the significant visual, economic, and community effects on these tourism-dependent communities and their surrounding designated landscapes, undermining the comprehensiveness of the applicant's impact assessment.

1.1.330 Personal Observations

In addition to the planning matters above, I am personally concerned because: I visited the islands of Mull and Iona this summer to explore their spiritual significance. Their remoteness and untouched nature allowed me to connect with the history of the islands and their monastic heritage. That contemplation would be deeply impacted by the environmental degradation represented by this project. The peace and spirituality of this landscape is an important aspect of the reason I travelled so far and at such great expense to visit these islands.

1.1.331 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 637
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.

1.1.332 Legislative and Policy Framework

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

The evidence confirms that the application does not adequately address these requirements. There is a lack of clear demonstration that the applicant has properly considered the preservation of natural beauty or the conservation of important ecological and geological features. Additionally, the proposal fails to show that reasonable mitigation measures have been identified or committed to in order to prevent or reduce harm to these protected interests. This omission constitutes a significant deficiency in the application’s compliance with the legal framework.

Given these shortcomings, the application conflicts with the statutory duties under Schedule 9 of the Electricity Act 1989. Where such compliance has not been demonstrated, and where deficiencies and omissions are evident, these matters weigh decisively against the granting of consent. Therefore, on the basis of the failure to meet the statutory requirements, the application should be refused.

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. A critical starting point in assessing this proposal is the requirement for strict compliance with the General Policies, including GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts). These policies collectively establish the statutory framework within which the marine licence application must be evaluated.

The application fails to demonstrate compliance with these essential policies. There are significant deficiencies and omissions in the evidence provided, which undermine the statutory assessment process. Notably, the application does not adequately address the requirements for co-existence with existing marine users as mandated by GEN 4, nor does it sufficiently consider the impacts on the historic environment as required by GEN 6 and the associated paragraphs. Similarly, the assessment of landscape and national scenic areas under GEN 7 is incomplete, and the natural heritage considerations under GEN 9 are not satisfactorily evidenced.

Furthermore, the application lacks robust engagement with stakeholders as prescribed by GEN 18, and the evidence base does not meet the standards of sound evidence outlined in GEN 19 and paragraph 4.81. The cumulative impacts assessment required by GEN 21 and paragraph 4.85 is also deficient, failing to provide a comprehensive understanding of the proposal's broader environmental and social effects.

Given these material shortcomings, the application does not meet the statutory requirements of the Marine (Scotland) Act 2010 nor the relevant policies of the National Marine Plan. Where compliance has not been demonstrated, and where evidence reveals conflicts with the applicable legal and policy framework, these factors must weigh decisively 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, 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 for this development.

The application fails to provide the required comprehensive 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 equivalent 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. This procedural obligation ensures that decision-

makers have a complete and robust evidential basis to evaluate environmental consequences.

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 absence of such an assessment or failure to demonstrate compliance with these tests constitutes a fundamental legal deficiency. The submitted documentation does not satisfy these requirements, as it lacks the necessary evidence to confirm that the proposal will not adversely affect the integrity of protected habitats.

Where compliance with these statutory obligations has not been demonstrated, or where the evidence reveals deficiencies, omissions, or conflicts with the relevant legal and policy framework, these shortcomings must weigh decisively against the granting of consent. In this case, the failure to provide adequate EIA and HRA documentation represents a clear breach of statutory duties, undermining the legitimacy of the application and necessitating its 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 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.

1.1.333 Conflict with National Planning Framework 4 and the Development Plan

While NPF4 Policy 11 endorses renewable energy development, this support is expressly conditional upon compliance with the policy's impact criteria, notably those concerning effects on communities, landscapes, seascapes, and other sensitive receptors as outlined in subsections (c), (d), and (e). The proposal under consideration fails to meet these essential criteria, as the adverse impacts it would generate cannot be effectively mitigated to the standard required by the policy. Unlike proposals that demonstrate robust measures to safeguard cultural heritage, ecological integrity, and community well-being, this development lacks convincing evidence of sufficient mitigation to offset its significant negative effects.

Specifically, the proposal would result in substantial harm to nationally designated landscapes and seascapes, undermining their value and character. Furthermore, there is an absence of demonstrated protection for the cultural significance of scheduled monuments and their settings, raising serious concerns about heritage preservation. The proposal also falls short of ensuring the safeguarding of island communities, a key consideration under Policy 11. Finally, the ecological assessments submitted do not establish that the necessary environmental tests can be met, leaving unresolved risks to biodiversity. Taken together, these deficiencies amount to a clear conflict with the impact criteria of NPF4 Policy 11, thereby undermining the policy's intended support for renewable energy development in this instance.

The proposal must be considered in light of the suite of relevant policies within NPF4 designed to safeguard nationally important landscapes, heritage assets, and biodiversity. As outlined, Policy 11 operates alongside Policies 4(c) and 4(d), which specifically protect National Scenic Areas and other nationally significant landscapes from substantial adverse impacts on their defining qualities. In addition, Policy 7, including subsection (h), addresses the protection of scheduled monuments and their settings, while subsections (c) and (d) focus on the broader historic environment. Policy 3 further establishes requirements for biodiversity conservation. Together, these policies form a comprehensive framework aimed at preventing unacceptable harm to designated assets.

Upon detailed examination, the proposal fails to demonstrate compliance with these interrelated policy requirements. It would result in significant adverse effects on designated landscapes and seascapes, undermining the very qualities for which these areas are nationally recognised. Furthermore, there is an absence of sufficient

evidence to confirm that the cultural significance of scheduled monuments and their settings would be adequately protected. The proposal also does not convincingly address the safeguarding of island communities, which are integral to the character and sustainability of these areas. Lastly, the ecological assessments submitted do not satisfy the necessary tests to confirm that biodiversity impacts can be appropriately mitigated or compensated.

In summary, the evidence presented establishes that the proposal conflicts with multiple NPF4 policies intended to protect designated assets of national importance. The significant adverse effects on landscapes and heritage assets, coupled with unresolved ecological and community safeguarding concerns, weigh against the proposal's acceptability under the relevant planning framework. This conflict necessitates careful reconsideration to ensure alignment with the statutory objectives of NPF4.

The 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.

1.1.334 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 visualisation materials submitted in support of the application cannot fully convey the true scale of the development as perceived by a viewer on site. This practical limitation arises because printed visualisations inherently lack the capacity to replicate the depth and spatial experience encountered in the field. Consequently, any assessment relying on these materials risks underrepresenting the visual impact experienced by observers.

Moreover, the wireline drawings included within the panoramic visualisations do not serve as independent corrections to this shortfall. Instead, they are technical renderings that share the same constraints as the photographic elements they accompany. As such, these wirelines cannot be relied upon to provide a more accurate or objective representation of the development's visual presence within the landscape.

In light of these acknowledged limitations, as set out in NatureScot's visualisation guidance adopted by the applicant, the visual evidence should be treated with caution. Decision-makers must recognise that the materials provide only an approximation of the on-site visual experience and should not be interpreted as definitive or comprehensive representations of the development's visual impact.

The applicant's evidence acknowledges that the proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration 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 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.

1.1.335 Cultural Landscape, Archaeology and Historic Environment

There is considerable uncertainty regarding the robustness of the applicant's assessment methodology as applied to the evaluation of heritage impacts in this case. While the applicant states that they have adopted Historic Environment Scotland's recognised approach for assessing effects on the setting of historic assets—a methodology developed and refined through consultation with Historic Environment Scotland—closer examination reveals shortcomings in its application. This established methodology requires a thorough evaluation not merely of visual changes, but specifically whether such changes affect the contribution that the setting makes to the cultural significance of the heritage asset, including an assessment of whether the integrity of that setting is adequately retained. Importantly, the methodology explicitly advises against equating visual change directly with adverse impact.

However, a published Methodological Audit, prepared independently in support of community objections and relying solely on the applicant's own Appendix 14.3, identifies a critical gap. While the assessment comprehensively describes visual changes—addressing aspects such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—it fails to demonstrate how the integrity of the setting has been evaluated in accordance with the applicant's accepted methodology. The key evaluative step, which would link these visual changes to any effect on the setting's integrity, is absent in all the worked examples examined by the Audit. Consequently, the conclusions drawn about the integrity of the setting being adequately retained rest on an incomplete and insufficiently substantiated analysis.

In summary, the applicant's assessment does not fully comply with the required methodology, casting doubt on the reliability of its conclusions regarding heritage impacts. This deficiency undermines confidence that the cultural significance and integrity of historic assets have been properly safeguarded.

The applicant's assessment 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 the identified deficiencies in the landscape assessment is that the heritage impact conclusions derived from it are fundamentally compromised. Specifically, where the landscape effects have been understated, as previously detailed, this understatement directly affects the reliability of the heritage conclusions that rely upon them. In other words, any analysis of heritage impacts that depends on an inaccurate or incomplete appraisal of landscape effects cannot be considered fully credible or robust.

This interdependence between landscape and heritage assessments means that the overall evaluation of the proposal's impact on heritage assets is likely to be overly optimistic. The failure to adequately capture the true extent of landscape effects results in a cascading effect, whereby the heritage conclusions fail to reflect the actual degree of harm. Consequently, decision-makers should treat these heritage impact findings with caution, recognising that their underpinning evidence may not accurately represent the real consequences for the historic environment.

The application fails to comply with essential policy requirements concerning the protection of heritage assets. Specifically, it does not satisfy the provisions set out in National Planning Framework 4 (NPF4), including Policy 7(h) relating to scheduled monuments, Policies 7(c) and 7(d) regarding setting, as well as GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. These policies collectively establish a clear framework for safeguarding the cultural significance of heritage sites.

Moreover, the applicant has not provided the necessary demonstration that the cultural significance of internationally and nationally important heritage assets and their settings will be preserved. Without such evidence, Scottish Ministers lack the assessment required to conclude that the development would not adversely affect these assets. This omission represents a fundamental gap in the application's evidence base.

In conclusion, due to the failure to meet key policy obligations for heritage protection and the absence of a comprehensive assessment, the proposal cannot be considered acceptable. It is therefore recommended that the application be refused on the grounds of non-compliance with relevant heritage protection policies.

1.1.336 Effects on Island Communities, Tourism and the Local Economy

There is considerable uncertainty regarding the potential impacts of the proposed development on the island communities in question, particularly given their unique economic and social contexts. These communities rely heavily on a visitor economy that is intimately connected to specific environmental and cultural qualities. The applicant's own baseline assessments identify these attributes as landscape, seascape, cultural heritage, tranquillity and remoteness. Any alteration to these qualities, therefore, poses a substantial risk to the fundamental appeal that attracts visitors to the islands.

The significance of these qualities extends beyond mere aesthetics; they form the cornerstone of the local economy. The island communities depend to an exceptional degree on visitors drawn by these distinctive features. If the proposal were to diminish the integrity or experience of these characteristics, the resulting effect would be a direct strike at the economic base of these communities. This, in turn, threatens not only business viability but also the maintenance of essential local services, population retention and the long-term sustainability of community life.

Given the centrality of the visitor-attracted qualities to both economic and social sustainability, any development that risks impacting them must be subject to rigorous scrutiny. The evidence indicates a clear and direct link between these qualities and the ongoing viability of the island communities. Accordingly, the potential for adverse effects should weigh heavily in the consideration of the proposal, underscoring the need for a cautious and comprehensive assessment before any approval is granted.

The applicant's own consultants acknowledged that habitability represented a potentially significant pathway through which the proposal could impact island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 focuses primarily on regional-level analysis, providing detailed examination of potential port communities but omitting an equivalent place-based evaluation of the island communities directly facing the development. Notably, the assessment concludes that these island communities exhibit low sensitivity to tourism effects, a finding reached without targeted analysis of the unique circumstances of those islands.

It is important to recognise that small island economies cannot be accurately represented by regional averages. Such economies are typically concentrated in sectors that are highly susceptible to changes in the attributes attracting visitors. Rather than diminishing sensitivity, dependence on increasing visitor numbers intensifies reliance on the environmental and social qualities that may be jeopardised by the proposal. Therefore, the conclusion of low sensitivity drawn without a place-specific assessment lacks evidential support and should be regarded as an unsubstantiated assumption.

Given these considerations, the socio-economic assessment's methodology falls short of providing a robust understanding of the potential impacts on island communities. A more nuanced, place-based approach is necessary to adequately capture the vulnerabilities and dependencies of these communities, thereby informing effective mitigation measures. Without such an approach, the assessment risks underestimating the true socio-economic consequences of the proposal for the affected island populations.

The proposal 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.

1.1.337 Ecology, Biodiversity and Habitats Regulations

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

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

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

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

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

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

compensation adequately protects the guillemot population and the overall integrity of the Special Protection Area.

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.

There remains significant uncertainty as to whether the statutory tests designed to protect internationally important habitats and species can be satisfied in this case. On the evidence submitted, including the applicant’s own derogation documents and the degree of certainty they reveal, it is clear that the applicant has not demonstrated compliance with these essential legal requirements. This fundamental failing undermines the justification for granting consent and must weigh heavily against the approval of the application.

1.1.338 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 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.

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.

1.1.339 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 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.

1.1.340 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.

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 of impacts on wider seaboard designated landscapes and island communities notably underestimates significant effects, particularly when considering the absence of mitigation measures tailored to these sensitive areas. For instance, Ulva, a community-owned island within the Loch na Keal National Scenic Area, is at the initial stages of regeneration and depends critically on the preservation of its unspoilt seascape and natural setting. Despite this, no specific assessment of effects on Ulva has been undertaken, overlooking the vulnerability of this small, re-establishing community. Similarly, Staffa, also within the same National Scenic Area and renowned as one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development. This distance exceeds the applicant's assessment boundary of around 30 kilometres requested by NatureScot, yet the applicant concludes the effects there would be small and not significant. This conclusion is drawn despite acknowledging the island's panoramic maritime qualities, thereby undervaluing the potential scale of change.

Further, the Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is considered highly sensitive at distances of roughly 28 to 32 kilometres from the development. However, the applicant attributes only a Medium to Low magnitude of effect, citing distance, apparent scale, and retained landforms as mitigating factors. The same approach is applied to the Scarba, Lunga and the Garvellachs National Scenic Area, situated approximately 35 to 40 kilometres away. This uniform treatment fails to fully recognise the intrinsic qualities of these designated landscapes, which rely on their remoteness and natural character for their value. Overall, the applicant's assessment underrepresents the significance of potential effects on both the designated landscapes and vulnerable island communities, thereby undermining the robust protection intended for 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 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 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.

1.1.341 Personal Observations

In addition to the planning matters above, I am personally concerned because: I am a sea kayaker and have spent lots of time paddling in the unspoiled waters where these turbines will be cited. They would ruin the environment and cause navigation concerns.

Based on my own local knowledge, I also wish to highlight that: The impact on sea birds including puffin would be significant. Puffin are beautiful birds and it would really upset me to think a man made structure could injure or kill a puffin.

Finally, I would also ask the Scottish Ministers to consider: Surely there is another area for these to be cited. The impact to the locals, tourists and wildlife is just not worth it.

1.1.342 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 638
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.

1.1.343 Legislative and Policy Framework

The marine licence application under consideration 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, thereby warranting refusal. The application does not satisfy the General Policies critical to this determination, 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 collectively establish the statutory framework within which authorisation decisions must be made.

The failure to demonstrate compliance with these policies constitutes a fundamental deficiency in the application. The absence of adequate evidence to address the potential impacts on the historic environment, landscape, natural heritage, and cumulative effects undermines the statutory assessment process. Furthermore, the application does not meet the requirements for meaningful engagement and the provision of sound evidence as mandated by GEN 18 and GEN 19, respectively. The statutory obligation to ensure co-existence with other marine users, as set out in GEN 4, is also unmet.

Given that authorisation decisions must be taken in accordance with the National Marine Plan unless relevant considerations indicate otherwise, and no such

considerations have been demonstrated, the identified omissions and conflicts with the legal and policy framework weigh decisively against the granting of consent. The marine licence application, therefore, fails to comply with the statutory requirements and relevant policies, and consent should be refused accordingly.

The application fails to provide the required environmental impact assessment and habitats regulations assessment as mandated by law, rendering the proposal non-compliant with statutory requirements. Under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, it is mandatory to identify, assess, and report the likely significant environmental effects of the proposal prior to any determination. Additionally, the Habitats Regulations require a thorough assessment of the proposal's 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 these assessments constitute a direct conflict with the legal and policy framework. Consequently, these failures weigh decisively against the granting of consent for the 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 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 must be met in full to ensure lawful and policy-compliant decision-making.

In this case, the applicant has failed to demonstrate compliance with all applicable legal and policy frameworks. The evidence submitted contains deficiencies and omissions that have not been adequately addressed, resulting in unresolved conflicts with statutory duties and planning policies. As such, these shortcomings weigh

decisively against the granting of consent. Without clear and comprehensive proof of compliance, the application cannot be approved.

1.1.344 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 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 applicant's evidence acknowledges that the proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration to the character of the night-time seascape throughout its stated 35-year operational life. This illumination would represent a significant visual change, introducing a new and continuous source of artificial light where none presently exists.

It is important to recognise, however, that the 35-year operational period does not limit the potential harm in policy terms. The decision to consent to this development inherently accepts that this particular seascape is appropriate for wind farm use, thereby setting a precedent regarding its suitability and future character. This policy implication extends beyond the temporal scope of the lighting itself, influencing the long-term management and designation of the seascape.

Balancing these considerations requires careful assessment of the visual impact against the benefits of renewable energy generation. While the introduction of lighting will undoubtedly alter the night-time character, the policy framework views this as part of the broader acceptance of wind farm development in the area. Consequently, decision-makers must weigh the permanent change in seascape character alongside the strategic objectives underpinning the development.

The applicant acknowledges that the proposed development results in effects which engage National Planning Framework 4 (NPF4) Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as policies GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively aim to safeguard nationally important landscapes and seascapes by ensuring that developments are carefully assessed for their impact on these valued environments.

However, the applicant has failed to demonstrate that its assessment of the scale of these accepted effects aligns with the methodology it has employed. Furthermore, there is no adequate evidence to show compliance with the policies designed to protect nationally significant landscape and seascape interests. This shortcoming raises significant concerns regarding the proposal's conformity with the established planning framework and suggests that the development would not meet the requisite standards for environmental protection set out in the relevant policies.

1.1.345 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment methodology, while adopting Historic Environment Scotland's recognised approach, falls short in demonstrating the required evaluative analysis of setting integrity, thereby undermining the reliability of its conclusions regarding heritage impacts. Although the methodology rightly distinguishes visual change from adverse impact and mandates an evaluation of how changes affect the contribution of setting to cultural significance, the applicant's operational assessment

relies heavily on descriptive elements such as visibility, distance, monument prominence, retained views, screening, and skyline occupation. However, it stops short of articulating how these factors collectively inform a judgement on whether the integrity of setting is maintained, as required by the methodology. This shortcoming is clearly identified in a published Methodological Audit, which, using the applicant's own Appendix 14.3, reveals that while heritage attributes are acknowledged, the crucial evaluative step that the methodology demands is absent from all examined examples. Consequently, without this essential analysis, the assessment's conclusions that the integrity of setting is adequately retained cannot be substantiated with confidence.

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 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 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.

1.1.346 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 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 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.

1.1.347 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 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.

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’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.

1.1.348 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 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 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.

1.1.349 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 submitted with this application is insufficient for the Scottish Ministers to make a fully informed decision. While the assessment covers various topics, it fails to investigate identified pathways to significant effects comprehensively. For example, the landscape assessment's conclusions are based on a distance pattern not supported by its own stated methodology. Similarly, the heritage assessment does not adequately apply the integrity test it claims to use, and the socio-economic assessment lacks any place-based analysis relevant to the affected islands. Furthermore, the application inappropriately relies on future assessments, post-consent plans, monitoring, and additional approvals to address uncertainties, which conflicts with the requirement under the EIA Regulations that likely significant effects be understood before determination. It is therefore clear that the applicant has not demonstrated that the environmental information provided is adequate for the Scottish Ministers to discharge their duty properly at this stage.

1.1.350 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 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 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 on designated landscapes and vulnerable island communities, resulting in inadequate protection of their natural and cultural qualities. Notably, Ulva, a community-owned island within the Loch na Keal National Scenic Area, is at the outset of its regeneration. This small, re-establishing community relies fundamentally on the unspoilt seascape and setting, yet the applicant has made no assessment of the effects on Ulva, overlooking a critical aspect of local recovery and sustainability.

Further, Staffa, also within the Loch na Keal National Scenic Area and one of Europe's most renowned small islands, lies approximately 35 kilometres from the development site. This distance exceeds the 30-kilometre range within which NatureScot requested an assessment of effects on National Scenic Area qualities. Despite acknowledging the island's panoramic maritime qualities, the applicant concludes that changes there would be small and not significant, a position that fails to fully recognise Staffa's exceptional status and sensitivity.

Similarly, the Jura National Scenic Area, situated about 28 to 32 kilometres from the site, is judged to have only medium to low magnitude effects due to distance and retained landforms, despite its designation emphasising its wild, undeveloped Atlantic outlook. The Scarba, Lunga, and Garvellachs National Scenic Area, at 35 to 40 kilometres distance, receives comparable treatment. Collectively, these assessments diminish the true scale of impact on important seaboard landscapes and island communities, thereby undermining the necessary safeguards for their distinctive environmental and cultural heritage.

The applicant's assessment significantly 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 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.

1.1.351 Personal Observations

In addition to the planning matters above, I am personally concerned because: The recklessness of this project on the fragile communities and environments in which it is situated sets a terrible precedent. This land and seascape is some of the most special in the world and it should be treasured not industrialised.

Finally, I would also ask the Scottish Ministers to consider: The Scottish government has encouraged huge amounts of tourism to the west coast, allowed for Scotland's fisheries to be sold off, allowed its land to be sold to absentee landowners - this is another example of selling to the highest bidder, and expecting the local communities to just deal with the fall out, whilst receiving no benefits.

1.1.352 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 639
Dear Sir/Madam,

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

The proposal concerns the construction of an offshore wind farm with a generating capacity in the region of 2 gigawatts. The development envisages between 91 and 144 turbines, each with a maximum height of up to 335 metres to blade tip. This facility would occupy a Windfarm Development Area extending over approximately 448 square kilometres of sea, located north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in proximity to the islands and coastal settlements of the southern Hebrides.

The following analysis outlines my objections grounded in planning and environmental considerations, assessed against the pertinent statutory and policy frameworks governing the determination of these applications. It is important to emphasise that the onus lies squarely with the applicant to furnish sufficient evidence demonstrating compliance with the applicable tests. Objectors carry no obligation to prove the contrary. Upon careful evaluation of the evidence presented, it is clear that the applicant has failed to meet this burden, and accordingly, the applications should be refused consent.

1.1.353 Seascape, Landscape and Visual Effects

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.

1.1.354 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 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.

1.1.355 Effects on Island Communities, Tourism and the Local Economy

The applicant's own baseline evidence confirms that the island communities affected by this proposal rely exceptionally heavily on visitors who are drawn specifically by the qualities of landscape, seascape, cultural heritage, tranquillity and remoteness. Any alteration to these attributes directly threatens the fundamental economic foundations of these communities. This economic impact would inevitably undermine local services, diminish population levels, and jeopardise the long-term social and economic sustainability of the islands. Given this dependency, the proposal poses a significant risk to the continued viability of these communities.

1.1.356 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.

1.1.357 Public Engagement, Site Selection and Environmental Information

The practical consequence of the insufficiency of the Environmental Impact Assessment (EIA) submitted is that the Scottish Ministers are unable to make a fully informed decision on the application. The EIA serves as the principal evidential basis for determination, and its sufficiency, rather than its extent, is the critical issue. Across key topics, the application identifies potential significant effects but either fails to investigate them comprehensively or employs methodologies that do not substantiate the conclusions reached. For example, the landscape assessment presents outcomes based on a distance pattern not supported by its own written methodology; the heritage assessment does not demonstrate the application of its

own integrity test; and the socio-economic assessment lacks place-based analysis pertinent to the affected islands. Furthermore, the reliance on future assessments, post-consent plans, monitoring, and additional approvals is inadequate, as the EIA Regulations require that likely significant effects are understood prior to determination. Consequently, the Scottish Ministers must base their decision on the evidence presently before them, not on the assumption that unresolved matters will be satisfactorily addressed later. The applicant has not demonstrated that the environmental information provided meets this requirement, rendering the EIA insufficient for the purpose of determination.

1.1.358 Effects on Local Area

The applicant's environmental and heritage impact assessment notably underestimates the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. This shortcoming undermines the reliability of the evaluation and risks overlooking critical local impacts. Islay and Colonsay lie closest to the proposed development area, which extends over 448 square kilometres immediately north-west of Islay and west of Colonsay. However, Islay is primarily treated in the application as a potential project location rather than as a distinct island community directly affected by the development. In particular, the Atlantic-facing communities of Islay, which confront the nearest edge of the development, have not been subject to any place-based assessment regarding how their setting, economy, or community life would be impacted.

For Colonsay and Oronsay, the situation is even more pressing, as their daily lives are oriented seaward towards the development array. The North Colonsay and Western Cliffs Special Protection Area, which forms part of Colonsay's coastline, is directly implicated in the project. This area 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. Such recognition highlights the presence of unavoidable adverse effects that have not been fully accounted for in the broader impact assessment, raising concerns about the adequacy of proposed mitigation measures and the overall appraisal of ecological consequences.

Moreover, Oronsay contains Oronsay Priory, a scheduled monument of national importance, which lies within the community area facing the development. The deficiencies identified elsewhere in the heritage assessment are equally applicable here, particularly regarding the evaluation of the monument's open maritime setting. This omission further weakens the heritage impact analysis and suggests that the application fails to fully appreciate the significance of cultural assets in these island communities. Taken together, these factors demonstrate a fundamental underassessment of effects on Islay, Colonsay, and Oronsay, thereby compromising the credibility of the environmental and heritage impact evaluation presented by the applicant.

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.

While the applicant acknowledges significant effects on key locations such as Erraid, Fionnphort, and core paths across Mull and the Ross of Mull, their assessment falls short in adequately addressing the full extent of visual, economic, and community impacts on these sensitive coastal areas. The Ross of Mull South coastal area is recognised as having High sensitivity at distances of approximately 22 to 24 kilometres and is attributed only a Medium magnitude of effect, despite its importance as a gateway for visitors to Iona and its direct connection to the local community reliant on tourism flows. Similarly, within Mull itself, significant effects are accepted on core recreational paths and within designated landscape areas including the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, encompassing the western waters and islands of Mull, is consistently assessed as High sensitivity at distances between 21 and 33 kilometres; yet the applicant limits the magnitude of effect to Medium, thereby underrepresenting the potential for adverse impact. Furthermore, the applicant's reliance on distance-based reasoning is evident in their treatment of the Wilderness and Gribun Rocks coastal area, where a viewing distance exceeding 30 kilometres leads them to conclude that the scale of change is small, an approach that this representation challenges as insufficient given the sensitivity of the landscape. Of critical concern is the absence of place-based assessments for the western townships of Mull, whose tourism economy, wildlife boat operations, and accommodation sectors depend heavily on the unspoiled Atlantic seascape that the proposed development threatens to industrialise. This lack of detailed, community-specific consideration undermines confidence in the applicant's evaluation and fails to address the significant

implications for these tourism-dependent coastal communities and designated landscapes.

The applicant's assessment notably underestimates the practical consequences for important designated landscapes and vulnerable island communities, risking harm to their natural and cultural qualities. Ulva, a community-owned island within the Loch na Keal National Scenic Area, is a prime example. This small, re-establishing community depends critically on the unspoilt seascape and setting that are at risk; yet, no assessment has been undertaken to consider how the development might affect its ongoing regeneration.

Similarly, the applicant's evaluation of Staffa, located approximately 35 kilometres from the development site and also within the Loch na Keal National Scenic Area, is inadequate. Despite NatureScot's guidance to assess effects up to 30 kilometres, the applicant dismisses the significance of impacts beyond this range, concluding only a small scale of change and non-significant effect at Staffa. This is inconsistent with their own recognition of the island's panoramic maritime qualities and fails to fully acknowledge the potential extent of visual and experiential impacts on one of Europe's most celebrated small islands.

The assessment of the Jura National Scenic Area and the Scarba, Lunga and the Garvellachs National Scenic Area similarly downplays potential impacts by attributing Medium to Low magnitudes of effect based mainly on distance and retained landforms. However, these designations rest on the wild, undeveloped character of their Atlantic outlooks, which may be compromised by changes in seascape character even at distances of 28 to 40 kilometres. Together, these omissions and underestimations weaken the protection afforded to these landscapes and island communities, which rely on the preservation of their distinctive natural and cultural environments.

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 applies a distance-based moderation to mitigate perceived effects on visual receptors, yet this approach is insufficient in addressing the specific circumstances of mainland and island communities directly facing the development. For example, Gigha, a community-owned island emblematic of island regeneration, lies to the east of the proposed site and depends heavily on its

carefully balanced social and economic fabric. The absence of any examination of impacts upon Gigha's community and economy reveals a significant omission in the assessment, undermining its comprehensiveness. Similarly, Ardnamurchan Point, as the most westerly point of the British mainland, offers expansive panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas represent precisely the type of receptor for which the applicant's distance-based mitigation is claimed, yet their significance is not adequately considered.

Furthermore, the west coast of Kintyre comprises a succession of communities whose identity, character, and visitor economy are intrinsically linked to the open Atlantic seaboard facing Islay, Jura, and the surrounding waters. The Treshnish Isles and other small islands, together with adjacent mainland coasts that have direct views toward the development area, share this reliance on the seascape. The failure to assess the effects on these interconnected communities and landscapes results in a substantial gap in understanding the full implications of the proposal. Without a detailed appraisal of these receptors, the assessment cannot be regarded as comprehensive or robust, and decision-making is consequently compromised.

There remains 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.

1.1.359 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 640
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.

1.1.360 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 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 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 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.

1.1.361 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 applicant's assessment is that the true impact on the heritage assets may be underestimated. The applicant's own baseline acknowledges that the cultural significance of the affected heritage assets is deeply rooted in dynamic qualities 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 attributes are fundamentally experienced through movement rather than from static viewpoints, indicating that any assessment focusing solely on fixed perspectives risks missing critical elements of the heritage value.

Furthermore, Historic Environment Scotland's consultation responses, as recorded within the application, explicitly requested additional viewpoints to ensure these wider experiential qualities were adequately captured. This highlights that the current assessment does not fully represent the complexity of the cultural significance identified. A more comprehensive approach is therefore necessary to properly

evaluate the heritage impacts in a manner consistent with the qualities that underpin the significance of these assets. Without this, the assessment may fail to safeguard the holistic values that contribute to the heritage assets' importance.

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.

1.1.362 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 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.

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.

1.1.363 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 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.

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.

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.

1.1.364 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 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 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.

1.1.365 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 in support of the application fails to provide sufficient environmental information to enable Scottish Ministers to make a fully informed decision. While the assessment is extensive in scope, it is not the breadth but the adequacy of the evidence that is decisive. The application identifies potential significant effects across multiple topics but either does not investigate these effects comprehensively or relies on methodologies that do not justify the conclusions drawn. For example, the landscape assessment's outcomes follow a distance-based pattern not supported by its own stated methodology; the heritage assessment does not adequately apply its integrity test; and the socio-economic assessment lacks place-specific analysis pertinent to the affected islands. Such deficiencies undermine the reliability of the mitigation measures proposed and their capacity to address environmental concerns effectively.

Furthermore, the application depends in part on future assessments, post-consent plans, ongoing monitoring, and additional approvals to manage impacts. However, these commitments do not satisfy the requirements of the EIA Regulations, which mandate that likely significant effects be clearly understood at the point of decision. The Scottish Ministers must base their determination solely on the evidence before them, without presuming that outstanding issues will be resolved later. The applicant has not demonstrated that the environmental information submitted meets this essential standard, thereby rendering the EIA insufficient for decision-making purposes.

1.1.366 Effects on Local Area

The proposed development encompasses a substantial area of 448 square kilometres immediately north-west of Islay and west of Colonsay, placing it in close proximity to these islands. Despite this, the applicant's assessment predominantly considers Islay in terms of its potential as a project location rather than as a distinct island community directly affected by the development. The Atlantic-facing communities of Islay, which confront the nearest edge of the development zone, have not been subject to any detailed, place-based evaluation of the likely impacts on their setting, local economy, or community life. This omission raises significant concerns about the adequacy of the environmental and heritage impact evaluation provided.

Colonsay and Oronsay, whose daily lives are intimately connected to their seaward outlook facing the proposed array, are similarly underassessed. The North Colonsay and Western Cliffs Special Protection Area lies along Colonsay's coastline and is central to the applicant's derogation case and compensation proposals, implicitly acknowledging that harm to the internationally protected seabird populations at these cliffs cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance, is situated within this community, yet the identified deficiencies in the heritage assessment apply equally to its open maritime setting. Collectively, these factors demonstrate that the applicant's evaluation fails to capture the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby undermining the reliability of the overall impact assessment.

The applicant's assessment acknowledges that the Sound of Iona holds high sensitivity, with direct orientation towards the proposed development area and extensive visibility. The Coastal Character assessment identifies a large geographical extent of change, noting effects on the ferry crossing between Fionnphort and Iona, with an overall effect described as moderate and significant. The turbines would be visible across approximately 39 degrees of the horizon, at a distance of about 21 kilometres. Similarly, the West Coast of Iona is recognised as highly sensitive, with widespread visibility, and the applicant accepts significant effects on residents and visitors across much of the island, including at Dùn Ì, its highest point.

However, this acknowledgement understates the scale and significance of the impacts. Iona's monastic landscape, which includes the Abbey, the Nunnery, and the high crosses, is of heritage importance at an international level. The applicant's own baseline recognises the significance of this heritage in terms of pilgrimage, arrival by sea, and movement through the landscape. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet the applicant has failed to provide visualisations from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, a crucial vantage point for assessing heritage impact.

Community concerns further highlight the inadequacy of the applicant's evaluation. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal. Despite this, habitability—identified by the applicant's consultants as a potential pathway of effect on the community—was never formally assessed. This omission undermines the accuracy and completeness of the social impact evaluation.

The perceived scale of the turbines is also underestimated. For comparison, Ben Hynish on Tiree, standing 141 metres high and visible from Iona at approximately 33 kilometres, would be overtopped by the largest turbines by around 194 metres, despite the turbines being located roughly two-thirds of that distance from Iona. This illustrates that the visual dominance of the turbines would be substantially greater than implied.

In conclusion, the applicant's assessment significantly underrepresents the visual, community, and heritage impacts on Iona, compromising the reliability of the environmental and social impact evaluation and warranting a more thorough and robust analysis.

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

In terms of landscape and visual effects, the applicant concedes significant impacts on Core Paths and within the Central, South, and West Mull Local Landscape Areas.

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

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

The applicant's assessment of the 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 characterises the South Tiree coastal area as possessing High sensitivity at a distance of approximately 35 kilometres while

attributing a Low magnitude of change to the proposed development. This classification underpins the overall evaluation of the effects on Tiree's landscape character. However, this Low magnitude conclusion appears to underestimate the true extent of visual and perceptual impact that would arise from the introduction of large-scale turbines into this setting.

Tiree's landscape is uniquely defined by its exceptional low-lying topography, where the prominence of sea and sky shapes its distinctive character. The island's highest elevation, Ben Hynish, reaches only 141 metres, emphasising the openness and expansive nature of the oceanic horizon. The proposed turbines, reaching heights of up to 335 metres, would therefore represent unprecedented vertical elements within this seascape. Their scale and prominence would disrupt the island's characteristic sense of openness and natural order, introducing features that are entirely discordant with the existing landscape.

Given this context, the conclusion that the magnitude of change would be Low does not adequately reflect the sensitivity of Tiree's receptor or the scale of change introduced. The applicant's evaluation consequently presents an unreliable estimate of effects, failing to capture the significant alteration that such structures would impose on the island's sensitive and distinctive landscape character. This underestimation warrants careful reconsideration to ensure that the assessment fully recognises the true magnitude of impact on Tiree.

The applicant's assessment notably omits consideration of Gigha, a community-owned island that has become a national emblem of island regeneration following its purchase by local residents. Positioned to the east of the proposed development, Gigha's community and economy are delicately balanced and closely tied to the surrounding waters, yet no evaluation of potential impacts on this sensitive island has been provided.

Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers sweeping panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward vistas are precisely the type of visual receptor that the applicant's distance-based moderation approach seeks to diminish, raising concerns that important effects on this key viewpoint have been underestimated or overlooked.

Moreover, the chain of communities along the west coast of Kintyre depends heavily on the character and visitor economy shaped by the open Atlantic seaboard, encompassing views towards Islay, Jura, and beyond. The Treshnish Isles and neighbouring small islands and mainland coasts with direct sightlines to the development site share this intrinsic connection to the seascape, yet their potential exposure and economic reliance have not been adequately assessed. This lack of comprehensive evaluation compromises the robustness of the applicant's overall seascape and socio-economic impact appraisal.

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.

1.1.367 Personal Observations

In addition to the planning matters above, I am personally concerned because: The proposal impacts large swathes of Argyle and Bute's islands and costal communities which are heavily dependant on mature and ecological based tourism. Impacts inthe island and mainland communities lowering tourism numbers across the county will impact all related communities. We rely on the whole area being valued by domestic and international travellers arriving into and traveling through the area.

An impact on the wildlife and the environment which the array is situated within an area of outstanding importance to in turn impacts visiting numbers and therefore impacts the economy across the county.

From a stewardship perspective I highly value the heritage and ongoing intrinsic value of the island culture within the wider Scottish culture and it needs to be protected and preserved as the unique cultural wealth it brings to all of Scotland and this is recognised by the Scottish government who has set aside protections and investments to preserve this unique culture. The wider community impacts on these sensitive areas and their way of life should and can not be unde estimated and the delicate balance for maintaining these communities will be put at risk by scale and inappropriate situation of this project and must be reconsidered.

Based on my own local knowledge, I also wish to highlight that: The areas between Mull , Iona , Coll and Tiree are some of our most important marine environments attracting many species of whales, dolphins and most importantly a large portion of the worlds basking shark population that return each year and is one few places where such numbers can be observed. All of these species are sensitive to disturbance and and we need much more extensive studies and reports to assess the impact of the programme especially given its scale. To disturb the basking shark population would have world wide implications and must be given much more in depth consideration s.

1.1.368 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 641
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.

1.1.369 Legislative and Policy Framework

The application before the Scottish Ministers raises significant uncertainty regarding compliance with the statutory duties imposed by Schedule 9 of the Electricity Act 1989. This Schedule explicitly requires the applicant to have regard to the desirability of preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, as well as protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Moreover, the applicant must take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The Scottish Ministers, in their determination, are equally bound to have regard to these statutory duties.

In the present case, the application fails to demonstrate compliance with these requirements. There is a lack of clear evidence that the applicant has adequately considered the preservation of natural beauty or the conservation of flora, fauna, and geological or physiographical features of special interest. Similarly, the protection of sites, buildings, and objects of architectural, historic, or archaeological interest has not been sufficiently addressed. The absence of reasonable steps to mitigate adverse effects further compounds these deficiencies.

Given these shortcomings, the application does not meet the statutory obligations set out in Schedule 9 of the Electricity Act 1989. Where such compliance has not been demonstrated, and where evidence identifies deficiencies and omissions in

relation to the applicable legal and policy framework, these matters must weigh against the granting of consent. Therefore, the application should be refused on the basis that it fails to satisfy the statutory duties under Schedule 9.

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

Furthermore, the evidence identifies clear deficiencies and omissions in the application's adherence to the applicable legal and policy framework. Where compliance has not been demonstrated, or where conflicts with statutory requirements and National Marine Plan policies exist, these shortcomings must weigh decisively against the granting of consent. The application's failure to meet these essential criteria means that it cannot be considered consistent with the statutory framework governing marine licensing in Scotland. Consequently, the marine licence should be refused on the grounds that the proposal does not satisfy the necessary legal and policy standards established by the Marine (Scotland) Act 2010 and the National Marine Plan.

The applicant's submission acknowledges that National Planning Framework 4 (NPF4) is a significant material consideration and that its policies must be applied alongside relevant statutory duties and legislative requirements. Specifically, the proposal engages Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy) of NPF4. However, the evidence before the determining authority demonstrates that the proposal fails to comply with these key policies.

Firstly, with regard to Policy 3 (Biodiversity) and Policy 4 (Natural Places), the applicant has not demonstrated compliance. The evidence identifies deficiencies and omissions in the assessment and protection of biodiversity and natural places. These shortcomings mean that the proposal does not meet the statutory and policy requirements to safeguard and enhance biodiversity and natural environments as mandated by NPF4.

Secondly, concerning Policy 7 (Historic Assets and Places), the proposal similarly fails to demonstrate that it will preserve or enhance historic assets and places. The evidence reveals conflicts with the applicable legal and policy framework protecting heritage, with no adequate mitigation or justification provided to address the adverse impacts identified.

Thirdly, in relation to Policy 11 (Energy), the applicant has not shown that the proposal aligns with the energy policies set out in NPF4. The evidence highlights omissions and uncertainties in the energy assessment, indicating non-compliance with the policy's requirements.

Where compliance with these policies has not been demonstrated, and where the evidence identifies deficiencies, omissions, or conflicts with the applicable legal and policy framework, these matters weigh decisively against the granting of consent. The proposal's failure to satisfy the requirements of Policies 3, 4, 7, and 11 of NPF4 constitutes a fundamental breach of the statutory and policy framework that must be afforded significant weight in the determination of this application. Consent should therefore be refused.

The submitted application fails to provide an adequate Environmental Impact Assessment (EIA) as required by The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations. These regulations mandate that the likely significant environmental effects of the proposal must be identified, assessed, and reported prior to any determination. The absence of a comprehensive and compliant EIA means that the decision-making authority cannot properly evaluate the environmental consequences of the development, which is a fundamental legal requirement. This deficiency alone constitutes a clear failure to meet statutory obligations and weighs decisively against the granting of consent.

Furthermore, the application does not satisfy the requirements of the Habitats Regulations, which demand that the effects of the proposal on European protected sites be assessed in accordance with the applicable statutory tests. The evidence confirms that compliance with these regulations has not been demonstrated, and there are identifiable omissions and conflicts with the legal and policy framework governing protected habitats. Such shortcomings undermine the integrity of the assessment process and contravene established environmental protection standards. In line with the statutory guidance, these unresolved issues must be given significant weight in the determination process, resulting in a firm objection to the proposal.

The proposal fails to properly consider and weigh the interests of island communities as required by the Islands (Scotland) Act 2018, undermining compliance with a statutory duty integral to the decision-making process. The Act explicitly mandates that the interests of island communities must be given due weight, yet the submitted documentation does not demonstrate adherence to this requirement. This omission constitutes a clear deficiency and procedural failing within the application. As established by the Act and confirmed in the approved 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's failure to meet the statutory obligations under the Islands (Scotland) Act 2018 represents a significant legal and policy conflict that should result in refusal.

The applicant has failed to meet 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 clearly established and rests solely with the applicant, who must provide conclusive proof that every applicable legal and policy framework has been satisfied.

In this case, the evidence submitted is deficient and incomplete, falling short of the necessary standard to confirm compliance. The absence of such demonstration, coupled with identified omissions and unresolved conflicts with the legal and policy framework, undermines the validity of the application. These shortcomings are not minor procedural errors but substantive failures that directly contravene the established requirements for planning consent.

Accordingly, these unresolved evidential deficiencies and conflicts must be given significant weight against the granting of consent. Without clear and convincing evidence that all statutory and policy obligations have been met, the application cannot lawfully proceed. Therefore, the proposal should be refused on the basis that the applicant has not fulfilled the essential evidential burden required to demonstrate compliance.

1.1.370 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 practical consequence of relying on the visualisation materials provided is that they may not accurately convey the true scale and impact of the proposed development as experienced on site. NatureScot's visualisation guidance, which the applicant follows, explicitly states that printed visualisations are unable to fully

replicate the scale perceived by a viewer in the field. This limitation means that stakeholders and decision-makers reviewing the visual materials might underestimate or misinterpret the extent to which the development would be visible and affect the surrounding landscape.

Furthermore, the wireline drawings included within the same panoramic projections are bound by the same constraints as the accompanying photographic images. These wireline drawings serve as a technical rendering within the visualisation rather than acting as an independent corrective tool to address any deficiencies in the photographic representation. Consequently, these visual aids should be regarded with caution, as they do not provide a definitive or fully reliable depiction of the visual effects. This inherent limitation in the visual evidence advises careful consideration of on-site conditions and supplementary assessments when evaluating the visual impact of the proposal.

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.

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.

1.1.371 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 applicant's baseline assessment recognises that the cultural significance of the heritage assets in question arises not merely from isolated features but from a broader experiential context. This includes elements such as pilgrimage routes, arrival by sea, movement through an active cultural landscape, and the interrelationships between monuments, spirituality, and the encompassing landscape and seascape. Crucially, these attributes are experienced dynamically through movement rather than from static viewpoints, highlighting the importance of capturing a sense of journey and lived experience in any heritage impact assessment.

Despite this recognition, Historic Environment Scotland's consultation responses, as recorded within the application documentation, indicate that the assessment has not fully addressed these wider experiential qualities. The request for additional viewpoints underscores a concern that the applicant's evaluation may inadequately represent the cultural landscape's holistic significance. This suggests that without a more comprehensive approach to capturing the dynamic and interconnected nature of the heritage assets, the assessment risks underestimating the true impact on their cultural value.

The 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 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.

1.1.372 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 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.

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

The applicant has failed to demonstrate compliance with the statutory tests designed to safeguard internationally important habitats and species. This conclusion is drawn from a thorough examination of the submitted evidence, including the applicant's own derogation documents, which collectively reveal a lack of sufficient certainty that these legal requirements can be met. Without clear satisfaction of these tests, the application does not fulfil the necessary legal criteria to justify consent. Consequently, in light of this demonstrable shortfall, the case for granting planning permission is fundamentally undermined and must be refused.

1.1.373 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 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.

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.

1.1.374 Public Engagement, Site Selection and Environmental Information

When comparing the consultation process for this application with the standards embodied in GEN 18 of the National Marine Plan and the principles of effective public participation as set out in the Aarhus Convention, it is clear that the affected communities have not been afforded a realistic opportunity to engage meaningfully with decisions of this scale. While the applicant has had years to prepare their case, supported by substantial professional and financial resources, the public has faced significant constraints. The consultation period coincided with the busiest months of the year for island communities, a time when residents are engaged continuously in the visitor season and when access to specialist advice is most limited. This imbalance undermines the effectiveness and fairness of the participation process.

The deficiencies observed at both the plan and site-selection stages have persisted into the application phase, further diminishing the legitimacy of the site-selection process. The application documentation runs to many thousands of pages of technical material, creating a formidable barrier for meaningful public involvement under the conditions imposed. Given the weight the applicant seeks the Scottish Ministers to place on the site-selection process, the shortcomings in public participation are directly material and must be taken into account. It is imperative that Ministers bear these factors firmly in mind when considering the representations

made, as the integrity of the decision-making process depends on adherence to established standards of consultation and public engagement.

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.

1.1.375 Effects on Local Area

There is significant uncertainty regarding the applicant’s assessment of the direct and substantial effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Notably, Islay and Colonsay are the closest inhabited islands to the proposed development area, which extends over 448 square kilometres immediately north-west of Islay and west of Colonsay. However, the application approaches Islay primarily as a potential project location rather than as an affected island community in its own right. This perspective results in an absence of any place-based evaluation of how the development might impact Islay’s Atlantic-facing communities, their setting, economy, or community life, thereby undermining the reliability of the environmental and heritage impact appraisal.

For Colonsay and Oronsay, the situation is no less concerning. The seaward outlook, which profoundly shapes daily life on these islands, directly faces the proposed array. Of particular importance is the North Colonsay and Western Cliffs Special Protection Area, located along Colonsay’s own coastline. This site is central to the applicant’s derogation case and compensation plan, acknowledging that harm to the internationally protected seabird populations of these cliffs cannot be ruled out. Such an admission highlights the potential for significant and irreversible environmental effects, yet the wider implications for the community and natural heritage appear insufficiently addressed.

Moreover, Oronsay Priory, a scheduled monument of national importance, is situated within this same community area. The concerns previously identified regarding gaps in the heritage assessment apply equally to the evaluation of the Priory's open maritime setting. The failure to adequately consider the impact on this nationally significant heritage asset further calls into question the thoroughness and robustness of the applicant's environmental and heritage impact evaluation. Taken together, these points indicate that the assessment underestimates the magnitude and significance of effects on these island communities, thus raising serious doubts about the overall reliability of the application's conclusions.

While 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 adequately recognise the significant visual, economic, and community impacts that the proposed development would impose on the coastal communities and landscapes of Mull and Ross of Mull. At the Ross of Mull South coastal area, which is of High sensitivity at distances of approximately 22 to 24 kilometres, the applicant acknowledges significant effects at Erraid and on the Core Paths of the Ross. Crucially, Fionnphort—serving as the gateway to Iona and the principal embarkation point for visitors—is recognised as experiencing significant effects, yet no place-based assessment has been provided for this community that is directly dependent on visitor flows. Across Mull more broadly, the applicant accepts significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Areas. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is correctly assessed as of High sensitivity over distances ranging from 21 to 33 kilometres; however, the applicant attributes only a

Medium magnitude of effect, thereby underestimating the visual impact. Furthermore, the approach to the Wilderness and Gribun Rocks coastal area exemplifies a reliance on distance-based reasoning: despite viewing distances exceeding 30 kilometres, the applicant judges the scale of change to be small, a conclusion that does not sufficiently account for the sensitivity of the landscape or the cumulative impact. The west-facing tourism economy of Mull, including its wildlife boat operations and accommodation providers in western townships, depends fundamentally on the unspoilt Atlantic seascape that the development would industrialise. Notably, none of these communities has been subjected to a place-specific assessment, leaving a significant gap in understanding the full extent of the adverse effects. In summary, the applicant's assessment inadequately addresses the scale and significance of impacts on designated landscapes and tourism-dependent communities in Mull and Ross of Mull, thereby underrepresenting the practical consequences for these sensitive coastal areas.

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

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

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

The applicant's reliance on a distance-based 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.

1.1.376 Personal Observations

In addition to the planning matters above, I am personally concerned because: These monstrosities will have a Massive affect on every aspect of life on island communties, ecological/marine habitat communties, and surrounding mainland communities. They will undoubtedly have both an environmentally and socially devastating 'effect' on fragile communties considered cultural heritage sites, internationally recognized places of spiritual pilgrimage, and most concerningly will cause massive destruction with local marine /ecosystems and likely affect fragile ground water.

Based on my own local knowledge, I also wish to highlight that: All of the above islands are fragile places, both ecologically and culturally. Why choose some of the last 'wilderness' area left in all of the UK to erect these monstrosities?

Finally, I would also ask the Scottish Ministers to consider: If you give this project the green light, you will be directly responsible for not only the destruction of priceless ecosystems, but
the destruction of
trusted/sacred relationships
inherent to island life. Not to mention utter ruin of the tourist industry many islanders rely upon for their
very survival. Because no one is going to fork out thousands of pounds/dollars/yen to watch/listen to massive windmills whirring out their back door 24/7 when they're seeking peace and quiet. And why Netherlanders had enough foresisht to install their massive windfarms off the main coast, away from both tourist destinations and particularly fragile
ecosystems.

1.1.377 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 642
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.

1.1.378 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to meet the impact criteria outlined in NPF4 Policy 11, which explicitly supports renewable energy development only insofar as it complies with specified protections. Notably, Policy 11(c) requires safeguarding communities from adverse effects, while Policies 11(d) and 11(e) impose strict controls to prevent unacceptable impacts on landscape, seascape, and other sensitive receptors. The evidence demonstrates that the proposal would cause significant adverse effects on nationally designated landscapes and seascapes, thereby breaching these critical provisions.

Furthermore, the submission does not satisfactorily address the protection of cultural heritage or community interests. The cultural significance of scheduled monuments and their settings remains unprotected, and the proposal fails to provide sufficient assurance that island communities would be safeguarded from detrimental impacts. In addition, the ecological assessments fall short of demonstrating that the necessary environmental tests can be met. Taken together, these shortcomings establish clear conflicts with the impact criteria of NPF4 Policy 11, undermining the policy’s conditional support for the development in question.

The proposal fails to comply with multiple national planning 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.

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.

1.1.379 Seascape, Landscape and Visual Effects

The applicant’s assessment methodology fails to define a distance threshold beyond which major effects cease, yet their own analysis reveals a consistent pattern: no highly sensitive receptor beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of sensitivity or visibility. This is evident in the applicant’s documentation, which notes that for a coastal area over 30 kilometres away, the scale of change is judged small due to viewing distance, and the Landscape Character synthesis categorises magnitude as High within about 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. Consequently, the protective tests rely on inputs that systematically moderate magnitude at precisely the distances where the most sensitive designated landscapes are situated. This undermines the reliability of the conclusions presented to the Scottish Ministers, as the true effects on these landscapes are likely understated.

The practical consequence of relying on the visualisation materials submitted in support of the assessment is that they may not accurately convey the true scale of the development as experienced on site. NatureScot's visualisation guidance, which the applicant follows, explicitly recognises that printed visualisations cannot fully replicate the scale perceived by a viewer in the field. This inherent limitation means that any conclusions drawn solely from these materials should be treated with caution, as they risk understating or misrepresenting the visual impact.

Moreover, the wireline drawings included within the same panoramic projections do not overcome these deficiencies. Rather than serving as an independent means to correct or clarify the photographic visualisations, they are technical renderings subject to the same constraints. As such, they should be understood as part of the overall visualisation package, sharing its limitations, rather than as a definitive or corrective representation of the development's visual effects. This understanding is important for a balanced appraisal of the visual evidence presented.

The 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 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.

1.1.380 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 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 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 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.

1.1.381 Effects on Island Communities, Tourism and the Local Economy

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

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

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

The applicant's own consultants acknowledged that habitability 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.

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.

1.1.382 Ecology, Biodiversity and Habitats Regulations

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

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

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

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan focused specifically on the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are typically prepared for circumstances where an adverse effect on the integrity of a protected site cannot be ruled out. Their inclusion in the application is therefore a material consideration, signalling the applicant's acknowledgement of potential impacts.

Importantly, the applicant's approach concedes that Scottish Ministers may reach a different conclusion regarding adverse effects on the protected site's integrity. This recognition underscores that the submitted derogation and compensation documents are intended to address and mitigate potential impacts in accordance with relevant provisions, rather than to pre-empt regulatory assessment. As such, these documents form a critical component of the application's approach to compliance with protection requirements.

The applicant's evidence clearly establishes the rigorous legal framework established by the Habitats Regulations, which governs any development proposals potentially affecting protected habitats and species. Consent for such developments can only be granted if the competent authority has unequivocally ascertained that the

proposal will not adversely affect the integrity of the protected site, or if the strict derogation tests are satisfied. This places a very high evidential standard on the applicant, requiring that no reasonable scientific doubt remains regarding the absence of adverse effects. Importantly, the responsibility to demonstrate compliance with these statutory tests lies firmly with the applicant. Furthermore, mitigation measures, compensation proposals, and commitments to future monitoring, while relevant, cannot alone satisfy the statutory requirements or substitute for the necessary scientific certainty.

This stringent legal requirement is supported and reinforced by the broader policy framework encompassing GEN 9 and GEN 13 of the National Marine Plan, alongside Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). These policies collectively emphasise the imperative to safeguard protected habitats and species by ensuring that developments conform fully to the Habitats Regulations' standards before consent is granted. Consequently, any planning decision must be grounded in robust scientific evidence demonstrating no adverse effects on site integrity, reflecting the fundamental principle that environmental protection in these contexts cannot be compromised or presumed through future actions. This framework underscores the necessity for the competent authority to exercise rigorous scrutiny and for applicants to meet their substantial evidential burden in full.

The 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.

1.1.383 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 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 demonstrate compliance with GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the Environmental Impact Assessment Regulations regarding project splitting. Specifically, the cumulative and in-combination effects of the proposal, as well as the impacts of the project in its entirety, have not been reliably identified or assessed. This omission raises significant concerns about the adequacy of the environmental appraisal and undermines the robustness of the decision-making process. Consequently, it is essential that the determination explicitly addresses the treatment of any deferred works to ensure full consideration of all potential effects, in accordance with the relevant policy and regulatory requirements.

1.1.384 Public Engagement, Site Selection and Environmental Information

The consultation process associated with the site-selection for this proposal exhibits significant deficiencies that compromise the legitimacy of the decision-making framework. The applicant seeks substantial weight to be afforded to the site-selection process by the Scottish Ministers, rendering the quality of public participation therein directly material. However, these deficiencies evident at the plan and site-selection stages have persisted into the application phase. The application itself comprises many thousands of pages of technical documentation, with the consultation period coinciding with the busiest months for island communities. During this visitor season, residents engage in continuous work and access to specialist advice is notably limited, whereas the applicant has had years, alongside considerable professional and financial resources, to prepare its case.

Such circumstances fall short of the standards mandated by GEN 18 of the National Marine Plan and the principles of effective public participation enshrined within the Aarhus Convention. Those affected by this decision have not been afforded a realistic opportunity to engage meaningfully with a matter of such magnitude. It is therefore incumbent upon the Ministers to bear these shortcomings firmly in mind when weighing the representations submitted, recognising that the process has not met the requisite standards of effective public participation.

The 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.

1.1.385 Effects on Local Area

The applicant's environmental and heritage impact assessment fails to adequately address the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. This underassessment has practical consequences, as it undermines the reliability of the evaluation upon which planning decisions must be based. Despite Islay and Colonsay being the closest inhabited islands to the development area—which lies immediately north-west of Islay and west of Colonsay—the application primarily considers Islay only as a potential project location. It neglects to assess Islay as an affected island community in its own right. Notably, Islay's Atlantic-facing communities are situated nearest to the edge of a 448 square kilometre development area, yet no place-based assessment has been undertaken to evaluate how the development might affect their setting, local economy, or community life.

The omission is equally apparent with respect to Colonsay and Oronsay, where the seaward outlook forms a defining feature of daily life and faces the proposed development directly. The North Colonsay and Western Cliffs Special Protection Area, which forms part of Colonsay's own coastline, is central to the applicant's derogation case and compensation plan. This area represents the clearest acknowledgment within the application that harm to the internationally protected seabird population inhabiting these cliffs cannot be ruled out. Such acknowledgement further highlights the need for a thorough, place-specific assessment of the potential impacts on Colonsay's natural environment, which the current submission does not provide.

Moreover, Oronsay Priory, a scheduled monument of national importance, lies within this community's area and benefits from statutory protection. The heritage assessment's identified gaps apply fully to the evaluation of the monument's open

maritime setting, which remains insufficiently considered. The failure to robustly assess the effects on this nationally significant heritage asset, alongside the broader community and environmental concerns for Islay, Colonsay, and Oronsay, calls into question the completeness and credibility of the overall impact evaluation presented by the applicant. Without rectifying these deficiencies, the application cannot be regarded as adequately addressing the interests of these island communities or the protection of their valued heritage and environment.

The applicant's assessment significantly underestimates the scale and importance of visual, community, and heritage impacts on Iona, leading to an incomplete evaluation of environmental and social consequences. The Coastal Character assessment identifies the Sound of Iona as having high sensitivity, with a direct orientation towards the development area and extensive visibility. The geographical extent of change is large, with turbines visible across approximately 39 degrees of the horizon at a distance of about 21 kilometres, producing a moderate and significant overall effect. Similarly, the West Coast of Iona is highly sensitive with widespread visibility, and the applicant acknowledges significant effects for residents and visitors throughout much of the island, including at Dùn Ì, Iona's highest point.

Iona's monastic landscape, comprising the Abbey, the Nunnery, and the high crosses, holds heritage of international importance. The applicant's baseline recognises the significance of pilgrimage, arrival by sea, and movement through the landscape to this heritage. Historic Environment Scotland requested additional viewpoints, including one from the ferry crossing itself, but no visualisation has been provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, a notable omission given the heritage sensitivity. Community concerns are also profound: a household consultation revealed that 92 per cent of respondents on Iona object to the proposal. Despite the applicant's consultants identifying habitability as a potential pathway of effect on this community, no assessment of this factor has been undertaken.

To contextualise the perceived scale of visual impact, the largest turbines would be approximately 194 metres taller than Ben Hynish on Tiree, a familiar landmark standing 141 metres high and visible from Iona at about 33 kilometres. The turbines would be two-thirds of that distance away yet dominate the skyline. This comparison underscores the significant underestimation in the applicant's visual impact assessment.

In conclusion, the applicant's evaluation fails to fully capture the extensive and significant effects on Iona's sensitive landscapes, heritage assets, and community wellbeing, thereby compromising the accuracy and reliability of the environmental and social impact assessment.

The applicant's assessment acknowledges 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.

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

While the applicant's assessment 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 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.

1.1.386 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 coastal communities and their heritage. However, independent scrutiny of the applicant's documentation reveals that these effects have been understated, and that an essential heritage assessment has not been conducted. Furthermore, while the detrimental impacts on the island communities have been identified, no formal assessment of these effects has taken place. Additionally, the ecological tests mandated by policy remain unproven as achievable. It is also notable that the application before the Scottish Ministers represents only a portion of the entire project.

Given these substantial 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 approval, it is requested that they require the submission of further environmental information alongside enhanced visualisations. Moreover, determination of the applications should 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 requested that the Ministers provide explicit conclusions within their decision, 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 643
Dear Sir/Madam,

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

The development in question involves the construction of an offshore wind farm with an installed capacity of approximately 2 gigawatts. This scheme comprises between 91 and 144 turbines, each potentially reaching up to 335 metres to blade tip. The site is situated within a designated Windfarm Development Area spanning roughly 448 square kilometres of sea, located to the north-west of Islay and west of Colonsay. Notably, the location lies approximately 21 kilometres from Iona and is in close proximity to the islands and coastal communities of the southern Hebrides.

This objection is grounded in the planning and environmental considerations governed by the relevant statutory and policy frameworks applicable to these applications. It is important to emphasise that the onus lies entirely with the applicant to provide adequate evidence demonstrating that all pertinent legal and policy tests have been met. Objectors such as myself bear no obligation to prove otherwise. Upon careful review of the submissions and supporting material, it is clear that the applicant has failed to satisfy these requirements. Consequently, the applications should be refused consent.

1.1.387 Seascape, Landscape and 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.

1.1.388 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 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 deficiencies in the landscape assessment is a corresponding undermining of the credibility of the heritage impact conclusions. As the heritage conclusions rely directly on the findings of the landscape assessment, any understatement of landscape effects necessarily transfers to the heritage analysis. This interdependence means that if landscape effects are not fully or accurately recognised, the subsequent heritage impact conclusions will similarly underestimate the true extent of harm. Therefore, the validity of the heritage conclusions is compromised by the initial shortcomings in the landscape evaluation, calling into question the robustness of the overall impact assessment.

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

1.1.389 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 assessment methodology notably falls short in its treatment of island communities, particularly when compared to the detailed analysis provided for port communities. While the consultants themselves acknowledged habitability as a significant pathway for potential impacts, no subsequent place-based assessment of the affected islands was undertaken. Instead, the socio-economic appraisal in Chapter 18 operates at a regional scale, focusing in detail on potential port communities but neglecting equivalent scrutiny of the island communities directly facing the development. Despite this omission, the assessment nonetheless concludes that these island communities exhibit low sensitivity to tourism effects, a finding unsupported by targeted evidence.

This regional approach inadequately reflects the realities of small island economies, which are distinct from broader regional averages and are concentrated in sectors most vulnerable to changes in visitor appeal. Reliance on increasing visitor numbers does not mitigate this vulnerability; rather, it intensifies dependence on the very qualities potentially threatened by the proposal. Therefore, the conclusion of low sensitivity, drawn without specific place-based analysis, represents an unsubstantiated assumption rather than a robust, evidence-based finding. Such a methodological flaw undermines the ability to fully understand or appropriately mitigate potential socio-economic impacts on island communities.

The 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.

1.1.390 Cumulative and In-Combination Effects

The current planning application before the Scottish Ministers addresses only a portion of the overall development, specifically excluding the export cable corridor and onshore transmission works, which are essential components without which the wind farm cannot function. These elements are deferred to separate, subsequent applications. Consequently, the environmental and planning effects of the entire project are never collectively assessed at a single point in the consenting process. This fragmented approach results in important aspects of the development being considered only after the principal decision has been made.

This manner of project assessment is inconsistent with established legal principles, as underscored in the Raeshaw Farms judgment. The courts have affirmed that a project must be evaluated in its entirety rather than being segmented into smaller parts whose individual impacts may appear less significant. By effectively "salami-slicing" the project, the current approach prevents a comprehensive evaluation of the cumulative effects, undermining the integrity of the decision-making process. Therefore, the assessment methodology applied here is procedurally and legally flawed, rendering the current consent process incomplete and insufficient.

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 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.

1.1.391 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 (EIA) submitted with this application falls short of providing sufficiently robust evidence for the Scottish Ministers to make an informed decision. While the EIA is comprehensive in scope, its adequacy cannot be judged by extent alone but by the reliability and completeness of its findings. In this case, the assessment identifies potential pathways to significant environmental effects but fails to investigate these comprehensively. For example, the landscape assessment relies on a distance-based pattern of impact that is unsupported by its own stated methodology. Similarly, the heritage assessment does not convincingly apply its integrity test, and the socio-economic evaluation lacks any place-based analysis pertinent to the affected island communities. These methodological shortcomings undermine the credibility of the conclusions drawn and do not satisfy the requirement for clarity on likely significant effects prior to determination.

Furthermore, the application's dependence on future assessments, post-consent plans, ongoing monitoring, and additional approvals to address outstanding environmental concerns is insufficient to meet the statutory requirements of the EIA Regulations. The regulations mandate that all likely significant effects be fully understood and assessed before consent is granted. Relying on measures to be implemented after consent does not remove this obligation. The Scottish Ministers

must base their decision on the evidence currently before them, rather than on assumptions that unresolved issues will be adequately addressed later. The applicant has not demonstrated that the environmental information submitted is adequate or complete to support a lawful and informed determination.

1.1.392 Effects on Local Area

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.

There remains significant uncertainty concerning the applicant's assessment of effects on designated landscapes and island communities within the wider seaboard area. Notably, Ulva, situated within the Loch na Keal National Scenic Area, experiences the full extent of the development's impact on that designated landscape. This island is a community-owned entity in the early stages of regeneration, comprising a small, re-establishing population whose recovery critically depends on the very qualities of setting and unspoilt seascape that are at risk. Despite this, no specific assessment has been conducted to evaluate the potential effects on Ulva's natural and cultural environment, leaving an important gap in the appraisal that undermines understanding of the development's true impacts.

Furthermore, the treatment of other designated landscapes appears to underestimate or omit significant effects. For instance, Staffa, also within the Loch na Keal National Scenic Area and renowned across Europe, lies around 35 kilometres from the development site—beyond the approximately 30 kilometres that NatureScot advised should be considered when assessing National Scenic Area qualities. Although the applicant's assessment acknowledges Staffa's panoramic maritime qualities, it concludes that the scale of change would be small and the effects not significant, a position that appears insufficiently cautious given the island's importance. Similarly, the Jura National Scenic Area, assessed as having High sensitivity at distances of approximately 28 to 32 kilometres, is attributed only Medium to Low magnitude effects, with this moderation justified by distance and retained landforms despite the area's designation based on its wild, undeveloped Atlantic character. The Scarba, Lunga, and the Garvellachs National Scenic Area, located 35 to 40 kilometres away, receives a comparable level of assessment. Taken together, these considerations suggest that the applicant's evaluation does not adequately capture the potential for significant adverse impacts on these valuable landscapes and vulnerable island communities. In light of these concerns, the protection of their natural and cultural qualities cannot be assured.

1.1.393 Personal Observations

In addition to the planning matters above, I am personally concerned because: This proposal would catastophcally alter the area and each of the small communities within it. In particular I am concerned about the negative impact on Iona, the ancient cradle of Christianity in Scotland, a place of incalculable spiritual value to people worldwide. I have been to Iona and plan to return, but dismayed that this proposal will ruin the unique beauty and peace of the place.

Based on my own local knowledge, I also wish to highlight that: Iona Abbey is one of the oldest Christian religious centres in Europe and is a living and working Christian community with a worldwide membership, influence and impact.

1.1.394 Summary

The proposal before the Scottish Ministers fails to demonstrate compliance with the relevant statutory and policy frameworks governing its determination. The applicant's own assessment acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along the coast. However, published critiques of the applicant's documentation indicate that the extent of these impacts has been understated. Crucially, the heritage assessment required by policy has not been completed. Furthermore, although adverse effects on the island communities affected by the development were identified, no formal evaluation of these impacts has been undertaken. The ecological requirements set out by statutory tests remain unproven as capable of being satisfied. Additionally, it is important to note that only a portion of the proposed project is currently before the Scottish Ministers for consideration.

In light of these substantial deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm, as well as to refuse the accompanying marine licence. Should the Ministers be inclined not to refuse outright,

I request that they require the submission of further environmental information accompanied by enhanced visualisations. Moreover, I contend that the applications ought to be determined only following a public inquiry, allowing for comprehensive examination of the issues raised in this objection. Whatever the outcome, I also ask that the Ministers explicitly address and provide clear conclusions within their decision regarding the effects on cultural heritage and the impacted island communities.

Yours faithfully,

[Redacted]

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

Member of the public 644
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.

1.1.395 Legislative and Policy Framework

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

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

Given these deficiencies and the lack of demonstrated compliance with the statutory duties under Schedule 9, the application conflicts with the applicable legal and policy framework. As established, where such conflicts or omissions exist, they weigh decisively against the granting of consent. Therefore, the application should be

refused on the basis that it does not meet the mandatory statutory requirements of the Electricity Act 1989.

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

The evidence confirms that where compliance with these policies has not been demonstrated, or where deficiencies, omissions, or conflicts with the applicable legal and policy framework exist, such matters weigh decisively against the granting of consent. In this case, the proposal's failure to address these critical policy requirements undermines the statutory and policy framework intended to protect biodiversity, natural environments, historic assets, and energy considerations.

Accordingly, the application should be refused on the basis that it does not meet the mandatory standards set out in NPF4, and the identified policy breaches constitute a clear and material planning objection.

The proposal fails to provide the comprehensive environmental impact assessment required under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which mandate that likely significant environmental effects must be identified, assessed, and reported prior to any determination. This omission undermines the statutory process designed to ensure informed decision-making and environmental protection.

Furthermore, the application does not demonstrate compliance with the Habitats Regulations, which require a thorough assessment of the proposal's effects on European protected sites in accordance with the applicable statutory tests. The absence of such an assessment constitutes a clear failure to meet legal obligations intended to safeguard protected habitats and species.

Given these deficiencies and the failure to demonstrate compliance with both the environmental impact assessment and habitats regulations, the proposal conflicts with the applicable legal and policy framework. As established, where such compliance is not shown, these matters weigh decisively against the granting of consent. Therefore, the application should be refused on these grounds.

The 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 how the interests of island communities have been addressed, resulting in a conflict with the applicable legal and policy framework. Such failures weigh decisively against the granting of consent for the proposal.

The practical consequence of the applicant's failure to discharge the evidential burden of proof is that the planning application cannot lawfully be granted consent. It is a fundamental principle that the applicant must demonstrate, by means of robust, objective, and proportionate evidence, that every relevant statutory duty, planning policy, and environmental assessment requirement has been fully satisfied. This responsibility is not discretionary but mandatory, ensuring that decision-makers can properly assess compliance with the comprehensive legal and policy framework governing the proposal.

In this case, the applicant has not fulfilled this essential evidential obligation. The submitted documentation lacks the necessary rigor and completeness to confirm that all applicable statutory duties and planning policies have been met. There are clear deficiencies and omissions within the evidence presented, which undermine confidence in the applicant's compliance claims. Moreover, where the evidence does exist, it reveals conflicts with the relevant legal and policy requirements, further demonstrating non-compliance.

Given these shortcomings, the application fails to meet the threshold of proof required to establish lawful conformity with the planning and environmental regime. The absence of satisfactory evidence to demonstrate compliance means that the statutory and policy framework has not been properly engaged or satisfied. Consequently, these unresolved evidential gaps and conflicts must weigh decisively against the granting of planning consent.

In conclusion, the applicant has not discharged the burden of proof to demonstrate compliance with all relevant legal and policy requirements. The deficiencies, omissions, and conflicts identified in the evidence are material and substantive, rendering the application incapable of lawful approval. Therefore, the application should be refused on the basis that the applicant has failed to meet the fundamental responsibility to provide robust and objective evidence of compliance.

1.1.396 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to comply with several key policies within the National Planning Framework 4 that protect nationally important landscapes, heritage assets, and biodiversity. Specifically, it conflicts with Policy 11, which operates alongside Policy 4(c) and 4(d) aimed at safeguarding National Scenic Areas and other nationally important landscapes from significant adverse effects on the qualities for which they are designated. Additionally, the proposal does not accord with Policy 7, including Policy 7(h) relating to scheduled monuments and Policies 7(c) and 7(d) concerning the setting of historic assets, nor does it meet the requirements of Policy 3 on biodiversity.

The reasons for this conflict are set out in detail in the subsequent sections. The proposal would result in significant adverse effects on nationally designated landscapes and seascapes, while it has not been demonstrated that the cultural significance of scheduled monuments and their settings would be adequately protected. Furthermore, there is no sufficient evidence to show that island communities would be safeguarded or that the necessary ecological tests can be met. Taken together, these shortcomings indicate the proposal is not in compliance with the relevant NPF4 policies designed to protect designated assets.

The applicant’s evidence acknowledges that, insofar as terrestrial development plans are relevant to the land-based effects of the proposal, the same conflicts identified with the Argyll and Bute Local Development Plan 2 arise. Specifically, the proposal would have adverse impacts on the landscape, heritage, and community interests that these policies are designed to protect. This recognition confirms that the proposal does not align with the objectives set out within the local development plan framework.

Furthermore, the applicant has not demonstrated that the proposal is consistent with the development plan or with the National Planning Framework 4 when considered in its entirety. The admitted conflicts with key policy aims underscore the fundamental inconsistency of the proposal with the established planning framework. On this basis, the proposal should be regarded as contrary to the relevant terrestrial development plan policies.

1.1.397 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 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 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.

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.

1.1.398 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 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 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 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.

1.1.399 Effects on Island Communities, Tourism and the Local Economy

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

Any alteration to these defining qualities would directly undermine the economic foundation of these island communities. Such economic disruption would extend

beyond immediate financial impacts, threatening the provision of essential services, the stability of local populations, and ultimately the long-term viability of these communities. Consequently, the proposal poses a significant risk to the sustainability of the islands in both social and economic terms.

The applicant's own consultants have acknowledged that habitability constitutes a potentially significant pathway through which the proposal could impact island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 addresses potential impacts at a regional scale, focusing in detail on port communities but omitting a comparable place-based evaluation of the island communities directly facing the development. Nevertheless, the assessment asserts that these island communities exhibit low sensitivity to tourism effects.

This approach is fundamentally flawed, as small island economies differ markedly from regional averages. Their economic structures are concentrated in sectors most vulnerable to alterations in the qualities attracting visitors, and their reliance on increasing visitor numbers amplifies, rather than diminishes, their sensitivity to such changes. Therefore, the conclusion of low sensitivity for these island communities, reached without any place-specific analysis, lacks evidential basis and amounts to an unfounded assumption rather than a substantiated finding.

The proposal 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.

1.1.400 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.

In considering the applicant's approach to addressing potential adverse effects on protected sites, it is notable that they have submitted both a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan. These documents specifically target the guillemot population within the North Colonsay and Western Cliffs Special Protection Area, reflecting a recognition that the proposed development may pose risks to this designated habitat. Such submissions are conventionally prepared in circumstances where it cannot be definitively ruled out that the integrity of a protected site may be compromised, indicating a precautionary stance on the part of the applicant.

The presence of these documents within the application package serves as a significant feature, underscoring the applicant's awareness of the complexities involved in securing consent where protected species and sites are concerned. Importantly, these plans are framed as "Without Prejudice," suggesting that the applicant does not concede an adverse effect but acknowledges the possibility that the Scottish Ministers might assess the situation differently. This cautious approach allows for the consideration of derogation provisions under relevant conservation legislation, which permit certain actions that might otherwise be prohibited, provided that appropriate compensation measures are implemented to offset any harm.

While the submission of derogation and compensation plans demonstrates a proactive attempt to mitigate potential impacts, it also raises questions about the certainty of the applicant's conclusions regarding adverse effects. The reliance on such documents reflects an understanding that the planning authority may not concur with the applicant's assessment of no significant harm. Consequently, these submissions should be carefully scrutinised to ensure that any proposed compensation is adequate, enforceable, and capable of maintaining the overall integrity of the protected area. It remains essential that the planning decision fully weighs these considerations in determining whether the application can be granted without undermining the conservation objectives of the site.

The applicant's evidence confirms that, under the Habitats Regulations, planning consent may only be granted if the competent authority is satisfied that the proposed development will not adversely affect the integrity of the protected site, except where the stringent derogation tests are fully met. This legal framework demands that no reasonable scientific doubt remains regarding the absence of adverse effects. Importantly, the responsibility to demonstrate this compliance lies squarely with the applicant. Furthermore, proposals relying solely on mitigation, compensation measures, or future monitoring cannot, in isolation, satisfy the statutory

requirements. This rigorous evidential standard is reinforced by relevant policy provisions, including GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. Taken together, these legal and policy mandates set a high threshold for consent, ensuring that developments affecting protected habitats and species are subject to thorough scientific scrutiny before approval is granted.

The applicant has not demonstrated that the statutory tests designed to protect internationally important habitats and species can be satisfied. This conclusion arises directly from the evidence submitted, including the applicant’s own derogation documents, which collectively reveal an absence of the requisite certainty regarding compliance with these legal requirements. Without clear and convincing evidence that these statutory tests are met, the application fails to fulfil the legal obligations necessary to safeguard internationally significant ecological features. Consequently, this undermines the justification for granting consent, as the statutory protections remain unaddressed and the potential for adverse impacts on protected habitats and species cannot be adequately ruled out.

1.1.401 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 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 assessment identifies a clear failure to comply with established policy and regulatory requirements concerning project splitting and the evaluation of cumulative effects. Specifically, the applicant has not satisfactorily demonstrated that the cumulative and in-combination impacts of the proposal, nor the effects of the project

in its entirety, have been reliably identified and assessed. This shortfall engages provisions 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 and the Environmental Impact Assessment Regulations.

This omission is significant because it undermines the integrity of the environmental assessment process and the policy framework designed to ensure comprehensive consideration of all relevant effects. Without a clear and thorough appraisal of deferred works and their potential interactions with the proposed development, the decision-making process is compromised. The absence of explicit treatment of these elements means that the proposal cannot be considered fully compliant with the requirements intended to prevent project splitting and to address cumulative effects adequately.

In light of these findings, it is essential that the determination explicitly addresses the treatment of deferred works and ensures a rigorous assessment of the project as a whole. Only through such comprehensive consideration can the planning authority fulfil its statutory obligations and uphold the principles of sustainable development enshrined in national policy and legislation. Consequently, the application should not be approved until these deficiencies are satisfactorily remedied.

1.1.402 Public Engagement, Site Selection and Environmental Information

There is considerable uncertainty regarding the adequacy of public participation in the site-selection process, which raises important questions about the legitimacy of the decisions made. The applicant invites Scottish Ministers to place significant weight on this process; however, the quality of participation at both the plan and site-selection stages has been deficient and these shortcomings have persisted into the current application phase. The application itself comprises many thousands of pages of technical material, yet the consultation period coincided with the busiest months for island communities, when residents are engaged continuously throughout the visitor season and access to specialist advice is limited. In contrast, the applicant has had years to prepare and considerable professional and financial resources at its disposal. Furthermore, National Marine Plan policy GEN 18, alongside the principles of effective public participation enshrined in the Aarhus Convention, stipulates that those affected must have a realistic opportunity to engage in decisions of such magnitude. The conditions imposed on affected communities here fall short of this standard, a factor which Ministers should carefully consider when weighing the representations submitted.

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.

1.1.403 Effects on Local Area

The applicant's assessment acknowledges that Islay and Colonsay are the closest islands to the proposed development area, which lies immediately north-west of Islay and west of Colonsay. However, the appraisal principally considers Islay only as a potential direct project location, rather than recognising it as an affected island community in its own right. This approach overlooks the Atlantic-facing communities on Islay, which are situated adjacent to the nearest edge of a 448 square kilometre development area, without any place-based evaluation of the impacts on their local setting, economy, or community life. Such an omission undermines the reliability of the environmental and heritage impact assessment by failing to properly account for the direct and significant effects on the island's population and socio-economic fabric.

Similarly, for Colonsay and Oronsay, the assessment does not adequately address the implications of the development on their seaward outlook, which is fundamental to daily life there. The North Colonsay and Western Cliffs Special Protection Area, located on Colonsay's coastline, is central to the applicant's derogation case and compensation plan. This area represents the clearest concession within the application that harm to the internationally protected seabird population of these cliffs cannot be ruled out, further emphasising the potential adverse effects on local biodiversity that are insufficiently explored.

Moreover, Oronsay Priory, a scheduled monument of national importance situated within this community, is subject to the same deficiencies identified in the heritage assessment. In particular, the treatment of its open maritime setting is inadequately considered, thereby compromising the thoroughness and accuracy of the heritage impact evaluation.

Taken together, these factors demonstrate that the applicant's assessment underestimates the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. This underassessment calls into question the overall reliability of the environmental and heritage impact evaluation presented within the application.

The applicant's assessment significantly underestimates the scale and importance of visual, community, and heritage impacts on Iona, thereby compromising the overall accuracy of the environmental and social impact evaluation. The Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity, directly facing the development site, with extensive visibility and a large geographical extent of change spanning approximately 21 kilometres. The proposed turbines would extend across around 39 degrees of the horizon, affecting key views including the ferry crossing between Fionnphort and Iona. Similarly, the West Coast of Iona is acknowledged as highly sensitive with widespread visibility, where the applicant concedes significant effects for residents and visitors, including those at Dùn Ì, the

island’s highest point. Importantly, Iona’s monastic landscape—comprising the Abbey, the Nunnery, and the high crosses—holds international heritage significance, closely tied to pilgrimage and maritime arrival. Despite Historic Environment Scotland’s request for additional viewpoints, including from the ferry crossing itself, no visualisation is provided from the elevated ground above St Columba’s Bay at Càrn Cùl ri Èirinn, leaving a critical gap in the assessment. Community concerns further underscore the impact; a household consultation revealed that 92 per cent of respondents on Iona object to the proposal, yet the applicant’s own consultants identified habitability as a potential effect pathway that remains unassessed. To contextualise the scale, the largest proposed turbines would exceed the height of Ben Hynish on Tiree by approximately 194 metres, appearing substantially larger despite being at roughly two-thirds of the distance from Iona. These factors collectively demonstrate that the applicant’s evaluation does not fully capture the significant and wide-ranging effects on Iona, undermining the robustness of the environmental and social impact conclusions.

The applicant’s assessment 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 appears to underestimate or omit significant effects on several important designated landscapes and vulnerable island communities, thereby undermining the protection of their natural and cultural qualities. While some mitigation measures are proposed, a detailed comparison reveals shortcomings in addressing the specific sensitivities and contexts of these areas. Ulva, for example,

lies within the Loch na Keal National Scenic Area and is a community-owned island at the beginning of its regeneration. This small, re-establishing community relies heavily on the unspoilt seascape and setting, yet no assessment has been made of the effects on Ulva, despite it sharing in full the impacts on the wider National Scenic Area. This omission is particularly concerning given the community's dependence on the qualities at stake. Similarly, Staffa, also within the Loch na Keal National Scenic Area and renowned as one of the most celebrated small islands in Europe, lies approximately 35 kilometres from the development area. This distance exceeds the approximate 30 kilometres to which NatureScot advised that effects on National Scenic Area qualities be assessed. Despite recognising the panoramic maritime qualities of Staffa, the applicant concludes that the scale of change would be small and the effect not significant, a position that appears insufficiently precautionary given the island's international importance. The Jura National Scenic Area, assessed as having high sensitivity at a distance of approximately 28 to 32 kilometres, is attributed only medium to low magnitude effects, with this moderation explained by distance, apparent scale, and retained landforms. However, this assessment seems to overlook the fundamental basis of Jura's designation, which rests on the wild, undeveloped character of its Atlantic outlook—precisely the quality potentially compromised by the development. A similar approach is taken to the Scarba, Lunga and the Garvellachs National Scenic Area, situated approximately 35 to 40 kilometres away, which also receives a comparable assessment. Taken together, these assessments suggest a pattern of underestimation or insufficient consideration of significant effects on designated landscapes and island communities, particularly where their defining qualities are dependent on unspoilt seascapes and remoteness. In conclusion, the applicant's approach does not fully acknowledge or mitigate the likely impacts on these sensitive areas, thereby risking harm to their natural and cultural attributes that warrant stronger protection.

The applicant's assessment concludes a Low magnitude of change for the South Tiree coastal area despite recognising its High sensitivity at a distance of approximately 35 kilometres. This practical consequence is significant, as it directly informs the reliability of the overall evaluation of effects on Tiree's landscape. By attributing a Low magnitude of change, the assessment risks underrepresenting the actual scale of impact experienced by receptors on Tiree, which in turn undermines the credibility of any subsequent mitigation measures or planning decisions based on this evaluation.

Tiree's distinctive landscape character is fundamentally shaped by its exceptional low-lying topography and the dominance of sea and sky, with its highest elevation at Ben Hynish measuring a mere 141 metres. In this context, the introduction of turbines reaching up to 335 metres would present vertical elements unprecedented in the island's seascape. Given this stark contrast, the conclusion of a Low magnitude of change appears incongruous and insufficiently reflective of the visual and experiential effects on such a sensitive receptor. This suggests a severe understatement of impact that warrants reconsideration to ensure that the assessment accurately captures the scale and nature of landscape effects on Tiree.

While the applicant's assessment attempts to moderate effects based on distance, this approach inadequately addresses the significant impacts experienced by mainland and island communities with direct visual and economic connections to the

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

There remains 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.

1.1.404 Personal Observations

In addition to the planning matters above, I am personally concerned because: These turbines would negatively affect the tranquility of these area which will in turn impact the lives of the citizens and the impact on tourism.

Based on my own local knowledge, I also wish to highlight that: It will affect the wildlife as well as the unique landscape of the Inner Hebrides.

Finally, I would also ask the Scottish Ministers to consider: I have found the Inner Hebrides to be an area of great natural beauty and a place of peace. It would impact both the residents and the people who travel to Scotland to experience the beauty of the area.

1.1.405 Further Comments

Natural beauty is being lost every day. There must be an alternate solution to this problem.

1.1.406 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 645
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.

1.1.407 Legislative and Policy Framework

The marine licence application under Part 4 of the Marine (Scotland) Act 2010 fails to demonstrate compliance with multiple General Policies of Scotland's National Marine Plan, 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 framework, and the application's deficiencies in addressing them represent significant non-compliance with the statutory requirements.

Given that authorisation decisions must be taken in accordance with the National Marine Plan unless relevant considerations indicate otherwise, the failure to demonstrate compliance or to provide adequate evidence addressing these policies constitutes a material conflict with the applicable legal and policy framework. Such deficiencies and omissions weigh decisively against the granting of consent for this marine licence application.

The applicant's submission fails to comply with the requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which mandate that the likely significant environmental effects of the proposal must be identified, assessed, and reported prior to any determination. Furthermore, the proposal does not satisfy the

obligations under the Habitats Regulations, which require a thorough assessment of the effects on European protected sites in accordance with the applicable statutory tests.

The evidence before the determining authority does not demonstrate compliance with these statutory requirements. There are clear deficiencies and omissions in the environmental impact assessment and habitats regulations assessment submitted. These shortcomings represent a failure to meet the legal standards established to protect the environment and European designated sites. As such, the proposal conflicts with the applicable legal and policy framework governing environmental and habitats protection.

Given the absence of adequate and compliant assessments, the proposal cannot be considered to have fulfilled the necessary statutory tests. This failure weighs decisively against the granting of consent. The application should therefore be refused on the grounds of non-compliance with mandatory environmental impact assessment and habitats regulations requirements.

The 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.

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

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

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

1.1.408 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 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's evidence clearly indicates that the proposal conflicts with the terrestrial development plan framework relevant to land-based effects, including the Argyll and Bute Local Development Plan 2. Specifically, the proposal would have adverse impacts on the landscape, heritage, and community interests that the policies within this plan are designed to protect. These conflicts are directly attributable to the nature and location of the development, which the plan seeks to safeguard through its provisions.

Furthermore, the proposal is not only at odds with the local development plan but also with the National Planning Framework 4 when considered in its entirety. The applicant has not provided sufficient justification or evidence to demonstrate that these conflicts can be reconciled or mitigated. Consequently, the proposal remains inconsistent with the established development plan framework, underscoring its unsuitability in the current form.

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

The 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.

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

The application fails to provide adequate mitigation measures to ensure the protection of internationally and nationally important heritage assets, as required under the relevant planning policies. Notably, it does not comply with the provisions of NPF4 Policy 7, specifically subparagraphs (h) relating to scheduled monuments and (c) and (d) concerning their settings, alongside GEN 6 and the guidance contained within paragraphs 4.22 to 4.23 of the National Marine Plan. These policies collectively establish a clear framework for safeguarding cultural heritage, requiring a thorough assessment and demonstration that the significance of such assets and their settings will be preserved.

Moreover, the applicant has not furnished the necessary evidence to confirm that the cultural significance of the heritage assets will be maintained. The Scottish Ministers, therefore, lack the comprehensive assessment required to form a conclusion on this matter. In the absence of such a critical evaluation, the proposal cannot be deemed compliant with the statutory policy framework intended to protect heritage assets. Consequently, the application as it stands undermines the acceptability of the development from a heritage protection standpoint.

1.1.411 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 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.

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.

1.1.412 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 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.

In practice, this means that any development proposal affecting protected habitats or species must meet an exceptionally high evidential threshold before consent can be granted. The competent authority is legally required to ensure that the proposal will not adversely affect the integrity of the protected site, and this must be established beyond reasonable scientific doubt. It is not sufficient for applicants simply to propose mitigation, compensation, or future monitoring measures; these alone do not satisfy the statutory tests under the Habitats Regulations.

This legal framework is reinforced by relevant planning policies, including GEN 9 and GEN 13 of the National Marine Plan as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. Together, these regulations and policies establish a stringent consent regime that places the burden of proof firmly on the applicant to demonstrate compliance. Consequently, decision-makers must be satisfied on robust scientific grounds before any approval is considered.

The 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.

1.1.413 Cumulative and In-Combination Effects

There is considerable uncertainty surrounding the current approach to assessing the proposed project, as only a portion of it is presently before the Scottish Ministers. Crucially, the export cable corridor and the onshore transmission works—integral components without which the wind farm cannot function—have been deferred to separate, later applications. This fragmentation means that the full scope of the project's impacts is not being evaluated in a single, comprehensive process.

The consequence of this piecemeal approach is that significant elements of the development will be subject to subsequent consenting processes that occur after the principal decision on the wind farm itself has been made. Such a method prevents the decision-makers from having a complete understanding of the cumulative effects of the entire proposal at the time they grant consent. This is particularly problematic because it obscures the true scale and nature of the project's environmental and operational impacts.

This approach is inconsistent with established legal principles, as affirmed in the Raeshaw Farms case, which emphasises that a project must be assessed as a whole rather than being artificially divided into smaller parts whose individual effects may seem less significant. To ensure a lawful and thorough evaluation, the entire development, including all essential infrastructure, must be considered together. Without this comprehensive assessment, the current process is fundamentally flawed and risks overlooking critical issues.

The 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 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.

1.1.414 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 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.

1.1.415 Effects on Local Area

The applicant’s environmental and heritage impact assessment fails to adequately address the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. This underassessment has practical consequences, as it undermines the reliability of the evaluation upon which planning decisions must be based. Despite Islay and Colonsay being the closest inhabited islands to the development area—which lies immediately north-west of Islay and west of Colonsay—the application primarily considers Islay only as a potential project location. It neglects to assess Islay as an affected island community in its own right. Notably, Islay’s Atlantic-facing communities are situated nearest to the edge of a 448 square kilometre development area, yet no place-based assessment has been undertaken to evaluate how the development might affect their setting, local economy, or community life.

The omission is equally apparent with respect to Colonsay and Oronsay, where the seaward outlook forms a defining feature of daily life and faces the proposed development directly. The North Colonsay and Western Cliffs Special Protection Area, which forms part of Colonsay's own coastline, is central to the applicant's derogation case and compensation plan. This area represents the clearest acknowledgment within the application that harm to the internationally protected seabird population inhabiting these cliffs cannot be ruled out. Such acknowledgement further highlights the need for a thorough, place-specific assessment of the potential impacts on Colonsay's natural environment, which the current submission does not provide.

Moreover, Oronsay Priory, a scheduled monument of national importance, lies within this community's area and benefits from statutory protection. The heritage assessment's identified gaps apply fully to the evaluation of the monument's open maritime setting, which remains insufficiently considered. The failure to robustly assess the effects on this nationally significant heritage asset, alongside the broader community and environmental concerns for Islay, Colonsay, and Oronsay, calls into question the completeness and credibility of the overall impact evaluation presented by the applicant. Without rectifying these deficiencies, the application cannot be regarded as adequately addressing the interests of these island communities or the protection of their valued heritage and environment.

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

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

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

The applicant's assessment fails to 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 the South Tiree coastal area a High sensitivity rating at an approximate distance of 35 kilometres, yet concludes a Low magnitude of change from the proposed development. This juxtaposition of high sensitivity with minimal change appears inconsistent when considering the specific characteristics of Tiree's landscape.

Tiree is an exceptionally low-lying island, with its highest elevation at Ben Hynish reaching only 141 metres. Its landscape character is fundamentally shaped by the dominance of the sea and sky, offering an open oceanic horizon that is currently free from vertical structures of significant scale. The introduction of turbines reaching up to 335 metres would represent unprecedented vertical intrusions within this seascape. Consequently, the applicant's Low magnitude conclusion underrepresents the true extent of visual and character impacts on this highly sensitive receptor, rendering the overall evaluation unreliable.

The applicant's assessment fails to address significant effects on mainland and island communities that have direct views of, and economic reliance upon, the seascape affected by the development, thereby undermining the comprehensiveness of the evaluation. Notably, Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by residents, faces the development waters from the east; yet, no examination has been made of the potential impacts on its delicate community balance and economy. Similarly, Ardnamurchan Point—the most westerly point of the British mainland—offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas represent precisely the receptors for which the applicant's distance-based moderation has been applied in this objection, calling into question the adequacy of the assessment. Additionally, the west coast of Kintyre comprises a sequence of communities whose character, outlook, and visitor economy are defined by their exposure to the open Atlantic seaboard towards Islay, Jura, and adjacent waters. The Treshnish Isles and other small islands and mainland coasts with views toward the development area share this position and have similarly been omitted from consideration. In light of these unassessed effects on key coastal and island communities, the applicant's assessment cannot be regarded as comprehensive or sufficiently robust.

The applicant's environmental impact assessment systematically moderates and discounts the significance of effects on highly sensitive receptors located beyond approximately 20 kilometres. This approach results in a consistent underestimation of impacts, as evidenced by the treatment of these distant communities. Instead of conducting thorough, place-based assessments that accurately reflect the experiences of those affected, the assessment applies a broad-brush reduction in magnitude of change and effect significance once the 20-kilometre threshold is exceeded. Consequently, the assessment fails to capture the true extent and nature of environmental effects on these sensitive receptors. In conclusion, this distance-based methodology fundamentally undermines the integrity and reliability of the

environmental impact assessment, as it neglects to properly evaluate and represent the impacts experienced by communities beyond this arbitrary boundary.

1.1.416 Personal Observations

In addition to the planning matters above, I am personally concerned because: Our family have a deep, spiritual connection to these isles, in particular Mull and Iona, and regularly spend significant time and resources to visit and support religious communities located thereon. The spiritual, historical, and natural integrity of this incredibly special part of the world will be degraded by this project. Our willingness to travel to and directly support these local economies will, likewise, be vastly diminished.

Based on my own local knowledge, I also wish to highlight that: There are. In particular, the prayerful religious communities located on the isle of Iona. Also of great concern is the negative effects on local and migratory wildlife this proposed project will have if it goes forward.

1.1.417 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 646
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.

1.1.418 Conflict with National Planning Framework 4 and the Development Plan

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.

1.1.419 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 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 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 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.

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

Historic Environment Scotland's consultation responses, as recorded within the application documentation, highlight concerns that the applicant's assessment may not adequately capture these broader qualities. They specifically requested the inclusion of additional viewpoints to ensure a fuller representation of the cultural landscape's experiential aspects. This indicates a potential shortfall in the baseline assessment and suggests that the heritage impact appraisal may underestimate effects on the wider cultural and experiential context. Consequently, the assessment should be revisited to incorporate these broader perspectives, thereby providing a more comprehensive understanding of heritage impacts.

The heritage impact conclusions presented in the 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.

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.

1.1.421 Effects on Island Communities, Tourism and the Local Economy

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

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

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

The applicant's own consultants have acknowledged that habitability constitutes a potentially significant pathway through which the proposal could impact island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 addresses potential impacts at a regional scale, focusing in detail on port communities but omitting a comparable place-based evaluation of the island communities directly facing the development. Nevertheless, the assessment asserts that these island communities exhibit low sensitivity to tourism effects.

This approach is fundamentally flawed, as small island economies differ markedly from regional averages. Their economic structures are concentrated in sectors most vulnerable to alterations in the qualities attracting visitors, and their reliance on increasing visitor numbers amplifies, rather than diminishes, their sensitivity to such changes. Therefore, the conclusion of low sensitivity for these island communities, reached without any place-specific analysis, lacks evidential basis and amounts to an unfounded assumption rather than a substantiated finding.

1.1.422 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 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.

1.1.423 Cumulative and In-Combination Effects

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.

1.1.424 Public Engagement, Site Selection and Environmental Information

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.

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

Similarly, the Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is described as having high sensitivity within a range of approximately 28 to 32 kilometres from the development, yet the applicant attributes only a medium to low magnitude of effect. This moderation is explained by distance, apparent scale, and retained landforms; however, such an approach risks undervaluing the fundamental qualities that underpin Jura's designation. The same rationale is applied to the Scarba, Lunga and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres from the site, where the applicant's assessment likewise limits the magnitude of effect without thoroughly addressing the cumulative impacts on these sensitive seascapes.

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

The applicant's assessment significantly understates the magnitude of change and impact on the sensitive and distinctive landscape character of Tiree, resulting in an unreliable evaluation of effects. Specifically, the South Tiree coastal area, located approximately 35 kilometres from the development, has been attributed a Low magnitude of change despite being assessed as having High sensitivity. This is a critical inconsistency because Tiree is an exceptionally low-lying island whose entire landscape character is defined by the dominance of sea and sky. The island's highest point, Ben Hynish, rises only 141 metres, which underscores the scale of vertical elements introduced by turbines reaching up to 335 metres in height. Such turbines would represent unprecedented vertical structures in Tiree's open oceanic horizon and seascape, fundamentally altering the island's distinctive character. Given this context, the conclusion that the magnitude of change is Low exemplifies a severe understatement of effects. Therefore, the applicant's evaluation cannot be regarded as reliable, and a reassessment that properly acknowledges the pronounced landscape impact on Tiree is necessary.

The applicant's assessment fails to consider the significant effects on 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.

1.1.426 Personal Observations

In addition to the planning matters above, I am personally concerned because: this is awful for the local community & their neighbours, something like this should not be built

Based on my own local knowledge, I also wish to highlight that: yes all of them should receive greater consideration

Finally, I would also ask the Scottish Ministers to consider: the environmental impact fhis would have & destroying natural beautiful scenery & resources

1.1.427 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 647
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.

1.1.428 Legislative and Policy Framework

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

The evidence confirms that the application does not adequately address these requirements. There is a lack of clear demonstration that the applicant has properly considered the preservation of natural beauty or the conservation of important ecological and geological features. Additionally, the proposal fails to show that reasonable mitigation measures have been identified or committed to in order to prevent or reduce harm to these protected interests. This omission constitutes a significant deficiency in the application’s compliance with the legal framework.

Given these shortcomings, the application conflicts with the statutory duties under Schedule 9 of the Electricity Act 1989. Where such compliance has not been demonstrated, and where deficiencies and omissions are evident, these matters

weigh decisively against the granting of consent. Therefore, on the basis of the failure to meet the statutory requirements, the application should be refused.

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 applicant's submission acknowledges that National Planning Framework 4 (NPF4) is a significant material consideration and that Policies 3 (Biodiversity), 4 (Natural Places), 7 (Historic Assets and Places), and 11 (Energy) are engaged by this proposal. However, the evidence before the determining authority fails to demonstrate compliance with these key policies. There are clear deficiencies and omissions in the applicant's documentation that result in conflicts with the statutory duties and legislative requirements underpinning NPF4.

Specifically, the proposal does not provide sufficient evidence to satisfy Policy 3's requirements for biodiversity protection and enhancement. Similarly, the application lacks adequate assessment or mitigation measures to comply with Policy 4's objectives for safeguarding natural places. The historic environment considerations mandated by Policy 7 are not properly addressed, with no convincing demonstration that the proposal preserves or enhances historic assets and places. Furthermore, the submission falls short of meeting Policy 11's standards relating to energy, failing to show how the development aligns with national energy policies.

Given these unresolved deficiencies and the absence of demonstrated compliance, the proposal conflicts with the applicable legal and policy framework established by NPF4. As stated in the evidence, where compliance has not been demonstrated or where such conflicts exist, these matters weigh decisively against the granting of consent. Therefore, the application should be refused on the basis of its failure to meet the requirements of National Planning Framework 4 and its associated policies.

The 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 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 that these interests have been properly identified, assessed, or integrated into the planning rationale. This omission represents a fundamental procedural deficiency, as the statutory duty to consider island communities is not a discretionary matter but a legal obligation that must be satisfied before consent can be granted.

Furthermore, the absence of any substantive consideration or weighting of island community interests constitutes a direct conflict with the applicable legal and policy framework established by the Islands (Scotland) Act 2018. Where compliance with this statutory requirement has not been demonstrated, the legislation explicitly directs that such failures weigh against the granting of planning consent. Given these clear statutory provisions and the evident shortcomings in the proposal's assessment, the application should be refused on the grounds that it does not meet the mandatory requirements of the Islands (Scotland) Act 2018.

The applicant has failed to discharge the fundamental responsibility to demonstrate compliance with all relevant legal and policy requirements, thereby undermining the basis for the granting of planning consent. It is a well-established principle that the onus lies squarely with the applicant to provide robust, objective, and proportionate evidence confirming that every applicable statutory duty, planning policy, and environmental assessment requirement has been fully satisfied. In this case, the evidence submitted does not meet this evidential burden.

Specifically, the applicant's submissions lack the necessary comprehensive and conclusive demonstration of adherence to the full spectrum of statutory and policy obligations. Where such compliance has not been unequivocally established, or where the evidence reveals deficiencies, omissions, or conflicts with the relevant legal and policy framework, these shortcomings must be given significant weight against the proposal. The absence of clear and convincing evidence confirming compliance means that the application cannot be considered to have fulfilled the mandatory requirements imposed by law and policy.

Consequently, the failure of the applicant to provide adequate evidence of compliance constitutes a substantive procedural and substantive defect. This deficiency alone justifies the refusal of planning permission, as the statutory and policy frameworks demand certainty and transparency which have not been demonstrated. In summary, the application should be refused on the grounds that

the applicant has not met the essential evidential burden to prove compliance with all relevant legal and policy requirements.

1.1.429 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 proposal would result in significant adverse effects on nationally designated landscapes and seascapes, thereby conflicting with multiple National Planning Framework 4 (NPF4) policies designed to safeguard these important assets. Specifically, Policy 11 must be read alongside Policy 4(c) and 4(d), which collectively protect National Scenic Areas and other nationally important landscapes from substantial harm to the qualities for which they are designated. Furthermore, the proposal fails to demonstrate adequate protection for the cultural significance of scheduled monuments and their settings as required under Policy 7, including Policy 7(h) concerning scheduled monuments and Policies 7(c) and 7(d) relating to their historic settings. In addition, the necessary safeguards for island communities, as contemplated within these policies, have not been evidenced. Crucially, the ecological criteria set out in Policy 3 on biodiversity have not been shown to be met, with insufficient evidence to confirm that the ecological tests can be satisfied. Taken together, these shortcomings establish that the proposal is in conflict with the suite of relevant NPF4 policies protecting designated assets, and as such, it should not be supported.

1.1.430 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.

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

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

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

The introduction of aviation and navigation lighting as part of the proposed development would result in a permanent alteration to the night-time seascape, which is currently unlit. This change would persist for the entirety of the stated 35-year operational period, significantly modifying the visual character of the sea horizon during night hours. Such a transformation would be readily perceptible and may affect the qualities that currently define this coastal environment after dark.

Beyond the immediate practical impact, the decision to consent to the development carries a wider policy implication. Granting permission signals that the seascape is considered appropriate for wind farm use despite the acknowledged harm caused by lighting and its effect on the night-time character. This represents a broader acceptance of change to the seascape's intrinsic qualities, not limited to the operational lifespan but indicative of the long-term characterisation of the area within planning policy considerations.

The 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.

1.1.431 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 assessment of heritage impacts within the application acknowledges that the cultural significance of the affected heritage assets is deeply rooted in experiential qualities that extend beyond static visual impressions. The applicant's baseline records explicitly identify these qualities as encompassing pilgrimage routes, arrival by sea, the dynamic movement through a living cultural landscape, and the interrelationships between monuments, spirituality, and the encompassing landscape and seascape. This indicates that the heritage value is fundamentally connected to the experience of movement rather than solely to fixed viewpoints.

However, despite the applicant's recognition of these broader cultural and experiential attributes, Historic Environment Scotland's consultation responses, as documented within the application, have highlighted that the assessment remains incomplete. Historic Environment Scotland has requested the inclusion of additional

viewpoints to ensure that the full range of these wider cultural qualities is appropriately represented and assessed. This suggests that the current assessment may inadequately capture the intricate and dynamic nature of the cultural landscape that contributes to the significance of the heritage assets.

In conclusion, while the applicant's baseline establishes an important framework for understanding cultural significance beyond physical structures, the failure to fully incorporate the experiential and relational aspects of the heritage assets into the assessment risks undervaluing their true importance. For a robust and comprehensive evaluation, it is essential that the wider cultural landscape and its associated qualities are fully considered, as recommended by Historic Environment Scotland. Without this, the assessment falls short of accurately reflecting the heritage impacts, thereby limiting the effectiveness of any proposed mitigation measures.

1.1.432 Effects on Island Communities, Tourism and the Local Economy

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

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

The proposal fails to demonstrate compliance with 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.

1.1.433 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 submission of a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan demonstrates the applicant's acknowledgement of potential adverse effects on the North Colonsay and Western Cliffs Special Protection Area, specifically concerning the guillemot population. Such documents are typically prepared in circumstances where it cannot be conclusively ruled out that the proposal would harm the integrity of a protected site. Their inclusion in the application therefore signals an acceptance that the development could have significant environmental impacts requiring careful regulatory consideration.

This approach also implies that the applicant anticipates the possibility that Scottish Ministers might arrive at a different assessment regarding the presence or extent of adverse effects. By submitting these documents, the applicant seeks to address and mitigate potential harm under derogation provisions, thereby facilitating a pathway for the proposal's approval despite unresolved ecological concerns. This evidences a pragmatic recognition of the risks involved, while leaving open the final determination of the site's conservation status to the competent authority.

Mitigation, compensation proposals, and future monitoring measures, while important considerations, do not in isolation satisfy the stringent evidential requirements set out under the Habitats Regulations for granting consent to developments affecting protected sites. The competent authority must be satisfied beyond reasonable scientific doubt that the proposal will not adversely affect the integrity of the protected habitat. This high evidential standard places the burden of proof firmly on the applicant, who must demonstrate conclusively that the statutory tests are met prior to consent being lawfully granted. Proposals reliant solely on mitigation or compensation without clear evidence of their effectiveness in preventing harm fail to meet these rigorous legal thresholds.

This legal framework is further reinforced by relevant policies, including GEN 9 and GEN 13 of the National Marine Plan, alongside NPF4 Policies 3, 4(b), 4(e) and 4(f). Together, these policies underscore the imperative to prevent adverse effects on protected species and habitats, embedding the requirements of the Habitats Regulations into national planning policy. Consent decisions must therefore be aligned with these provisions, ensuring that no reasonable scientific doubt remains regarding the absence of adverse effects before development is permitted. This comprehensive approach safeguards environmental integrity while maintaining legal compliance.

The applicant's 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.

1.1.434 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 fundamentally on the findings established in the Environmental Impact Assessment, which serve as its baseline. As set out in the applicant's evidence, this baseline encompasses the landscape, heritage, and socio-economic assessments, each of which has been shown to understate the extent of effects. Consequently, the cumulative assessment inherits these initial underestimations, leading to a distorted foundation from which combined impacts are measured.

Given that the initial assessments adopt a reduced baseline, the subsequent cumulative evaluation inevitably reflects this diminished perspective. This means that when the proposal's effects are aggregated with those of existing, consented, and foreseeable developments, the total impact is presented as less significant than it truly is. The reliance on an understated baseline therefore results in the cumulative effects being correspondingly understated, obscuring the full scope of potential harm.

In light of this evidence, the cumulative impact assessment cannot be regarded as a reliable indicator of the combined consequences of development in the area. Without rectifying the baseline shortcomings, the appraisal will continue to misrepresent the scale of cumulative effects, thereby limiting the ability of decision-makers to fully understand and mitigate adverse outcomes.

There remains significant uncertainty regarding the applicant's compliance with essential planning policies and environmental regulations, specifically concerning project splitting and cumulative effects. The submission fails to demonstrate that the cumulative and in-combination impacts of the proposal, or the effects of the project in its entirety, have been reliably identified and assessed, thereby engaging policy GEN 21 and paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), as well as the requirements set out in the EIA Regulations. It is imperative that the deferred works are explicitly considered within the decision-making process to ensure a comprehensive and lawful evaluation. Without such clarity, the application cannot be regarded as fully compliant with the necessary policy and regulatory frameworks.

1.1.435 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 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.

1.1.436 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.

1.1.437 Personal Observations

In addition to the planning matters above, I am personally concerned because: Our peaceful home in Queen Street Portnahaven in Islay will be impacted by the detrimental development of multiple wind turbines which will ruin the seascape and Red night lights will disrupt the beautiful horizon. Detrimental impact on sea life. The project had no direct benefit to Islay. The jobs created will be too specialised for Islay residents. My family home will no longer have a quite peaceful outlook as the wind turbines will be an eyesore and will be humming at night to the detriment of our peaceful community.

Based on my own local knowledge, I also wish to highlight that: Sea life should be considered further. Huge impact on local sealife by the project and its scale

Finally, I would also ask the Scottish Ministers to consider: The west coast of Islay is a national
area of outstanding beauty which will be ruined by this huge wind farm project which has no direct benefit for Islay or its inhabitants.

1.1.438 Further Comments

Thd outlook from my home in Islay and the beautiful beaches on the west coast of Islay such Claddach and Currie Sands will be severely impacted by this grotesque wind farm project which has no direct benefit to Islay, the impact of the project is disproportionate to the size of the island and a huge price to pay

1.1.439 Summary

The proposal before the Scottish Ministers fails to satisfy the statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities of the coastal area. Furthermore, analyses of the applicant's documentation reveal that the extent of these impacts has been

understated. Crucially, the mandatory heritage assessment has not been completed. While the effects on the island communities affected by the development were identified, no assessment of these impacts has been undertaken. Additionally, the ecological criteria required by relevant legislation have not been demonstrated as achievable. It is also notable that the application submitted represents only a portion of the overall project intended for Scottish Ministers' consideration.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm proposal and to reject the associated marine licence. Should the Ministers consider granting approval, it is requested that they require the submission of further environmental information and enhanced visual representations. Moreover, determination of the applications should only proceed following a public inquiry, enabling a thorough examination of the concerns raised in this objection. Regardless of the decision reached, I ask that the Ministers provide clear and reasoned conclusions regarding the impacts on cultural heritage and the affected island communities within their final statement.

Yours faithfully,

[Redacted]

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

Member of the public 648
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.

1.1.440 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 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, which are integral to the assessment process. These policies include GEN 4 concerning Co-existence, GEN 6 and paragraphs 4.22 to 4.23 addressing the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 and paragraph 4.85 on Cumulative Impacts.

The application fails to demonstrate compliance with these statutory policies. The evidence submitted does not adequately address the requirements of GEN 4 regarding the coexistence of marine activities, nor does it sufficiently consider the protection of the Historic Environment as required by GEN 6 and the associated paragraphs. Similarly, the application lacks the necessary assessment of impacts on Landscape and National Scenic Areas as stipulated by GEN 7. The provisions of GEN 9 concerning Natural Heritage are not met, with deficiencies in the evidence relating to potential environmental harm. Furthermore, the application does not fulfill the engagement standards set out in GEN 18, nor does it provide sound evidence in line with GEN 19 and paragraph 4.81. The cumulative impacts, which must be assessed under GEN 21 and paragraph 4.85, are inadequately addressed, leaving significant uncertainty regarding the combined effects of the proposal.

Given these substantial 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, where compliance has not been demonstrated, these matters weigh decisively against the granting of consent. Therefore, the marine licence application should be refused on the grounds of non-compliance with the statutory policies and legal obligations governing marine developments in Scotland.

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 for this development.

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 acknowledges the statutory requirement under the Islands (Scotland) Act 2018 that the interests of island communities must be considered and given due weight in the decision-making process. However, the evidence before the determining authority fails to demonstrate compliance with this obligation. There is a clear absence of any substantive assessment or documentation showing how the proposal has properly accounted for or balanced the specific interests of island communities as mandated by the Act. This omission constitutes a significant procedural and evidential deficiency. Given that the Islands (Scotland) Act 2018 explicitly requires these interests to be integral to the planning evaluation, the failure to address them undermines the legality and soundness of the application. In accordance with the statutory framework, where such compliance is not demonstrated, or where deficiencies and omissions are evident, these factors must weigh against the granting of consent. Therefore, on the basis of the applicant's failure to properly consider and give due weight to the interests of island communities as required by the Islands (Scotland) Act 2018, the proposal should be refused.

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.

1.1.441 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 NPF4 Policy 11, which governs support for renewable energy development. Although Policy 11 endorses such development, this support is conditional and operates strictly within the framework of its specified impact tests, notably those set out in Policy 11(c) concerning effects on communities, and Policies 11(d) and 11(e) relating to impacts on landscape, seascape, and other receptors. A detailed examination reveals that the proposal fails to satisfy these criteria. It would inflict significant adverse effects upon nationally designated landscapes and seascapes, a matter that weighs heavily against compliance. Furthermore, there is an absence of convincing evidence demonstrating that the cultural significance of scheduled monuments and their settings would be adequately preserved. Equally, the proposal does not convincingly ensure the safeguarding of island communities as required. Lastly, the ecological assessments provided lack the necessary clarity and robustness to confirm that the relevant ecological tests can be met. Taken together, these unresolved issues indicate a clear conflict with the policies encapsulated in NPF4 Policy 11, undermining the proposal's claim to policy support for renewable energy development.

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 practical consequence of the proposal is that it would cause adverse effects on the landscape, heritage, and community interests safeguarded by the terrestrial development plan policies. Specifically, the Argyll and Bute Local Development Plan 2 is directly relevant to land-based impacts, and the proposal conflicts with its protective provisions. This incompatibility undermines the plan’s role in guiding sustainable development within the area.

In addition to the development plan conflict, the proposal fails to align with the overarching objectives of the National Planning Framework 4 when considered in its entirety. Despite this comprehensive policy framework, the applicant has not provided sufficient evidence or justification to demonstrate that the proposal would avoid or mitigate the identified adverse effects. This lack of demonstration reinforces the position that the development is inconsistent with established planning policies.

Given these considerations, the proposal should be regarded as contrary to the relevant terrestrial development plan framework, including the Argyll and Bute Local Development Plan 2, and to national planning policy as set out in the National Planning Framework 4. The absence of adequate mitigation or policy compliance weighs decisively against the proposal’s acceptability.

1.1.442 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 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 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 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.

1.1.443 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment methodology, while adopting Historic Environment Scotland's recognised approach, falls short in demonstrating the required evaluative analysis of setting integrity, thereby undermining the reliability of its conclusions regarding heritage impacts. Although the methodology rightly distinguishes visual change from adverse impact and mandates an evaluation of how changes affect the contribution of setting to cultural significance, the applicant's operational assessment relies heavily on descriptive elements such as visibility, distance, monument prominence, retained views, screening, and skyline occupation. However, it stops short of articulating how these factors collectively inform a judgement on whether the integrity of setting is maintained, as required by the methodology. This shortcoming is clearly identified in a published Methodological Audit, which, using the applicant's own Appendix 14.3, reveals that while heritage attributes are acknowledged, the crucial evaluative step that the methodology demands is absent from all examined examples. Consequently, without this essential analysis, the assessment's conclusions that the integrity of setting is adequately retained cannot be substantiated with confidence.

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

1.1.444 Effects on Island Communities, Tourism and the Local Economy

The proposal poses a direct threat to the fundamental economic and social sustainability of the island communities in question by undermining the very qualities that attract visitors. These communities rely exceptionally heavily on visitors, who are drawn by attributes explicitly identified in the applicant's own baseline assessments: landscape, seascape, cultural heritage, tranquillity, and remoteness. Any alteration to these intrinsic qualities would strike at the core of the islands' economic foundation, which in turn supports essential local services, sustains population levels, and ensures the long-term viability of these communities. Consequently, the proposed development jeopardises the enduring welfare and resilience of the island populations by diminishing the visitor appeal upon which they depend.

The applicant's socio-economic assessment fails to provide an adequate understanding of the impacts on island communities, particularly when compared to the detailed evaluation of port communities. While the assessment recognises habitability as a potentially significant pathway affecting island communities, no subsequent place-based analysis of the islands' habitability was undertaken. Instead, Chapter 18 confines its detailed scrutiny to regional and port community impacts, ultimately concluding that island communities exhibit low sensitivity to tourism-related effects. This inconsistent approach undermines the robustness of the assessment and weakens any mitigation strategies proposed for these vulnerable communities.

Island economies are distinctive and cannot be accurately represented by regional averages. Their economic structure is heavily concentrated in sectors that are directly reliant on the attributes attracting visitors, making them inherently more sensitive to any changes affecting those qualities. Indeed, dependence on increasing visitor numbers intensifies, rather than diminishes, their vulnerability. Therefore, the applicant's conclusion of low sensitivity—arrived at without a proper place-specific analysis—is not supported by evidence but rests on an unfounded assumption. This methodological shortcoming calls into question the validity of the socio-economic

assessment and the adequacy of proposed mitigations for the island communities concerned.

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.

1.1.445 Ecology, Biodiversity and Habitats Regulations

While mitigation measures may be proposed to address environmental impacts, it is important to recognise that Priority Marine Features and Annex I habitats are present within the development area itself, with surrounding waters supporting seabirds, marine mammals, and basking sharks. Introducing construction, operational, and decommissioning activities at a very large scale over several decades would inevitably pose significant risks to these sensitive ecological receptors. Given the intrinsic ecological importance of the site and its vulnerability, the potential for significant adverse environmental effects from the proposed development cannot be adequately discounted.

The applicant's submission of a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan signifies an acknowledgment of potential adverse effects on the North Colonsay and Western Cliffs Special Protection Area, specifically concerning the guillemot population. Such documents are typically prepared when it is not possible to exclude an adverse effect on the integrity of a protected site, and their inclusion in the application underscores the applicant's recognition of this risk. Notably, the reliance on these derogation and compensation plans indicates that the applicant accepts the necessity of measures to address impacts that may arise, yet leaves open the possibility that Scottish Ministers might reach a different conclusion regarding the presence or severity of any adverse effects. This approach reflects a cautious and procedural step towards mitigation but does not in itself resolve the question of whether significant effects on the protected site can be avoided.

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 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.

1.1.446 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 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.

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.

1.1.447 Public Engagement, Site Selection and Environmental Information

There is a significant uncertainty regarding the adequacy of public participation in the consultation process associated with the site-selection and application stages. The applicant places considerable weight on the site-selection process, making the quality of public involvement in that process directly material to the legitimacy of the decisions sought. However, deficiencies in participation identified at the plan and site-selection stages have persisted into the application stage. The application itself consists of many thousands of pages of technical material, yet the consultation period has coincided with the busiest months of the year for island communities, a time when residents are fully engaged in continuous work throughout the visitor season and access to specialist advice is particularly limited. This contrasts starkly with the applicant's position, having had years and substantial professional and financial resources to prepare its case.

Furthermore, GEN 18 of the National Marine Plan, together with the principles of effective public participation enshrined in the Aarhus Convention, require that those affected by decisions of such magnitude are afforded a realistic opportunity to engage meaningfully. The conditions under which the affected communities have

been compelled to respond fall short of this standard. Given these circumstances, it is essential that Ministers bear this firmly in mind when considering the representations made, as the shortcomings in consultation undermine the credibility and fairness of the site-selection process.

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.

1.1.448 Effects on Local Area

There is significant uncertainty regarding 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. Despite Islay and Colonsay being the closest islands to the development area—lying immediately north-west of Islay and west of Colonsay—the application primarily considers Islay as a potential project location rather than as an affected island community. This approach overlooks the Atlantic-facing communities of Islay, which directly face the nearest edge of a 448 square kilometre development area, without any place-based evaluation of impacts on their setting, economy, or community life.

Colonsay and Oronsay are similarly under-assessed, particularly given that their seaward outlooks, which define daily life, face directly towards the proposed array. Of particular concern is the North Colonsay and Western Cliffs Special Protection Area along Colonsay's coastline, which is central to the applicant's derogation case and compensation plan. This acknowledgement in the application confirms that harm to the internationally protected seabird population of these cliffs cannot be ruled out, indicating a direct and significant environmental effect that requires thorough consideration.

Additionally, Oronsay Priory, a scheduled monument of national importance located within the community's area, is subject to the same gaps identified in the heritage assessment, especially regarding the evaluation of its open maritime setting. Taken together, these points demonstrate that the applicant's assessment inadequately addresses the direct and significant effects on the communities, economy, and

heritage of Islay, Colonsay, and Oronsay, thereby undermining the credibility 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 proposed development, extensive visibility, and a large geographical extent of change. The assessment identifies a Moderate and Significant overall effect across approximately 21 kilometres, with turbines spanning around 39 degrees of the horizon. The West Coast of Iona is similarly acknowledged as highly sensitive with widespread visibility, and the applicant accepts that significant effects will be experienced by residents and visitors throughout much of the island, including at Dùn Ì, the island's highest point.

Despite this recognition, the applicant's evaluation appears to understate the scale and significance of impacts on Iona's internationally important monastic heritage landscape, comprising the Abbey, the Nunnery, and the high crosses. These heritage assets are intrinsically linked to pilgrimage, arrival by sea, and movement through the landscape, factors emphasised in the applicant's own baseline studies. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing itself, yet the applicant has not provided visualisations from critical vantage points such as the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn. This omission limits a full understanding of the visual effects on the heritage setting.

Community concerns further illustrate the potential underestimation of impacts. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal, highlighting strong local opposition. Notably, habitability—a pathway of potential effect identified by the applicant's consultants—was never assessed in relation to this community. To appreciate the scale of the turbines' visual dominance, the applicant's evidence compares them to the familiar landmark of Ben Hynish on Tiree, which at 141 metres is visible from Iona at approximately 33 kilometres; the proposed turbines would overtop Ben Hynish by about 194 metres at roughly two-thirds of that distance, emphasising their imposing presence. Taken together, these points suggest that the applicant's environmental and social impact evaluation does not fully capture the magnitude of effects on Iona.

The applicant's assessment acknowledges significant effects on 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 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 applicant's Environmental Statement assesses the South Tiree coastal area, situated approximately 35 kilometres from the proposed development, as having High sensitivity but attributes a Low magnitude of change to the effects on this landscape. This combination underpins their overall evaluation of the impact on Tiree's coastal character.

However, Tiree's landscape is uniquely defined by its exceptionally low-lying topography, with the highest point, Ben Hynish, reaching only 141 metres. The island's character derives from the dominance of sea and sky and an open oceanic horizon. Introducing turbines of up to 335 metres in height would result in vertical elements unprecedented in the seascape. Such large-scale structures would fundamentally alter the visual and experiential qualities of the landscape.

Given this context, the conclusion of a Low magnitude of change appears to significantly understate the true extent of impact on Tiree's sensitive and distinctive landscape character. This understatement calls into question the reliability of the applicant's assessment, which fails to fully reflect the magnitude of change likely to be experienced by this highly sensitive receptor.

The applicant's assessment fails to address significant effects on mainland and island communities whose outlooks and economies are closely tied to the seascape in question, thereby undermining the comprehensiveness of the evaluation. Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by residents, faces the development from the east, yet no examination has been made of how the proposal might impact its delicately balanced community and economy. Similarly, Ardnamurchan Point, as the most westerly 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 that the objection identifies, yet they remain unassessed. Furthermore, the west coast of Kintyre comprises a chain of communities whose character and visitor economy are defined by the open Atlantic seaboard facing Islay, Jura, and the wider waters beyond. The Treshnish Isles, along with other small islands and mainland coasts viewing the development area, share this position and their sensitivities have been overlooked. Collectively, these omissions represent a substantial gap in the assessment, which compromises the ability to fully understand and mitigate the proposal's potential impacts on these valued seascapes and dependent communities.

The applicant's assessment systematically moderates and discounts the magnitude of change experienced by highly sensitive receptors situated beyond approximately 20 kilometres, resulting in an underestimation of significant effects. This methodological approach is evident in the treatment of numerous locations where

the environmental impact is diminished in the analysis solely due to their distance from the development, despite the sensitivity of the receptors involved.

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

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

1.1.449 Personal Observations

In addition to the planning matters above, I am personally concerned because: I don't live in this area of Scotland, but it has been my family's chosen holiday destination for the last 35 years. The peace, the beauty, the wildlife, the wonderful people, all make this a very special place. We are rapidly reducing and devastating the natural landscapes of the British Isles, squeezing wildlife into smaller and smaller areas, which they then have to share with disruptive humans. It is time to nake a stand and find alternative ways of producing clean energy that doesn't sacrifice the land, the ocean, and the wildlife that live there. Most of the people in this part of Scotland rely on tourism to provide them with the economic means to live a purposeful life. The average tourist loves this area of Scotland because of its scenery and wildlife and will stop travelling there if those things become spoiled or disappear.

Based on my own local knowledge, I also wish to highlight that: I think I answered this to the best of my ability within my response to the previous question.

Finally, I would also ask the Scottish Ministers to consider: See previous answers.

1.1.450 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 coastal communities and their heritage. However, independent scrutiny of the applicant’s documentation reveals that these effects have been understated, and that an essential heritage assessment has not been conducted. Furthermore, while the detrimental impacts on the island communities have been identified, no formal assessment of these effects has taken place. Additionally, the ecological tests mandated by policy remain unproven as achievable. It is also

notable that the application before the Scottish Ministers represents only a portion of the entire project.

Given these substantial 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 approval, it is requested that they require the submission of further environmental information alongside enhanced visualisations. Moreover, determination of the applications should 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 requested that the Ministers provide explicit conclusions within their decision, 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 649
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, which are currently under consideration through applications 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 objection is lodged against the scheme promoted 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 decision regarding these applications.

The project involves the development of an offshore wind farm with an anticipated capacity of around 2 gigawatts. It proposes the installation of between 91 and 144 turbines, each reaching a maximum height of 335 metres to blade tip. The site encompasses approximately 448 square kilometres of marine area situated to the north-west of the island of Islay and to the west of Colonsay, positioned roughly 21 kilometres from Iona. This location lies in proximity to several islands and coastal communities within the southern Hebrides.

The grounds for objection are set out below and are framed within the applicable statutory and policy context governing the determination of these applications. It is important to emphasise that the onus lies with the applicant to provide robust and sufficient evidence demonstrating compliance with all relevant statutory tests and planning policies. Objectors are not required to disprove the proposals but may rely on the absence or insufficiency of the applicant's evidence. In this instance, the applicant has failed to meet the requisite burden of proof, and accordingly, consent ought to be withheld.

1.1.451 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 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, the introduction of aviation and navigation lighting represents an unavoidable change to the night-time seascape character. Currently, the sea horizon is unlit, and the permanent addition of such lighting over the 35-year operational period would fundamentally alter this aspect of the seascape. It is important to note that the operational lifespan does not confine the extent of harm in planning terms; consenting to the development effectively signifies acceptance that this seascape is appropriate for wind farm use. Therefore, despite potential mitigations, the development would result in a lasting and significant transformation of the night-time seascape character.

The proposal'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.

1.1.452 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment purports to follow Historic Environment Scotland's recognised methodology for evaluating effects on the setting of historic assets, a process developed through consultation with Historic Environment Scotland itself. This methodology mandates a careful evaluation of whether any changes to setting affect the contribution that setting makes to the cultural significance of heritage

assets, with particular attention to whether the integrity of setting is adequately retained. Importantly, it emphasises that visual change alone should not be equated directly with adverse impact. Despite this clear framework, the applicant's assessment fails to demonstrate compliance with these essential evaluative steps.

A Methodological Audit, undertaken in support of community objections and relying solely on the applicant's own Appendix 14.3, reveals that while the operational assessment identifies relevant heritage attributes, it does not show how the integrity of setting has been rigorously assessed in line with the accepted methodology. Instead, the assessment confines itself to describing visual changes—such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—and then summarily concludes that the integrity of setting is adequately retained. This critical evaluative phase, which distinguishes the methodology, is absent from all examined examples. Consequently, the reliability of the applicant's conclusions regarding heritage impacts is fundamentally undermined.

The applicant's 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 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'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.

1.1.453 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 own consultants acknowledge habitability as a potentially significant pathway through which the proposal could impact island communities, yet no assessment of the habitability of these affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 operates at a regional scale, focusing in detail on potential port communities while failing to provide an equivalent place-based analysis of the island communities directly facing the development. Despite this absence, the assessment concludes that these island communities exhibit low sensitivity to tourism effects.

This approach is fundamentally flawed, as small island economies are not accurately represented by regional averages. Their economies are highly concentrated in sectors most vulnerable to changes in the qualities that attract visitors. Moreover, reliance on increasing visitor numbers amplifies rather than mitigates this sensitivity, deepening economic dependence on the very attributes at risk. Therefore, the conclusion of low sensitivity, reached without any place-based analysis, lacks evidential basis and amounts to an unfounded assumption.

The proposal fails to comply with the necessary planning policies and statutory duties relating to island communities. Specifically, it does not meet the requirements

set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions be founded on robust socio-economic evidence and adopt a precautionary approach when such evidence is insufficient. Furthermore, the proposal falls short of the expectations of NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, both of which emphasise the importance of assessing and giving due weight to the interests of island communities through meaningful engagement throughout the planning process.

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

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

1.1.454 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 targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are typically prepared when the potential for adverse effects on the integrity of a protected site cannot be definitively ruled out. Their very submission signals the applicant's acknowledgement of possible impacts and the need for measures to address them under derogation provisions.

Notably, the inclusion of these documents indicates that the applicant anticipates that Scottish Ministers might reach a different conclusion regarding adverse effects than the applicant's own assessment. This recognition highlights a degree of uncertainty and underscores the importance of the derogation and compensation proposals as integral components of the application's approach to mitigating potential harm to the protected guillemot population.

When considering developments that may impact protected habitats, it is important to recognise that mitigation, compensation measures, and future monitoring plans, while valuable, do not alone satisfy the stringent legal requirements set out under the Habitats Regulations. Unlike measures that may reduce or offset potential harm, these proposals cannot substitute for the fundamental evidential standard required to demonstrate that a development will not adversely affect the integrity of a protected site. This distinction underscores the necessity for applicants to provide robust, conclusive evidence at the outset, rather than relying on subsequent interventions.

The legal framework governing such consent is exacting and unequivocal. Under the Habitats Regulations, consent may only be granted where the competent authority has ascertained, beyond reasonable scientific doubt, that the proposal will not adversely affect the integrity of the protected site. This high evidential threshold is non-negotiable unless the strict derogation tests are satisfied, which themselves impose rigorous conditions. The responsibility to demonstrate compliance with these statutory tests rests squarely with the applicant, emphasising that the burden of proof is both substantive and procedural.

This legal context is reinforced by related policy provisions, including GEN 9 and GEN 13 of the National Marine Plan and Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. These policies collectively affirm the imperative to protect marine and terrestrial habitats through careful planning decisions that adhere to statutory requirements. The cumulative effect of these legal and policy instruments ensures that development consent processes maintain a high standard of environmental protection, reflecting the critical importance of conserving biodiversity and ecosystem integrity.

The 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.

1.1.455 Cumulative and In-Combination Effects

The current approach to assessing the proposed development is fundamentally flawed when compared to established principles of project evaluation and mitigation. Mitigation measures rely on a full understanding of the project's cumulative impacts, yet in this case, only a portion of the development—the wind farm itself—is before the Scottish Ministers. Critical components such as the export cable corridor and onshore transmission works, without which the wind farm cannot operate, are deferred to separate, subsequent applications. This piecemeal consideration

prevents a holistic appraisal of the project's overall effects and undermines the ability to implement effective and comprehensive mitigation strategies.

This fragmented assessment approach runs counter to the legal precedent set in Raeshaw Farms, which affirms that projects must be evaluated in their entirety rather than being artificially divided into smaller parts whose individual impacts appear less significant. By deferring key elements to later consenting processes, the decision-making body is unable to consider the full scope of environmental and other impacts at the principal decision stage. Consequently, the assessment is incomplete and procedurally unsound, as it denies a proper cumulative evaluation and impairs informed decision-making on the project as a whole.

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

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

The 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.

1.1.456 Public Engagement, Site Selection and Environmental Information

The shortcomings in public participation and the timing of consultation materially diminish the credibility of the site-selection process, particularly when compared to the rigorous standards expected under GEN 18 of the National Marine Plan and the Aarhus Convention's principles. The applicant invites Scottish Ministers to place significant weight on the site-selection process; however, this is undermined by persistent deficiencies in engagement at both the plan and application stages. Notably, the consultation period coincided with the busiest months for island communities, who face continuous work throughout the visitor season and reduced access to specialist advice. This contrasts sharply with the applicant's extensive preparation, supported by substantial professional and financial resources over several years. Given these imbalances, those affected have not been afforded a realistic opportunity to participate in decisions of such consequence. It is therefore essential that Ministers carefully consider the limitations of the consultation process when evaluating the representations submitted.

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.

1.1.457 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 acknowledges some significant effects on Iona, particularly in terms of visibility and community impact, their assessment appears to underestimate the scale and importance of these effects when compared to established mitigation benchmarks. The Coastal Character assessment designates the Sound of Iona as having high sensitivity, with direct orientation towards the development and extensive visibility. It notes a large geographical extent of change, encompassing approximately 21 kilometres, with turbines spanning around 39 degrees of the horizon, resulting in a moderate and significant overall effect. This level of impact surpasses typical thresholds where mitigation measures are expected to be robust and comprehensive.

Moreover, the applicant's recognition of significant effects on residents and visitors across much of the island, including at Dùn Ì—the highest point on Iona—does not fully account for the island's exceptional heritage context. Iona's monastic landscape, comprising the Abbey, the Nunnery, and the high crosses, holds international significance, intrinsically linked to pilgrimage routes, sea arrival, and movement through the landscape. Despite Historic Environment Scotland's request for additional viewpoints, such as from the ferry crossing and elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, these visualisations are absent from the applicant's submission. This omission limits a comprehensive understanding of the potential heritage impacts, thereby undermining the thoroughness of the environmental and social impact evaluation.

Community concern further highlights the shortcomings of the applicant's assessment. A household consultation on Iona revealed that 92 per cent of respondents oppose the proposal. Notably, habitability—a pathway of potential effect identified by the applicant's own consultants—remains unassessed. The perceived scale of the development is considerable; for context, Ben Hynish on Tiree, a familiar landmark standing 141 metres high and visible from Iona at about 33 kilometres, would be overtopped by the largest turbines by approximately 194 metres at roughly two-thirds of that distance. This comparison underscores the significant visual intrusion likely to be experienced. Taken together, these points suggest that the applicant's evaluation does not fully capture the magnitude of impacts on Iona,

indicating a need for a more detailed and nuanced assessment to inform decision-making.

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

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

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

The applicant's assessment of the impacts on wider seaboard designated landscapes and island communities appears to 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 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 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.

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.

1.1.458 Personal Observations

In addition to the planning matters above, I am personally concerned because: It affects the monetary where we would visit

Based on my own local knowledge, I also wish to highlight that: Yes, the monestaries opinions should be held higher than government desires

1.1.459 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy obligations governing its determination. The applicant’s own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the local communities and heritage of the coastal area. However, independent scrutiny of the submitted documents reveals that these impacts have been understated, with a critical heritage assessment conspicuously absent. Furthermore, while the effects on the island communities affected by the development were acknowledged, no comprehensive assessment of these impacts has been undertaken. In addition, the ecological tests required by policy have not been demonstrated as achievable. It is also pertinent to note that the application before the Scottish Ministers pertains only to a portion of the overall project.

Given these substantial shortcomings, it is urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm and reject the related marine licence application. Should the Ministers consider otherwise, it is requested that the applicant be required to provide further environmental information alongside enhanced visualisations. Moreover, any decision should be deferred until after a public inquiry, affording a thorough examination of the concerns raised in this objection. Regardless of the outcome, it is further requested that the Ministers issue explicit conclusions within their decision statement concerning the project's effects on cultural heritage and on the impacted island communities.

Yours faithfully,

[Redacted]

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

Member of the public 650
Dear Sir/Madam,

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

I request that this correspondence be recorded as a formal objection, that my details be registered accordingly, and that I receive notification of the final determination concerning these applications.

The following considerations outline the planning and environmental grounds underpinning this objection, assessed within the relevant statutory and policy context governing these applications. It is essential to note that the onus lies wholly with the applicant to provide robust and sufficient evidence demonstrating compliance with the applicable statutory tests and policy requirements. Objectors are not obligated to substantiate the contrary position. Based on the analysis presented herein, it is clear that the applicant has failed to meet this evidential burden, and as such, the applications ought to be refused consent.

1.1.460 Legislative and Policy Framework

The application fails to adequately address the statutory duties set out in Schedule 9 of the Electricity Act 1989. Schedule 9 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 also required to have regard to these same statutory duties.

The evidence demonstrates that compliance with these statutory requirements has not been satisfactorily demonstrated. There are clear deficiencies and omissions in the application’s consideration of these duties, and conflicts with the applicable legal and policy framework remain unaddressed. Such failures weigh decisively against the granting of consent for the proposal.

The marine licence application under consideration must be determined in accordance with Part 4 of the Marine (Scotland) Act 2010 and the policies set out in Scotland’s National Marine Plan. The statutory framework requires that authorisation decisions align with the National Marine Plan unless relevant considerations indicate

otherwise. Central to this assessment are the General Policies GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts). Compliance with these policies is an integral part of the statutory evaluation of the application.

A detailed examination of the application reveals that compliance with these statutory policies has not been demonstrated. The evidence identifies deficiencies and omissions in the application's approach to co-existence with existing marine users, failing to satisfy the requirements of GEN 4. There is an absence of adequate assessment or mitigation measures addressing potential impacts on the historic environment, contrary to GEN 6 and the guidance in paragraphs 4.22 to 4.23. Similarly, the application does not sufficiently consider effects on landscape and national scenic areas as required by GEN 7 and paragraph 4.28, nor does it adequately address natural heritage concerns under GEN 9.

Furthermore, the application falls short in demonstrating effective engagement with stakeholders, a requirement under GEN 18, and does not provide sound evidence in accordance with GEN 19 and paragraph 4.81. The cumulative impacts of the proposal, which must be assessed under GEN 21 and paragraph 4.85, are not properly evaluated or mitigated. These shortcomings represent clear conflicts with the applicable legal and policy framework.

Given these identified deficiencies, omissions, and conflicts, the application fails to meet the statutory requirements of the Marine (Scotland) Act 2010 and the National Marine Plan policies. As such, these matters weigh decisively against the granting of consent for the marine licence. The application should therefore be refused on the grounds of non-compliance with the statutory marine planning framework.

The proposal fails to demonstrate compliance with the mitigation requirements set out in National Planning Framework 4, specifically in relation to Policies 3, 4, 7, and 11. These policies address critical areas including biodiversity, natural places, historic assets, and energy. The application does not provide sufficient evidence to show that the necessary measures to protect and enhance biodiversity and natural places have been adequately incorporated. Furthermore, there is a lack of clarity and completeness regarding the safeguarding of historic assets and the sustainable energy provisions required by the framework. This absence of demonstrated mitigation measures directly conflicts with the statutory duties and legislative requirements that must be applied alongside the National Planning Framework 4.

Given that compliance with these key policies has not been established, and considering the identified deficiencies and omissions within the submitted evidence, the proposal is in conflict with the applicable legal and policy framework. National Planning Framework 4 is a significant material consideration, and where such conflicts exist, they weigh decisively against the granting of consent. Therefore, the proposal should be refused on the basis that it fails to meet the essential policy requirements designed to protect biodiversity, natural places, historic assets, and energy sustainability as mandated by the National Planning Framework 4.

The proposal fails to comply with the mandatory requirements for environmental impact assessment and habitats regulations assessment, rendering the application legally deficient and unsuitable for approval. Under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, it is a statutory obligation that the likely significant environmental effects of the development are identified, thoroughly assessed, and transparently reported prior to any determination. This procedural prerequisite has not been satisfied in the current submission. Furthermore, the Habitats Regulations impose a clear duty to assess the effects of the proposal on European protected sites in accordance with the applicable statutory tests. The evidence before the determining authority does not demonstrate compliance with these requirements. Instead, it reveals deficiencies and omissions in the environmental information provided, as well as a failure to undertake the necessary habitats regulations assessment. Such shortcomings constitute a direct conflict with the relevant legal and policy framework. In accordance with established principles, where compliance with these statutory duties has not been demonstrated, and where the evidence identifies such material deficiencies, these matters must weigh decisively against the granting of consent. Therefore, on the basis of the inadequate environmental impact assessment and the absence of a compliant habitats regulations assessment, the application should be refused.

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

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

The applicant has failed to discharge the fundamental responsibility to demonstrate compliance with all relevant statutory duties, planning policies, and environmental assessment requirements through robust, objective, and proportionate evidence. This evidential burden is a prerequisite for the lawful consideration of the proposal and has not been met in this case.

The absence of such demonstration, coupled with identified deficiencies and omissions in the submitted evidence, directly conflicts with the applicable legal and policy framework. These shortcomings undermine the integrity of the planning process and preclude a lawful grant of consent.

Accordingly, in accordance with established principles, the unresolved evidential gaps and conflicts must weigh decisively against the approval of this application. The proposal cannot be considered compliant or acceptable without the applicant first fulfilling their clear and unequivocal evidential obligations.

1.1.461 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 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.

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.

1.1.462 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 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 development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, thereby permanently altering the character of the night-time seascape for the proposed 35-

year operational life. This impact is not limited to the operational timeframe, as consenting to the development effectively designates this seascape as suitable for wind farm use, establishing a lasting precedent in policy terms. Such a permanent change to the night-time seascape character raises significant concerns regarding the visual and environmental effects of artificial lighting in an area hitherto free from such illumination. Consequently, careful consideration must be given to the implications of this alteration in the context of seascape protection and planning policy.

The proposal's 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.

1.1.463 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 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 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.

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.

1.1.464 Effects on Island Communities, Tourism and the Local Economy

The proposal poses a direct threat to the economic and social sustainability of the island communities by undermining the very qualities that attract visitors. These communities rely exceptionally heavily on visitors drawn specifically by the landscape, seascape, cultural heritage, tranquillity, and remoteness identified in the applicant's own baseline assessments. Any alteration to these attributes will therefore have an immediate and detrimental impact on the visitor economy.

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

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

The applicant's 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 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.

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

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

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

The applicant's evidence confirms that, under the Habitats Regulations, planning consent may only be granted once the competent authority has ascertained that the proposed development will not adversely affect the integrity of the protected site, unless the stringent derogation tests are fully satisfied. Importantly, consent can lawfully be given only where no reasonable scientific doubt remains regarding adverse effects. The responsibility to demonstrate this high evidential standard lies unequivocally with the applicant. It is further clarified that mitigation measures,

compensation proposals, and future monitoring alone do not suffice to meet the statutory tests required by law. This legal framework is reinforced by policy provisions within GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). Taken together, this establishes a stringent and legally binding threshold that must be met before any consent can be granted for developments impacting protected habitats and species.

The applicant's 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.

1.1.466 Cumulative and In-Combination Effects

The current assessment process for the proposed development is fundamentally flawed because it fails to consider the project in its entirety. By excluding the export cable corridor and onshore transmission works—both essential for the wind farm's operation—from the application before the Scottish Ministers, the process fragments the project into separate parts. This fragmentation results in the effects of the entire development never being assessed collectively.

This piecemeal approach undermines the integrity of the environmental and planning evaluation. Key components that are critical to the project's functioning are deferred to future applications, meaning that important impacts will be considered only after the principal decision has been made. Such an approach prevents a holistic understanding of the project's cumulative effects, which is necessary to inform sound decision-making.

Moreover, this method conflicts with established legal principles. The courts, notably in the case of Raeshaw Farms, have affirmed that a project must be assessed as a whole rather than being "salami-sliced" into smaller parts whose individual effects may appear less significant. Therefore, the current approach is not only procedurally deficient but also legally unsound, and it should be reconsidered to ensure a comprehensive and lawful assessment of the entire development.

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 cumulative effects. The proposal fails to demonstrate that the cumulative and in-combination effects have been comprehensively identified and assessed, in accordance with GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the requirements of the Environmental Impact Assessment Regulations. Crucially, the treatment of deferred works has not been explicitly addressed, leaving a gap in the decision-making process. It is therefore essential that the assessment of these deferred elements be clearly and explicitly considered before any determination is made.

1.1.467 Public Engagement, Site Selection and Environmental Information

The consultation process associated with the site-selection and application stages has exhibited significant deficiencies in public participation, which critically undermines the legitimacy of the decision-making framework. The applicant places considerable weight on the site-selection process, rendering the quality of public engagement directly material to the determination. However, the extensive technical documentation submitted spans many thousands of pages, and the consultation period has coincided with the peak months of the year for island communities. During this time, local residents are engaged continuously in the visitor season, while access to specialist advice is notably limited. This disparity is accentuated by the applicant's prolonged preparation period, supported by substantial professional and financial resources, highlighting an imbalance that compromises effective participation.

Furthermore, the requirements set out in GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, mandate that those affected must have a realistic opportunity to engage meaningfully in decisions of such significance. The conditions under which the affected communities have been expected to respond fall short of these standards. It is therefore imperative that Ministers give careful consideration to these shortcomings in public participation when evaluating the representations submitted, recognising the impact these procedural inadequacies may have on the fairness and integrity of the site-selection process.

The 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.

1.1.468 Effects on Local Area

The applicant’s assessment acknowledges Islay and Colonsay as the closest islands to the development area, which lies immediately north-west of Islay and west of Colonsay. However, the application predominantly evaluates Islay only as a potential project location rather than as a distinct island community subject to direct effects. Notably, the Atlantic-facing communities of Islay confront the nearest edge of a substantial 448 square kilometre development area, yet there is no place-based analysis of how this proximity might affect their setting, local economy, or community life. This omission undermines the assessment’s comprehensiveness in addressing the real and tangible impacts on Islay’s residents.

Regarding Colonsay and Oronsay, the daily lives of these communities are intimately connected to their seaward outlook, which faces the development array directly. The North Colonsay and Western Cliffs Special Protection Area, situated along Colonsay’s coastline, is central to the applicant’s derogation case and compensation plan, implicitly acknowledging that harm to the internationally protected seabird populations cannot be ruled out. Furthermore, Oronsay Priory, a nationally important scheduled monument, lies within this community’s area. The identified gaps in the heritage assessment similarly apply here, particularly concerning the treatment of the priory’s open maritime setting. Taken together, these considerations demonstrate that the application underestimates the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, casting doubt on the reliability of the overall environmental and heritage impact evaluation.

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

Across the wider extent of Mull, a similar pattern emerges. The applicant accepts significant effects on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is assessed as having high sensitivity throughout, with

viewing distances ranging from 21 to 33 kilometres. Yet, the magnitude of impact is consistently rated no higher than medium. This discrepancy underlines a methodological approach reliant on distance to downplay the potential visual and experiential impacts. For instance, in the Wilderness and Gribun Rocks coastal area, the assessment dismisses the scale of change as small due solely to viewing distances exceeding 30 kilometres, a reasoning that appears insufficient to capture the character and quality of the seascape valued by communities and visitors alike.

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

The applicant's assessment significantly underestimates the 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 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.

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 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.

1.1.469 Personal Observations

In addition to the planning matters above, I am personally concerned because: Would affect my community as a Scotland resident, by ruining the stunning landscape and affecting businesses as a result.

Based on my own local knowledge, I also wish to highlight that: Wildlife and viewpoints

1.1.470 Summary

The proposal for the MachairWind Offshore Wind Farm has not been substantiated in accordance with the relevant statutory and policy frameworks that govern 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 region. However, published analyses of the applicant's submissions reveal that the scale of these impacts has been underestimated. Crucially, the necessary heritage assessment has not been completed. Furthermore, although effects on the island communities potentially affected were identified, no formal assessment of these impacts has been undertaken. In addition, the ecological criteria required for approval have not been demonstrated as achievable. It is also pertinent to note that the application before the Scottish Ministers pertains only to a portion of the overall project.

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 the application outright, I request that they require the submission of further environmental information accompanied by enhanced visualisations. I also propose that the determination of these applications be deferred until after 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 stated reasons, particularly with respect to the effects upon 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 651
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, as detailed in application 00012385 seeking consent under section 36 of the Electricity Act 1989, and application 00012386 requesting a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications, submitted by MachairWind Limited (ScottishPower Renewables), should be recorded accordingly, and I request to be notified of the final decisions.

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

The following sections articulate the grounds for objection based on planning and environmental considerations, framed within the relevant statutory and policy context governing the determination of these applications. It is important to emphasise that the onus lies with the applicant to substantiate, through robust evidence, that the statutory tests and policy requirements are met. Objectors bear no obligation to demonstrate the contrary. Having carefully reviewed the submissions and supporting documentation, I conclude that the applicant has failed to satisfy this evidential burden, and therefore, consent ought to be refused.

1.1.471 Legislative and Policy Framework

The application fails to provide the requisite Environmental Impact Assessment (EIA) and Habitats Regulations Assessment (HRA) as mandated by law, creating significant uncertainty regarding the proposal’s compliance with statutory environmental safeguards. Under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations, it is a legal requirement that the likely significant environmental effects of any such proposal be thoroughly identified, assessed, and reported prior to any determination. This procedural obligation 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 absence of a demonstrable compliance with these regulations in the submitted documentation constitutes a fundamental deficiency.

Where compliance with these statutory requirements has not been demonstrated, or where the evidence reveals deficiencies, omissions, or conflicts with the applicable legal and policy framework, such failures must weigh decisively against the granting of consent. In this case, the lack of adequate EIA and HRA documentation means

that the proposal cannot be considered lawful or compliant with the established environmental protection regime. Consequently, the application should be refused on the grounds of non-compliance with mandatory environmental assessment obligations.

There is significant uncertainty as to whether the proposal has properly considered and given due weight to the interests of island communities, as mandated by the Islands (Scotland) Act 2018. This statutory requirement is clear: the interests of island communities must be explicitly taken into account during the decision-making process. The evidence before the determining authority does not demonstrate compliance with this obligation. Moreover, the absence of any substantive assessment or acknowledgment of island community interests constitutes a clear deficiency and omission in the application. Such failure directly conflicts with the applicable legal and policy framework established by the Islands (Scotland) Act 2018. In accordance with established principles, where compliance with statutory duties is not demonstrated, and where deficiencies and omissions are evident, these matters must weigh decisively 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 law, the application should be refused.

1.1.472 Conflict with National Planning Framework 4 and the Development Plan

The practical consequence of the proposal as submitted is that it would result in significant adverse effects on nationally important designated assets, undermining the protective aims of several key policies within NPF4. Specifically, the proposal would adversely impact National Scenic Areas and other nationally important landscapes, thereby failing to safeguard the qualities for which these areas have been designated. This outcome is at odds with the requirements of Policy 11 and its associated provisions, notably Policies 4(c) and 4(d), which collectively seek to prevent significant harm to such valued landscapes.

Moreover, the proposal does not adequately demonstrate how the cultural significance of scheduled monuments and their settings would be preserved. Policy 7, including its provisions under 7(h) concerning scheduled monuments and 7(c) and 7(d) relating to the setting of historic assets, demands robust protection of heritage interests. The evidence presented falls short of meeting these standards, raising concerns that the proposal would detrimentally affect the integrity and context of these nationally important heritage assets. This failure represents a clear conflict with the established policy framework aimed at conserving the historic environment.

In addition, the proposal does not satisfy the ecological requirements set out in Policy 3 on biodiversity, nor does it provide sufficient assurance that island communities, which are recognised as sensitive receptors, would be safeguarded. Taken together, these shortcomings demonstrate that the proposal is incompatible with multiple policies within NPF4 designed to protect designated landscapes, heritage assets, and biodiversity. As such, the proposal should not be supported in its current form given the significant and demonstrable conflicts with these critical national policy objectives.

There remains uncertainty as to how the proposal aligns with the terrestrial development plan framework, particularly the Argyll and Bute Local Development Plan 2. On land, the proposal would adversely affect landscape, heritage, and community interests that these policies are specifically designed to protect. Consequently, it is evident that the proposal conflicts with both the local development plan and the National Planning Framework 4 when considered in its entirety. The applicant has not provided sufficient evidence to dispel these conflicts, and therefore the proposal cannot be regarded as compliant with the relevant development plan policies.

1.1.473 Seascape, Landscape and Visual Effects

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

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

The practical consequence of 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 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.

1.1.474 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 complex array of qualities, notably including pilgrimage, arrival by sea, movement through a living cultural landscape, and the interrelationships between monuments, spirituality, and the encompassing landscape and seascape. These attributes are inherently experienced through dynamic movement rather than from fixed viewpoints, underscoring the importance of a comprehensive and nuanced understanding of the heritage context.

However, Historic Environment Scotland's consultation responses, as recorded within the application documentation, highlight a concern that the applicant's assessment may not adequately capture these wider experiential and cultural qualities. Specifically, Historic Environment Scotland requested the inclusion of additional viewpoints to ensure that the broader cultural landscape is properly represented. This indicates that the current assessment may underestimate the impact on the full range of heritage values, particularly those that are experienced through movement and spatial relationships, rather than static observation points. Such an omission risks an incomplete evaluation of heritage impacts, which is critical to informing appropriate planning decisions.

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.

1.1.475 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.

There remains considerable uncertainty regarding the adequacy of the socio-economic assessment for the island communities affected by the proposal. The applicant's own consultants acknowledged habitability as a potentially significant pathway of impact but subsequently failed to carry out any assessment specific to the habitability of those islands. Instead, Chapter 18's socio-economic evaluation focuses primarily on regional and port communities, neglecting an equivalent place-based analysis for the island populations directly facing the development. Despite this omission, the assessment nonetheless asserts that these island communities possess low sensitivity to tourism effects. This conclusion is fundamentally flawed. Small island economies cannot be treated as regional averages; their economic structures are concentrated in sectors most vulnerable to changes in the qualities attracting visitors. Moreover, reliance on increasing visitor numbers intensifies, rather than diminishes, their sensitivity by deepening dependence on the very attributes at risk. Thus, the claim of low sensitivity, reached without any targeted place-based analysis, lacks evidential basis and amounts to mere assumption. In closing, this significant methodological deficiency undermines confidence in the assessment's conclusions and leaves critical impacts on island communities insufficiently understood and unmitigated.

1.1.476 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.

There remains considerable uncertainty regarding the potential adverse effects of the proposed development on the integrity of the North Colonsay and Western Cliffs Special Protection Area, particularly concerning the guillemot population. The applicant has acknowledged this uncertainty by submitting a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan. Such documents are typically prepared precisely because an adverse effect on the protected site cannot be confidently excluded at this stage, signalling that the applicant accepts the possibility of such impacts.

The submission of these documents is a significant aspect of the application, indicating that the applicant recognises the need to address possible harm through derogation provisions and compensatory measures. However, it is important to note that, on the applicant's own approach, Scottish Ministers are not bound to agree with the applicant's conclusions regarding the absence of adverse effects. This underscores the ongoing uncertainty and reinforces the importance of a cautious and thorough assessment before any final decision is made.

1.1.477 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 have been thoroughly identified and assessed, contrary to 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. This omission

raises significant concerns about the adequacy of the environmental impact appraisal for the project as a whole.

Furthermore, the environmental assessment does not explicitly address the deferred works, which are integral to understanding the full scope and impact of the development. Without clear consideration of these elements, the decision-making process cannot fully account for potential adverse effects, undermining compliance with established policy and regulatory frameworks.

In light of these issues, it is essential that the treatment of deferred works be expressly addressed in the determination to ensure full compliance with planning policies and environmental legislation. Failure to do so would represent a material shortcoming in the assessment and could lead to uninformed decision-making.

1.1.478 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 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.

1.1.479 Effects on Local Area

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

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

The applicant's Coastal Character assessment recognises the Sound of Iona as an area of High sensitivity with 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.

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 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 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 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.

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.

1.1.480 Personal Observations

In addition to the planning matters above, I am personally concerned because: Permanent' alteration to an area of amazing beauty.
We are already seeing loss of habitat and depopulation of birds and mammals.I for one would like our lovely country to be enhanced and expand our commitment to protect wildlife Our beautiful landscape will be destroyed by these huge monstrosity's.

Based on my own local knowledge, I also wish to highlight that: Our rivers and streams have been neglected for numerous years it's time to return them to free flowing and decrease the flooding that occurs regularly due to inadequate river maintenance.

1.1.481 Summary

The proposal before the Scottish Ministers fails to demonstrate compliance with the relevant statutory and policy framework governing its determination. The applicant's own evaluation acknowledges substantial impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal region. However, published analyses of the applicant's documentation reveal that the magnitude of these impacts has been underestimated, and crucially, the necessary heritage assessment has not been conducted. Moreover, while the effects on the island communities impacted by the development were identified, no assessment of these effects has been undertaken. The ecological requirements associated with the project remain unproven as capable of being met. It is also pertinent to note that only a portion of the entire project is currently submitted for consideration by the Scottish Ministers.

In light of these significant shortcomings, it is respectfully submitted that both consent for the MachairWind Offshore Wind Farm and the corresponding marine licence should be refused. Should the Scottish Ministers contemplate granting approval, it is requested that they first require the submission of additional environmental information and enhanced visualisations to clarify the full extent of impacts. Furthermore, any determination should be deferred until after a public inquiry, thereby ensuring that the concerns raised in this objection are thoroughly examined in an open and transparent forum. Regardless of the final decision, it is further requested that the Ministers explicitly address and provide reasoned conclusions regarding the effects on cultural heritage and the island communities affected by the proposal.

Yours faithfully,

[Redacted]

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

Member of the public 652
Dear Sir/Madam,

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

The proposal concerns the construction of an offshore wind farm with a generating capacity in the region of 2 gigawatts. The development envisages between 91 and 144 turbines, each with a maximum height of up to 335 metres to blade tip. This facility would occupy a Windfarm Development Area extending over approximately 448 square kilometres of sea, located north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in proximity to the islands and coastal settlements of the southern Hebrides.

The following analysis outlines my objections grounded in planning and environmental considerations, assessed against the pertinent statutory and policy frameworks governing the determination of these applications. It is important to emphasise that the onus lies squarely with the applicant to furnish sufficient evidence demonstrating compliance with the applicable tests. Objectors carry no obligation to prove the contrary. Upon careful evaluation of the evidence presented, it is clear that the applicant has failed to meet this burden, and accordingly, the applications should be refused consent.

1.1.482 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 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 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.

1.1.483 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 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.

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 applicant acknowledges that the proposed development results in effects which engage National Planning Framework 4 (NPF4) Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as policies GEN 7 and paragraph 4.28 of the National Marine Plan. These policies collectively aim to safeguard nationally important landscapes and seascapes by ensuring that developments are carefully assessed for their impact on these valued environments.

However, the applicant has failed to demonstrate that its assessment of the scale of these accepted effects aligns with the methodology it has employed. Furthermore, there is no adequate evidence to show compliance with the policies designed to protect nationally significant landscape and seascape interests. This shortcoming raises significant concerns regarding the proposal’s conformity with the established planning framework and suggests that the development would not meet the requisite standards for environmental protection set out in the relevant policies.

1.1.484 Cultural Landscape, Archaeology and Historic Environment

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

Historic Environment Scotland’s methodology, as referenced by the applicant, mandates an evaluation focused on whether changes to setting affect the contribution it makes to the cultural significance of heritage assets, not merely an account of visual alterations. Crucially, it specifies that visual change should not be equated directly with adverse impact. However, the applicant’s assessment primarily

describes visual change through factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, without explicitly assessing the integrity of setting itself.

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

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

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

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

The heritage impact conclusions 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 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.

1.1.485 Effects on Island Communities, Tourism and the Local Economy

The applicant's own baseline evidence confirms that the island communities affected by the proposed development rely exceptionally heavily on visitors who are drawn by specific qualities: landscape, seascape, cultural heritage, tranquillity and remoteness. These attributes are integral to the islands' appeal and underpin their visitor economy. Any alteration or degradation of these qualities would directly undermine the economic foundations of these communities. This, in turn, threatens the provision of local services, the retention of population, and ultimately the long-term viability of the islands as sustainable communities. The proposal thus poses a significant risk to the fundamental economic and social sustainability of the island communities by impacting the very characteristics that sustain their visitor-dependent economies.

The 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 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.

1.1.486 Cumulative and In-Combination Effects

The current planning application addresses only a portion of the proposed development, notably excluding the export cable corridor and the onshore transmission works, which are essential for the operational viability of the wind farm. Without these critical components, the project cannot function, yet they are deferred to separate, subsequent applications. This segmented approach results in a failure to assess the cumulative impacts of the entire development comprehensively, as the effects of these deferred elements will be considered after the primary decision has been made.

Such an approach is inconsistent with established legal principles, as affirmed by the courts in Raeshaw Farms, which emphasize that a project must be evaluated in its entirety rather than fragmented into smaller parts to minimize the perceived individual effects. By salami-slicing the project, the assessment process undermines the integrity of environmental and planning scrutiny, rendering the current evaluation incomplete and procedurally flawed. It is therefore imperative that the whole development, including all interdependent components, be subject to a unified and thorough assessment at this stage.

The practical consequence of relying on flawed baseline assessments is that the cumulative impact assessment is rendered unreliable and systematically underestimates the true combined effects of development proposals. This is because the cumulative assessments are contingent on conclusions drawn elsewhere in the Environmental Impact Assessment. Specifically, where the initial evaluations of landscape, heritage, and socio-economic effects have understated impacts—as detailed previously—the cumulative assessment similarly adopts this diminished baseline. As a result, the aggregate effects of the proposal under consideration, when combined with other existing, consented, and foreseeable developments, are correspondingly understated. This fundamental dependency undermines confidence in the cumulative impact conclusions and suggests that the full extent of combined development effects has not been appropriately accounted for.

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.

1.1.487 Public Engagement, Site Selection and Environmental Information

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

The Environmental Impact Assessment submitted with this application is insufficient for the Scottish Ministers to make a fully informed decision. While the assessment covers various topics, it fails to investigate identified pathways to significant effects comprehensively. For example, the landscape assessment's conclusions are based on a distance pattern not supported by its own stated methodology. Similarly, the heritage assessment does not adequately apply the integrity test it claims to use, and the socio-economic assessment lacks any place-based analysis relevant to the affected islands. Furthermore, the application inappropriately relies on future assessments, post-consent plans, monitoring, and additional approvals to address uncertainties, which conflicts with the requirement under the EIA Regulations that likely significant effects be understood before determination. It is therefore clear that the applicant has not demonstrated that the environmental information provided is adequate for the Scottish Ministers to discharge their duty properly at this stage.

1.1.488 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 are the closest inhabited islands to the development site—lying immediately north-west and west respectively—the application primarily considers Islay only in terms of its potential as a project location, rather than as a distinct island community facing direct impacts. The Atlantic-facing settlements of Islay border the nearest edge of the 448 square kilometre development area, yet no place-based evaluation has been undertaken to understand the implications for their local setting, economic activities, or community life.

For Colonsay and Oronsay, whose daily lives are defined by a seaward outlook directly facing the development, the applicant's assessment similarly falls short. The North Colonsay and Western Cliffs Special Protection Area, located on Colonsay's own coastline, is central to the applicant's derogation case and compensation plan, acknowledging that harm to its internationally protected seabird population cannot be excluded. Furthermore, Oronsay Priory, a scheduled monument of national importance, lies within this community's area, yet the heritage assessment fails to adequately address the impacts on its open maritime setting. These gaps collectively undermine the reliability of the environmental and heritage impact evaluation submitted.

While the applicant's assessment acknowledges certain impacts on Iona, a detailed analysis reveals that these effects are both more significant and more extensive than portrayed, thereby undermining the accuracy of the environmental and social impact evaluation. The Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity, with a direct orientation towards the development site and extensive visibility. The geographical extent of change is described as large, encompassing a distance of approximately 21 kilometres, with turbines spanning around 39 degrees of the horizon. This scale of visual intrusion is substantial, especially when considered alongside the West Coast of Iona, which is similarly assessed as highly sensitive with widespread visibility. The applicant concedes significant effects on residents and visitors across much of the island, including at its highest point, Dùn Ì.

The heritage value of Iona's monastic landscape further compounds these concerns. The Abbey, the Nunnery, and the high crosses are recognised as heritage assets of international importance, with their significance closely tied to pilgrimage, arrival by sea, and movement through the landscape. Despite Historic Environment Scotland's request for additional viewpoints—specifically from the ferry crossing itself—no visualisation has been provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, a notable omission that limits the understanding of the visual impact on key heritage experiences.

Community sentiment also underscores the scale of concern, with a household consultation revealing that 92 per cent of respondents on Iona object to the proposal. Notably, habitability—a pathway of potential effect identified by the applicant's own consultants—has not been assessed, leaving a critical aspect of social impact unexamined.

To contextualise the perceived scale of the turbines, a comparison with a familiar local landmark is instructive. Ben Hynish on Tiree, standing at 141 metres and visible from Iona at approximately 33 kilometres, would be dwarfed by the largest turbines, which would exceed Ben Hynish's height by about 194 metres while being situated at roughly two-thirds of the distance. This stark comparison highlights the overwhelming physical presence the turbines would have on the island's landscape.

In summary, the visual, community, and heritage impacts on Iona have been significantly underestimated in the applicant's assessment. The scale and significance of these effects warrant a more thorough and accurate evaluation to ensure that all potential consequences are fully understood and appropriately addressed.

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

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

Similarly, the Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed as having High sensitivity at distances of approximately 28 to 32 kilometres. The applicant attributes only a Medium to Low magnitude of effect, justifying this moderation by distance, apparent scale, and the retention of landforms. The Scarba, Lunga and the Garvellachs National Scenic Area, situated roughly 35 to 40 kilometres from the development, is treated in a comparable manner.

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

The applicant's assessment 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 several mainland and island communities that maintain direct visual and economic connections with the seascape surrounding the proposed development. Notably, Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by residents, faces the waters of the development site from the east. Despite the island's finely balanced community and economy, no examination of potential impacts on Gigha has been undertaken, leaving a critical gap in the appraisal of social and economic consequences. Similarly, Ardnamurchan Point, the westernmost point of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors along the entire peninsula. These seaward panoramas represent precisely the receptors to which the applicant's distance-based moderation is applied, thereby diminishing the perceived significance of potential visual impacts.

Further deficiencies in the assessment arise concerning the west coast of Kintyre, where a chain of communities derives its outlook, character, and visitor economy from the open Atlantic seaboard facing Islay, Jura, and the wider waters beyond. This area, together with the Treshnish Isles and adjacent small islands and mainland coasts with views toward the development area, shares an equivalent position of sensitivity. The omission of any detailed evaluation of the effects on these receptors compromises the comprehensiveness and reliability of the applicant's assessment. In light of this, the overall appraisal cannot be regarded as sufficiently robust, as it neglects the potential for significant adverse effects upon these interconnected communities and their seascape-dependent economies.

The applicant's environmental impact assessment 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.

1.1.489 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy requirements governing its determination. The applicant's own 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 653
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, pertaining to application reference numbers 00012385, seeking consent under section 36 of the Electricity Act 1989, and 00012386, requesting a marine licence pursuant to Part 4 of the Marine (Scotland) Act 2010. These applications have been submitted by MachairWind Limited, a subsidiary of ScottishPower Renewables. I request that this correspondence be acknowledged as a formal objection, that my details be recorded accordingly, and that I am kept informed of the final determination regarding these applications.

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

The following discussion outlines the grounds for objection, framed by reference to the relevant statutory and policy contexts governing the determination of these applications. It is important to emphasise that the onus lies wholly with the applicant to provide adequate evidence demonstrating that all necessary planning and environmental criteria are met. The role of objectors is not to establish contrary proof but to highlight the applicant’s failure to discharge this burden. In light of the points detailed below, it is clear that the applicant has not satisfactorily demonstrated compliance with the required tests, and therefore, the applications should be refused.

1.1.490 Seascape, Landscape and Visual Effects

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

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 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 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.

1.1.491 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 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 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 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.

1.1.492 Effects on Island Communities, Tourism and the Local Economy

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

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

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

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

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

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

The 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.

1.1.493 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, with the surrounding waters providing habitat for seabirds, marine mammals, and basking sharks. The proposed project would introduce construction, operational, and decommissioning activities into this ecologically sensitive environment on a very large scale and over several decades. Given the presence of these protected species and habitats, the potential for significant adverse environmental effects is considerable, necessitating careful assessment and mitigation measures to safeguard the ecological integrity of the site and its marine surroundings.

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

Consent for developments affecting protected habitats and species can only be granted if it is firmly established that the proposal will not adversely affect the integrity of the designated site. This requirement demands that no reasonable scientific doubt remains regarding the absence of harm, placing a heavy evidential burden on the applicant. Importantly, the presence of mitigation measures, compensation proposals, or plans for future monitoring alone does not satisfy this legal standard, as these cannot in themselves confirm compliance with the statutory tests.

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

The 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.

1.1.494 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 is unreliable because it fundamentally relies on baseline assessments that understate the effects on landscape, heritage, and socio-economic factors. As outlined in the Environmental Impact Assessment, these initial assessments fail to fully capture the extent of harm, resulting in a diminished baseline from which cumulative impacts are evaluated. Consequently, when the proposal's combined effects with existing, consented, and foreseeable developments are considered, the assessment systematically underestimates the true scale of cumulative harm. This flawed approach compromises the accuracy and robustness of the cumulative assessment, leading to an unjustifiably optimistic

conclusion about the overall impact. Therefore, the cumulative effects as presented cannot be relied upon for informed decision-making.

The applicant's submission engages with GEN 21 and paragraph 4.85 of the National Marine Plan, as well as NPF4 Policy 11(e), alongside the requirements set out by the Environmental Impact Assessment (EIA) Regulations concerning project splitting. However, it is evident that the cumulative and in-combination effects of the proposed development, including those arising from the project as a whole, have not been comprehensively demonstrated or reliably assessed within the documentation provided. This omission raises concerns about the adequacy of the environmental appraisal underpinning the proposal.

In light of these shortcomings, it is imperative that the deferred works associated with the project are explicitly considered and addressed during the determination process. Failure to do so risks overlooking significant environmental impacts and undermines compliance with pertinent planning policies and regulatory requirements. Accordingly, a thorough and transparent evaluation of all aspects of the project, including deferred elements, should be mandated to ensure a robust and policy-compliant decision-making outcome.

1.1.495 Public Engagement, Site Selection and Environmental Information

The practical consequence of the deficiencies in public participation and consultation timing is a significant undermining of the legitimacy of the site-selection process. The applicant urges the Scottish Ministers to place substantial weight on this process; however, the inadequate opportunities for meaningful engagement at both the plan and site-selection stages have persisted into the current application phase. The application itself encompasses thousands of pages of complex technical documentation, yet the consultation period coincided with the busiest months for island communities, a time when residents are fully occupied with continuous work during the visitor season and when access to specialist advice is particularly limited. This imbalance is stark, especially considering the applicant has had years of preparation supported by considerable professional and financial resources.

The National Marine Plan's guidance, specifically GEN 18, alongside the principles of effective public participation enshrined in the Aarhus Convention, establish that those affected by such decisions must have a genuine and realistic opportunity to engage. The conditions imposed on the island communities in this instance fall short of that established standard. This shortfall in meaningful engagement compromises the fairness and inclusiveness that underpin sound decision-making processes in matters of this scale and significance.

In light of these considerations, it is imperative that the Scottish Ministers give due weight to the inadequacies of the consultation process when evaluating the representations presented. Failure to adequately address these deficiencies would not only diminish public confidence in the planning system but also risk decisions being made without the full and fair input of those most directly affected. Therefore, the consultation process as it stands cannot be regarded as meeting the required standards of effective public participation.

The Environmental Impact Assessment (EIA) submitted with this application falls short of providing sufficiently robust evidence for the Scottish Ministers to make an informed decision. While the EIA is comprehensive in scope, its adequacy cannot be judged by extent alone but by the reliability and completeness of its findings. In this case, the assessment identifies potential pathways to significant environmental effects but fails to investigate these comprehensively. For example, the landscape assessment relies on a distance-based pattern of impact that is unsupported by its own stated methodology. Similarly, the heritage assessment does not convincingly apply its integrity test, and the socio-economic evaluation lacks any place-based analysis pertinent to the affected island communities. These methodological shortcomings undermine the credibility of the conclusions drawn and do not satisfy the requirement for clarity on likely significant effects prior to determination.

Furthermore, the application's dependence on future assessments, post-consent plans, ongoing monitoring, and additional approvals to address outstanding environmental concerns is insufficient to meet the statutory requirements of the EIA Regulations. The regulations mandate that all likely significant effects be fully understood and assessed before consent is granted. Relying on measures to be implemented after consent does not remove this obligation. The Scottish Ministers must base their decision on the evidence currently before them, rather than on assumptions that unresolved issues will be adequately addressed later. The applicant has not demonstrated that the environmental information submitted is adequate or complete to support a lawful and informed determination.

1.1.496 Effects on Local Area

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

The applicant's assessment of 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 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 acknowledges potential effects on designated landscapes within the Loch na Keal National Scenic Area, including Ulva and Staffa, yet these evaluations appear to underestimate or omit significant impacts, particularly on vulnerable island communities and their natural and cultural qualities. Ulva, a community-owned island within this National Scenic Area, is at an early stage of regeneration, characterised by a small, re-establishing population whose recovery is intrinsically linked to the unspoilt seascape and setting that the development threatens. Notably, no specific assessment of effects on Ulva's community or landscape qualities has been provided, leaving a critical gap in understanding the full implications.

Staffa, situated within the same National Scenic Area and renowned as one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development site. This distance exceeds the applicant's own assessment boundary, which extends to around 30 kilometres as advised by NatureScot for evaluating effects on National Scenic Area qualities. Despite recognising Staffa's panoramic maritime qualities, the applicant concludes that changes there would be small and not significant, a position that does not fully account for the island's cultural and environmental importance.

Beyond these, the Jura National Scenic Area, located approximately 28 to 32 kilometres from the development, is assessed with high sensitivity but assigned only medium to low magnitude of impact. This moderation is justified primarily by distance, apparent scale, and retention of landforms, notwithstanding that the area's designation is fundamentally based on its wild, undeveloped Atlantic outlook. Similarly, the Scarba, Lunga, and the Garvellachs National Scenic Area, at distances of approximately 35 to 40 kilometres, receive comparable treatment with limited recognition of potential adverse effects.

Collectively, these considerations indicate that the applicant's assessment does not fully capture the scale or significance of effects on wider seaboard designated landscapes and island communities. The omission of detailed evaluation for Ulva, the constrained assessment boundary excluding Staffa's full context, and the underestimation of impacts on other National Scenic Areas undermine the protection afforded to their natural and cultural qualities. Consequently, the assessment fails to provide a comprehensive understanding necessary to safeguard these sensitive landscapes and communities.

While the applicant's assessment attributes a Low magnitude of change to the South Tiree coastal area, this conclusion fails to reflect the true scale of impact on a landscape of High sensitivity at approximately 35 kilometres distance. Tiree's exceptionally low-lying topography, with its highest point, Ben Hynish, reaching only 141 metres, defines a landscape dominated by the vast expanse of sea and sky. The introduction of turbines up to 335 metres in height would create vertical elements unprecedented in this open oceanic horizon. Such significant alteration to the island's distinctive and sensitive seascape cannot reasonably be characterised as Low magnitude. This understatement leads to an unreliable evaluation of effects, overlooking the profound visual and experiential change that the proposal would impose on Tiree's unique landscape character.

The applicant's assessment fails to address 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 consistently moderates and discounts the magnitude of change for highly sensitive receptors located beyond approximately 20 kilometres. This systematic approach results in a failure to provide any place-based assessment for the communities living with those effects. Such an omission significantly undermines the integrity of the environmental impact assessment by underestimating the true extent and significance of impacts on these distant yet sensitive receptors. In conclusion, the applicant's distance-based methodology is demonstrably inadequate in capturing and addressing the full range of environmental effects beyond the 20-kilometre threshold.

1.1.497 Personal Observations

In addition to the planning matters above, I am personally concerned because: As "Father of the Kirk"(longest ordained minister of the Church of Scotland alive today), I am deeply concerned about the effect that industrialisation of the Hebridean Horizon will have not only on the livelihoods of the Islanders and the unique nature and marine wildlife but also the detrimental effect on thousands of pilgrims who find peace and solace in this holy of place. Saint Colombia brought Christianity to our British Isles via Iona and historically and culturally it is a unique annd important spiritual place for Christian's and non-Christian's alike. As Christian's we are called to be stewards of the Earth and the level of disruption this project will irreversibly cause to nature and our fellow humans is unjustifiable .
We need to protect our "thin places" more than ever for future generations and doing so we honour God's creation .

Based on my own local knowledge, I also wish to highlight that: Greater consideration needs to be given to the disastrous effects this project will have on fishing,tourism,marine wildlife and the noise and light pollution.
The islands will lose the main attraction to visitors which is the peace and tranquility. This cannot be overestimated. Anyone who has visited the Hebrides understands the

importance of these quiet,'untouched' almost magical landscapes and horizons and the contentedness and openness of the islanders.

Finally, I would also ask the Scottish Ministers to consider: I urge the Scottish ministers to differentiate between a historic and culturally important site like the Hebrides and other sites that may actually benefit from a new Wind-farm .

1.1.498 Further Comments

Renewable energy must never be produced at a cost to local communities and the environment . We need to be far more discerning with where and how we build these projects and in my mind foreign, profit -based multinational corporations are not the right organisations for the job .
Sometimes I it feels like Scotland is being sold off and for a happy,healthy,self-sufficient nation this needs to stop.
We need to think global but act local and by listening to communities and their concerns we can all work together to get this right and remain a proud and welcoming nation.

1.1.499 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 654
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.

1.1.500 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 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.

1.1.501 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 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 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 provide adequate mitigation measures to ensure the protection of internationally and nationally important heritage assets, as required under the relevant planning policies. Notably, it does not comply with the provisions of NPF4 Policy 7, specifically subparagraphs (h) relating to scheduled monuments and (c) and (d) concerning their settings, alongside GEN 6 and the guidance contained within paragraphs 4.22 to 4.23 of the National Marine Plan. These policies collectively establish a clear framework for safeguarding cultural heritage, requiring a thorough assessment and demonstration that the significance of such assets and their settings will be preserved.

Moreover, the applicant has not furnished the necessary evidence to confirm that the cultural significance of the heritage assets will be maintained. The Scottish Ministers, therefore, lack the comprehensive assessment required to form a conclusion on this matter. In the absence of such a critical evaluation, the proposal cannot be deemed compliant with the statutory policy framework intended to protect heritage assets. Consequently, the application as it stands undermines the acceptability of the development from a heritage protection standpoint.

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

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

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

1.1.503 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 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.

When considering developments affecting protected habitats and species, it is important to recognise that mitigation measures, compensation proposals, and commitments to future monitoring, while valuable, do not alone satisfy the stringent legal requirements set out under the Habitats Regulations. Unlike mitigation, which seeks to reduce adverse effects, the competent authority must be certain that the development will not adversely affect the integrity of the protected site before consent can be granted. This places a high evidential standard on applicants, requiring more than assurances of future action; it demands demonstrable proof that no reasonable scientific doubt remains regarding potential harm.

This exacting standard is embedded within a robust policy framework. The Habitats Regulations themselves, alongside provisions in GEN 9 and GEN 13 of the National Marine Plan, and Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4), collectively establish a comprehensive approach to safeguarding protected sites. These policies emphasise the need for rigorous assessment and confirmation that development proposals meet the strict derogation tests where applicable, reinforcing that consent can only be lawfully granted when such conditions are unequivocally satisfied.

Accordingly, the onus lies firmly with the applicant to provide compelling scientific evidence that the statutory tests have been met. This responsibility ensures that decision-makers do not rely solely on speculative or provisional measures but instead base consent decisions on conclusive evidence. Maintaining this high threshold is essential to uphold the integrity of protected habitats and comply with the established legal and policy requirements governing such developments.

The applicant has failed to demonstrate compliance with the statutory tests designed to safeguard internationally important habitats and species. This conclusion is drawn from a thorough examination of the submitted evidence, including the applicant's own derogation documents, which collectively reveal a lack of sufficient certainty that these legal requirements can be met. Without clear satisfaction of these tests, the

application does not fulfil the necessary legal criteria to justify consent. Consequently, in light of this demonstrable shortfall, the case for granting planning permission is fundamentally undermined and must be refused.

1.1.504 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 fails to provide a reliable evaluation of the combined effects because it relies on flawed baseline assessments, resulting in an understated starting point. Specifically, the environmental impact assessment's underlying landscape, heritage, and socio-economic evaluations have already diminished the extent of identified effects. Consequently, the cumulative assessment inherits this reduced baseline, leading to an underestimation of the total impact when considering this proposal alongside other existing, consented, and foreseeable developments. This fundamental flaw undermines the credibility of the cumulative effects conclusions and calls into question the sufficiency of the mitigation measures proposed.

There remains significant uncertainty regarding the applicant's compliance with key planning policies and environmental regulations, specifically concerning project splitting and cumulative effects. The proposal fails to demonstrate that the cumulative and in-combination effects have been comprehensively identified and assessed, in accordance with GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the requirements of the Environmental Impact Assessment Regulations. Crucially, the treatment of deferred works has not been explicitly addressed, leaving a gap in the decision-making process. It is therefore essential that the assessment of these deferred elements be clearly and explicitly considered before any determination is made.

1.1.505 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.

1.1.506 Effects on Local Area

The proposed development encompasses a substantial 448 square kilometre area immediately north-west of Islay and west of Colonsay, positioning these islands as the closest communities directly affected. Despite this proximity, the applicant's assessment notably underrepresents the impacts on Islay, treating it primarily as a potential project site rather than recognising the island's own communities whose Atlantic-facing settlements confront the nearest edge of the development. This approach omits a place-based evaluation of the effects on Islay's setting, local economy, and community life. Similarly, Colonsay and Oronsay, whose daily lives are intimately connected to their seaward outlook facing the array, face direct consequences. The North Colonsay and Western Cliffs Special Protection Area, integral to Colonsay's coastline, is central to the applicant's derogation case and compensation plan, implicitly acknowledging that harm to the internationally protected seabird populations there cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance located within this community, suffers from the same deficiencies identified elsewhere in the heritage assessment, particularly regarding the evaluation of its open maritime setting. Taken together, these omissions undermine the reliability of the environmental and heritage impact evaluation for these island communities.

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

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

Moreover, Iona's monastic landscape, which includes internationally important heritage assets such as the Abbey, the Nunnery, and the high crosses, is intrinsically linked to pilgrimage, arrival by sea, and movement through the landscape. Historic Environment Scotland requested additional visualisations from critical viewpoints, including the ferry crossing itself, yet crucial views from raised ground above St Columba's Bay at Càrn Cùl ri Èirinn remain unprovided. To illustrate the scale of the impact, the largest turbines would overtop Ben Hynish on Tiree—an established landmark visible from Iona at 33 kilometres—by approximately 194 metres, despite being located at roughly two-thirds of that distance. Taken together, these factors demonstrate that the applicant's assessment does not adequately capture the magnitude or significance of the development's effects on Iona's visual environment, community wellbeing, or heritage value.

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

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

Mull's west-facing tourism sector, including wildlife boat operations and accommodation providers in the western townships, fundamentally depends on the intactness and natural quality of the Atlantic seascape. The proposed development

would industrialise this environment, yet none of these communities has been subject to a detailed, place-specific evaluation of the consequential effects. This omission undermines confidence that the applicant has fully understood or mitigated the potential for significant adverse impacts on a vital part of Mull's economy and community identity. It is therefore essential that the assessment be revisited to incorporate comprehensive, locally grounded analysis to ensure that the unique qualities of Mull and the Ross of Mull's coastal landscapes and communities are appropriately safeguarded.

The applicant's assessment of the 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 characterises the South Tiree coastal area as having a High sensitivity at a distance of approximately 35 kilometres, while concurrently attributing a Low magnitude of change to the proposed development. This dual classification appears contradictory, given the acknowledged sensitivity of the receptor in question. The sensitivity rating recognises the intrinsic value and vulnerability of the coastal landscape, yet the Low magnitude conclusion suggests a minimal impact, a juxtaposition that warrants closer scrutiny.

Tiree's landscape is distinguished by its exceptional low-lying nature, with its defining characteristics rooted in the vast expanse of sea and sky that envelops the island. The highest elevation, Ben Hynish, reaches only 141 metres, underscoring the island's predominantly flat topography. In this context, the introduction of turbines reaching heights of up to 335 metres would represent vertical intrusions unprecedented in the seascape. Such structures would disrupt the open oceanic

horizon that is central to Tiree's distinctive character, introducing elements that are fundamentally at odds with the existing landscape fabric.

The conclusion that the magnitude of change would be Low fails to acknowledge the profound alteration these turbines would effect on the visual and experiential qualities of the island's seascape. Given the sensitivity of the receptor and the scale of the proposed development, this Low magnitude finding exemplifies a significant understatement of effects. Consequently, the evaluation provided by the applicant lacks reliability in its appraisal of the impact on Tiree's sensitive and distinctive landscape character, suggesting the need for a more rigorous and balanced assessment.

While the applicant's assessment applies 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 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.

1.1.507 Personal Observations

In addition to the planning matters above, I am personally concerned because: As a visitor to the aisle of Iona, I appreciate pristine views, the landscape and the environment. This would reduce what brings people to the island.

Based on my own local knowledge, I also wish to highlight that: Iona has been a special place for visitors for thousands of years. Any damage to the environment, the ecology the island the sea is a dominant effect to the eventual total degradation of places.

Finally, I would also ask the Scottish Ministers to consider: I direct your attention to a thorough investigation of how and what exactly will be affected before making any decisions.

1.1.508 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 655
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.

1.1.509 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 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.

1.1.510 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.

In comparing the applicant's proposed mitigation measures with the established baseline cultural significance of the heritage assets, it becomes evident that the broader experiential qualities may not be fully addressed. The baseline assessment, as recorded by the applicant, acknowledges that the cultural importance of the affected assets arises not only from their physical presence but from dynamic elements such as pilgrimage routes, arrival by sea, and movement through an active cultural landscape. This includes the interrelationships between monuments, spirituality, and the encompassing landscape and seascape, which are primarily

experienced in motion rather than from static viewpoints. Historic Environment Scotland's consultation responses, as documented within the application, further emphasise this point by requesting additional viewpoints to capture these wider experiential qualities more comprehensively. Taken together, this suggests that the applicant's assessment and subsequent mitigation strategies may inadequately represent the full scope of cultural significance, particularly the intangible, movement-based aspects of heritage experience. Therefore, it is essential that any further assessment or mitigation planning explicitly incorporates these dynamic qualities to ensure a more holistic understanding and protection of the cultural landscape.

The practical consequence of deficiencies in the landscape assessment is a corresponding undermining of the credibility of the heritage impact conclusions. As the heritage conclusions rely directly on the findings of the landscape assessment, any understatement of landscape effects necessarily transfers to the heritage analysis. This interdependence means that if landscape effects are not fully or accurately recognised, the subsequent heritage impact conclusions will similarly underestimate the true extent of harm. Therefore, the validity of the heritage conclusions is compromised by the initial shortcomings in the landscape evaluation, calling into question the robustness of the overall impact assessment.

The 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.

1.1.511 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 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 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.

1.1.512 Public Engagement, Site Selection and Environmental Information

The consultation process for this proposal has demonstrably failed to achieve the standards required for effective public participation, thereby undermining the legitimacy of the site-selection process. The applicant places significant weight on the site-selection procedure, making the quality of public engagement at that stage directly material. However, deficiencies evident during the plan and site-selection phases have persisted into the application stage. The application itself comprises

several thousand pages of technical material, yet the consultation period coincided with the busiest months for island communities, when residents are fully occupied throughout the visitor season and access to specialist advice is limited. This contrasts sharply with the applicant's extensive preparation time and substantial professional and financial resources. Moreover, GEN 18 of the National Marine Plan and the principles enshrined in the Aarhus Convention require that affected parties be afforded a realistic opportunity to participate in decisions of such magnitude. The conditions imposed on the local communities fall short of this standard, a matter that the Scottish Ministers must give due weight to when considering the representations submitted.

The 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.

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

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

The applicant's assessment fails to address significant effects on mainland and island communities that have direct visual connections to the proposed development site and whose economies are closely linked to the seascape in question. Notably, Gigha, a community-owned island emblematic of island regeneration following its purchase by local residents, faces the development waters from the east. Despite its finely balanced community and economy, no examination of the potential impacts on Gigha has been undertaken. 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 a key receptor group; however, the applicant's use of distance-based moderation effectively excludes such receptors from meaningful consideration. Furthermore, the west coast of Kintyre comprises a series of communities whose identity, character, and visitor economy are intrinsically tied to the open Atlantic seaboard facing Islay, Jura, and adjacent waters. The Treshnish Isles and other small islands and mainland coasts with sightlines toward the development area share this same position. Collectively, the omission of these communities and their seascape reliance from the assessment undermines its comprehensiveness and robustness. In conclusion, the applicant's failure to account for these receptors constitutes a significant oversight that compromises the integrity of the environmental appraisal and calls into question the adequacy of the proposed assessment methodology.

1.1.514 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 656
Dear Sir/Madam,

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

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

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

1.1.515 Legislative and Policy Framework

The application fails to demonstrate that reasonable steps have been taken to mitigate adverse effects on the natural beauty, flora, fauna, and geological or physiographical features of special interest, as required under Schedule 9 of the Electricity Act 1989. The statutory duty explicitly mandates that the applicant must have regard to these environmental and heritage interests and implement appropriate mitigation measures to address any negative impacts arising from the proposal. However, the evidence submitted does not adequately detail such mitigation efforts, nor does it provide sufficient assurance that these interests will be preserved or conserved to the extent required by law. This shortfall represents a fundamental deficiency in the application’s compliance with the statutory framework.

Furthermore, the Scottish Ministers, in determining this application, are legally obliged to have regard to the same statutory duties under Schedule 9. The absence of demonstrated compliance, coupled with identified omissions and deficiencies in addressing these duties, constitutes a clear conflict with the applicable legal and policy framework. As established by the evidence, where such compliance is not shown, these matters must weigh against the granting of consent. Consequently, the application should be refused on the grounds that it does not meet the statutory requirements to preserve natural beauty, conserve important ecological and geological features, or protect sites and objects of architectural, historic, or

archaeological interest, nor does it satisfactorily mitigate adverse effects on these protected interests.

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 mitigation requirements set out in National Planning Framework 4, particularly in relation to biodiversity and natural places. Policy 3 (Biodiversity) and Policy 4 (Natural Places) require that developments avoid harm to ecological networks and enhance natural habitats. However, the submitted evidence does not show that adequate measures have been taken to prevent adverse impacts or to provide compensatory enhancements. This shortfall is critical given the statutory duties to protect biodiversity, and the absence of demonstrated mitigation weighs heavily against the proposal.

Furthermore, the application does not meet the standards required under Policy 7 (Historic Assets and Places). The Framework mandates that developments must conserve and, where appropriate, enhance the historic environment. The evidence reveals deficiencies in the assessment of impacts on historic assets, with omissions in the evaluation of potential harm and a lack of clear proposals to address these effects. This failure to comply with the policy and associated legislative requirements undermines the acceptability of the development in terms of heritage conservation.

Finally, the proposal does not satisfy the criteria of Policy 11 (Energy), which seeks to ensure that energy considerations are integrated into planning decisions in a manner consistent with national objectives. The application lacks sufficient evidence to demonstrate that energy impacts have been properly assessed or that the development aligns with the Framework's energy policies. Given these unresolved conflicts with the applicable legal and policy framework, the proposal cannot be considered compliant. In accordance with the guidance that where compliance has not been demonstrated, these matters weigh against granting consent, the application should be refused.

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 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 meet the fundamental responsibility of demonstrating compliance with all relevant legal and policy requirements through robust, objective, and proportionate evidence. This evidential burden is essential to ensure that every statutory duty, planning policy, and environmental assessment obligation is fully satisfied. In this case, the applicant's submissions do not provide the necessary assurance that these critical criteria have been met.

Furthermore, the evidence presented reveals clear deficiencies and omissions in addressing the applicable legal and policy framework. These shortcomings undermine confidence in the proposal's conformity with statutory and planning obligations. Where such compliance is not demonstrated, the weight of planning judgment must be directed against the granting of consent, as the statutory and policy frameworks are designed to safeguard public and environmental interests.

In conclusion, the absence of adequate evidence to prove full compliance with all legal and policy requirements constitutes a significant and determinative failing. This failure alone justifies refusal of the application, as it conflicts with the established principles that govern the planning process and the statutory duties incumbent upon the applicant. Consent should therefore be withheld.

1.1.516 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to satisfy the impact criteria outlined in NPF4 Policy 11, thereby undermining the policy's intended support for renewable energy development. Specifically, Policy 11 sets out clear requirements under subsections (c), (d), and (e) regarding the protection of communities, landscapes, seascapes, and other important receptors. The evidence demonstrates that the development would result in significant adverse effects on nationally designated landscapes and seascapes. Moreover, it has not been convincingly shown that the cultural significance of scheduled monuments and their settings would be preserved, nor that the interests and wellbeing of island communities would be adequately safeguarded. Additionally, the ecological assessments provided fail to meet the necessary tests required by the policy.

This lack of compliance with the stated impact criteria is fundamental and cannot be overlooked. NPF4 Policy 11's support for renewable energy is explicitly conditional upon these impacts being appropriately managed and mitigated. Since the proposal does not meet these essential conditions—failing to protect valued landscapes, cultural heritage, community interests, and ecological integrity—it conflicts directly with the policy's provisions. Consequently, the proposal should not be afforded the policy's presumption in favour, as doing so would set a precedent contrary to the careful balance sought by national planning policy.

The practical consequence of the proposal as submitted is that it would result in significant adverse effects on nationally important designated assets, undermining the protective aims of several key policies within NPF4. Specifically, the proposal would adversely impact National Scenic Areas and other nationally important landscapes, thereby failing to safeguard the qualities for which these areas have been designated. This outcome is at odds with the requirements of Policy 11 and its associated provisions, notably Policies 4(c) and 4(d), which collectively seek to prevent significant harm to such valued landscapes.

Moreover, the proposal does not adequately demonstrate how the cultural significance of scheduled monuments and their settings would be preserved. Policy 7, including its provisions under 7(h) concerning scheduled monuments and 7(c) and 7(d) relating to the setting of historic assets, demands robust protection of heritage interests. The evidence presented falls short of meeting these standards, raising

concerns that the proposal would detrimentally affect the integrity and context of these nationally important heritage assets. This failure represents a clear conflict with the established policy framework aimed at conserving the historic environment.

In addition, the proposal does not satisfy the ecological requirements set out in Policy 3 on biodiversity, nor does it provide sufficient assurance that island communities, which are recognised as sensitive receptors, would be safeguarded. Taken together, these shortcomings demonstrate that the proposal is incompatible with multiple policies within NPF4 designed to protect designated landscapes, heritage assets, and biodiversity. As such, the proposal should not be supported in its current form given the significant and demonstrable conflicts with these critical national policy objectives.

The applicant's evidence confirms that, in relation to land-based effects, the proposal conflicts with the terrestrial development plan framework, including the Argyll and Bute Local Development Plan 2. Specifically, it is acknowledged that the development would adversely affect landscape character, heritage assets, and community interests that these policies are designed to protect. This recognition underscores the fundamental incompatibility of the proposal with the objectives and safeguards established within the local development plan.

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

1.1.517 Seascape, Landscape and Visual Effects

There is considerable uncertainty surrounding the reliability of the applicant's assessment methodology, particularly in relation to the treatment of distance thresholds and their influence on predicted effects. Notably, the applicant's written methodology in Appendix 16.1 does not specify any distance beyond which major effects are considered to cease. However, an independently prepared Evidence Note, based entirely on the applicant's Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern across all three assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of the receptor's sensitivity or the extent of visibility.

Furthermore, the applicant's own documentation demonstrates that distance plays a significant role in shaping these judgements. For example, the assessment of a coastal area situated over 30 kilometres away concludes that, given the viewing distance, the scale of change is small. Similarly, the Landscape Character synthesis categorises magnitude of change as High within approximately 20 kilometres, Medium between approximately 20 and 30 kilometres, and Low beyond approximately 30 kilometres for certain landscape types. This gradation based on distance appears to systematically moderate the magnitude of effect as distance increases.

The consequence of this approach is that the protective tests are being applied to understated inputs. By moderating magnitude at the very distances where some of the most sensitive designated landscapes are situated, the conclusions reached fail to provide a reliable representation of the effects the Scottish Ministers are being asked to consent. This fundamental uncertainty in the assessment methodology undermines confidence in the accuracy and robustness of the predicted impacts on sensitive receptors.

In considering the visual impact of the proposed development, it is important to acknowledge the limitations of the mitigation measures as they are represented through the submitted visualisation materials. While the applicant has adhered to NatureScot's visualisation guidance, which is a recognised standard, these materials inherently lack the capacity to fully convey the true scale and effect of the development as experienced in situ. This shortcoming is significant when assessing the effectiveness of any proposed mitigation designed to lessen visual intrusion.

NatureScot's guidance explicitly notes that printed visualisations are unable to replicate the scale a viewer perceives in the field. This limitation extends to wireline drawings, which are included within the same panoramic projections and are intended to supplement the photographic images. However, these wireline drawings are themselves technical renderings embedded within the visualisation framework and do not serve as an independent means to correct or enhance the viewer's understanding beyond the constraints of the accompanying photographs. Therefore, reliance on these materials may understate the actual visual impact and the degree to which mitigation measures can be expected to succeed.

Given these inherent constraints, it is prudent to approach the visual assessment with caution and to consider the possibility that the visual effects might be more pronounced than the submitted materials suggest. This underscores the necessity for comprehensive on-site evaluations and a robust consideration of alternative or additional mitigation strategies to address any residual visual effects that may not be fully captured in the visualisation evidence.

While mitigation measures 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 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.

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

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

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

The applicant's heritage conclusions are fundamentally reliant on the findings of the landscape assessment. This dependency is critical, as the landscape assessment forms the evidential foundation upon which the heritage impact conclusions are constructed. Any shortcomings or inaccuracies within the landscape evaluation inevitably influence the validity of the heritage assessment.

It has been demonstrated that the landscape effects have been understated, as outlined in the preceding analysis. This understatement is not a trivial matter; rather, it represents a significant deficiency that affects the overall appraisal. Because the heritage conclusions are predicated on the landscape assessment, any minimisation of landscape impacts is directly transmitted into the heritage impact findings, thereby diminishing their reliability.

Consequently, the credibility of the heritage conclusions is compromised by the inherent weaknesses within the landscape assessment. A more robust and accurate landscape evaluation is essential to ensure that the heritage impacts are properly understood and fairly assessed. Without addressing these deficiencies, reliance on the current heritage conclusions remains questionable and potentially misleading.

The 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.

1.1.519 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 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.

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.

1.1.520 Ecology, Biodiversity and Habitats Regulations

The development site encompasses Priority Marine Features and Annex I habitats directly within its boundaries, while the adjacent waters serve as habitat for seabirds, marine mammals, and basking sharks. The proposed project would introduce extensive construction, operational, and decommissioning activities into this ecologically sensitive environment over a period of several decades, representing a substantial and prolonged disturbance.

Given the presence of these designated habitats and protected species, the scale and duration of the development's impact warrant thorough consideration. The potential for significant adverse environmental effects arises from the disturbance, habitat loss, and cumulative pressures associated with the proposed activities. This underscores the need for rigorous assessment and mitigation to address the ecological importance and vulnerability of the site and its surrounding marine environment.

The practical consequence of the applicant's submission is that potential adverse impacts on the North Colonsay and Western Cliffs Special Protection Area have been acknowledged and addressed through specific derogation and compensation documents. These include a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan, both directed at protecting the guillemot population within the designated site.

Such documents are customarily prepared when an adverse effect on the integrity of a protected site cannot be definitively ruled out. Their inclusion in the application signals the applicant's recognition that the proposed development may have significant environmental consequences requiring formal mitigation measures under derogation provisions. This approach demonstrates an awareness of the statutory responsibilities involved in safeguarding protected sites.

However, it is important to note that the submission of these documents does not guarantee agreement on the absence of harm. According to the applicant's own position, the Scottish Ministers may reach a different conclusion regarding the potential for adverse effects. This uncertainty underscores the need for careful scrutiny of the evidence and the adequacy of proposed compensation measures before any determination is made.

The 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 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.

1.1.521 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 assessments rely fundamentally on the findings of the underlying Environmental Impact Assessment. As noted in the submitted evidence, where the baseline evaluations for landscape, heritage, and socio-economic factors understate the extent of effects, the cumulative assessment consequently adopts

this diminished baseline. This approach results in an understatement of the combined impacts when considering this proposal alongside other existing, consented, and foreseeable developments. Therefore, the reliability of the cumulative impact assessment is compromised, leading to an overall underestimation of the true scale of combined effects.

The applicant has failed to demonstrate that the cumulative and in-combination effects of the proposal, including the full scope of the project, have been reliably identified and assessed. 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.

1.1.522 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 submitted with this application fails to provide sufficiently robust evidence to enable the Scottish Ministers to make a fully

informed decision. While the assessment identifies potential pathways to significant environmental effects across various topics, it does not investigate these impacts comprehensively. For instance, the landscape assessment draws conclusions based on a distance pattern that is not supported by its own stated methodology. Similarly, the heritage assessment lacks demonstration of the application of its prescribed integrity test, and the socio-economic assessment omits a detailed, place-based analysis of the affected islands. These shortcomings collectively undermine the reliability of the environmental information presented.

Furthermore, the application frequently defers critical aspects of its assessment to future stages, including post-consent plans, ongoing monitoring, and additional approvals. However, such reliance does not satisfy the requirements set out in the Environmental Impact Assessment Regulations, which mandate that likely significant effects must be fully understood prior to determination. The practice of postponing essential evaluations to a later date is inconsistent with the statutory framework intended to ensure comprehensive environmental consideration at the decision-making stage.

In conclusion, the Scottish Ministers are obliged to base their determination on the evidence currently before them, rather than on assumptions that unresolved matters will be adequately addressed in the future. Given the deficiencies identified, the applicant has not demonstrated that the environmental information submitted meets the necessary adequacy standards. It is therefore inappropriate to grant consent on the basis of the existing assessment, and the application should not be approved in its present form.

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

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

communities, particularly where the character and quality of views contribute substantially to the local environment and visitor experience.

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

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

The applicant’s assessment 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.

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.

1.1.524 Personal Observations

In addition to the planning matters above, I am personally concerned because: To change the visual beauty of the area, which has been unchanged for thousands if not hundreds of thousands of years is unconscionable.

1.1.525 Summary

The proposal for the MachairWind Offshore Wind Farm fails to demonstrate compliance with the relevant statutory and policy frameworks governing its determination. The applicant's own assessment acknowledges significant impacts on nationally designated landscapes as well as on the heritage and communities along this coastal area. However, published analyses of the applicant's documentation reveal that the magnitude of these impacts has been understated. Crucially, the necessary heritage assessment has not been undertaken, and while the effects on the island communities affected by the project were identified, they have never been thoroughly evaluated. Furthermore, the ecological requirements have not been proven to be achievable. It is also important to note that only a portion of the overall project is currently before the Scottish Ministers for consideration.

In light of these deficiencies, it is respectfully urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm and decline the associated marine licence. Should the Ministers decide against refusal, it is requested that the applicant be required to provide further environmental information and enhanced visualisations. Additionally, the application should only be determined following a public inquiry, enabling a comprehensive examination of the concerns outlined in this objection. Regardless of the ultimate decision, it is also sought that the Ministers explicitly address and provide clear conclusions on the impacts upon cultural heritage and the affected island communities within their formal reasons.

Yours faithfully,

[Redacted]

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

Member of the public 657
Dear Sir/Madam,

I hereby submit a formal objection to the applications numbered 00012385 and 00012386, which seek consent respectively under section 36 of the Electricity Act 1989 and for a marine licence under Part 4 of the Marine (Scotland) Act 2010, both submitted by MachairWind Limited (ScottishPower Renewables) for the development of the MachairWind Offshore Wind Farm. I request that this objection be officially recorded, that I be acknowledged as an objector, and that I receive notification of the final determination regarding these applications.

The proposals under consideration involve an offshore wind farm with an installed capacity of approximately 2 gigawatts, comprising between 91 and 144 turbines. Each turbine may reach a maximum blade tip height of up to 335 metres. The project lies within a designated Windfarm Development Area encompassing roughly 448 square kilometres of marine environment located to the north-west of Islay and west of Colonsay. This site is situated approximately 21 kilometres from Iona and is in close proximity to various islands and coastal communities within the southern Hebrides.

My objection is founded upon detailed planning and environmental grounds, each addressed in the context of 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 provide comprehensive and robust evidence that all relevant statutory tests and policy criteria are met. Objectors bear no obligation to establish the contrary. Upon careful examination of the submitted material, it is clear that the applicant has failed to satisfy this burden. Consequently, I contend that the applications should be refused consent.

1.1.526 Legislative and Policy Framework

The marine licence application under consideration raises significant uncertainty regarding its compliance with the statutory requirements set out in Part 4 of the Marine (Scotland) Act 2010. This legislation mandates that authorisation decisions must be made in accordance with Scotland’s National Marine Plan unless relevant considerations indicate otherwise. The application’s conformity with this overarching legal framework is therefore a fundamental prerequisite for its lawful determination.

A detailed examination of the application against the National Marine Plan’s General Policies reveals notable deficiencies. The policies of particular relevance include GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts). The application fails to demonstrate compliance with these policies adequately, leaving critical aspects of the statutory assessment incomplete or unsupported by robust evidence.

Given these unresolved issues, the application does not meet the necessary legal and policy standards required for consent. Where compliance has not been demonstrated, or where evidence reveals deficiencies, omissions, or conflicts with

the applicable legal and policy framework, these shortcomings must weigh decisively against the granting of the marine licence. Accordingly, the application should be refused on the grounds that it fails to satisfy the statutory criteria established by the Marine (Scotland) Act 2010 and the National Marine Plan.

The proposal fails to meet the fundamental requirements set out in the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations, which mandate that the likely significant environmental effects must be fully identified, assessed, and reported prior to any determination. This statutory obligation ensures that decision-makers have a comprehensive understanding of the environmental consequences before consent is granted. The absence of a complete and robust environmental impact assessment undermines this process and contravenes the established legal framework.

Furthermore, the proposal does not comply with the Habitats Regulations, which require a thorough assessment of the effects on European protected sites in accordance with the relevant statutory tests. This assessment is critical to safeguard protected habitats and species from potential adverse impacts. The failure to demonstrate compliance with these regulations represents a serious procedural and substantive deficiency. Without clear evidence that the proposal will not harm protected sites, the statutory protections afforded by the Habitats Regulations are effectively disregarded.

Given these significant shortcomings—the incomplete environmental impact assessment and the failure to satisfy the Habitats Regulations' requirements—the proposal conflicts with the applicable legal and policy framework. Where such compliance has not been demonstrated, the law is explicit that these matters must weigh against the granting of consent. Accordingly, the proposal should be refused on the grounds of inadequate environmental and habitats assessment.

There is significant uncertainty as to whether the proposal has adequately considered and given due weight to the interests of island communities, as mandated by the Islands (Scotland) Act 2018. The evidence does not demonstrate compliance with this statutory requirement, leaving a critical gap in the decision-making process. This failure to properly address the specific needs and circumstances of island communities undermines the legal and policy framework established to protect their interests.

Furthermore, the absence of clear evidence confirming that the proposal aligns with the obligations under the Islands (Scotland) Act 2018 constitutes a material deficiency. Where such compliance is not demonstrated, or where omissions and conflicts with the applicable legal and policy framework are identified, these factors must weigh decisively against the granting of consent. On this basis, the proposal should be refused.

1.1.527 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.

1.1.528 Seascape, Landscape and Visual Effects

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

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

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

Moreover, the absence of demonstrated compliance with these important policies indicates a fundamental shortcoming in the application. Without clear evidence that the proposal meets the criteria set out for protecting nationally important landscapes

and seascapes, the planning authority cannot reasonably be expected to grant consent. In light of this, the proposal should be refused to uphold the integrity of the planning system and to ensure that landscape and seascape interests are adequately protected.

1.1.529 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 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.

1.1.530 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development rely heavily on visitors, who are drawn specifically by the qualities identified in the applicant's own baseline assessments: landscape, seascape, cultural heritage, tranquillity, and remoteness. These attributes are not merely incidental; they constitute the core appeal that sustains the visitor economy upon which these communities depend to an exceptional degree.

Any alterations to these fundamental qualities would therefore have a direct and detrimental impact on the economic foundation of the island communities. Such an impact would extend beyond economics, threatening local services, population stability, and ultimately the long-term viability of these communities. The proposal, by undermining the very characteristics that attract visitors, poses a significant risk to the social and economic sustainability of the islands.

1.1.531 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.

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.

1.1.532 Personal Observations

In addition to the planning matters above, I am personally concerned because: This will negatively effect the tourism, cultural heritage, and ecology of an important and one-of-a-kind island.

1.1.533 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy obligations governing its determination. The applicant’s own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the local communities and heritage of the coastal area. However, independent scrutiny of the submitted documents reveals that these impacts have been understated, with a critical heritage assessment conspicuously absent. Furthermore, while the effects on the island communities affected by the development were acknowledged, no comprehensive assessment of these impacts has been undertaken. In addition, the ecological tests required by policy have not been demonstrated as achievable. It is also pertinent to note that the application before the Scottish Ministers pertains only to a portion of the overall project.

Given these substantial shortcomings, it is urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm and reject the related marine licence application. Should the Ministers consider otherwise, it is requested that the applicant be required to provide further environmental information alongside enhanced visualisations. Moreover, any decision should be deferred until after a public inquiry, affording a thorough examination of the concerns raised in this objection. Regardless of the outcome, it is further requested that the Ministers issue explicit conclusions within their decision statement concerning the project's effects on cultural heritage and on the impacted island communities.

Yours faithfully,

[Redacted]

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

Member of the public 658
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, which are the subject of application numbers 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. I request that this letter be recorded as an official objection, that my details be registered accordingly, and that I be kept informed of the outcome of these applications.

The project in question seeks approval for an offshore wind installation with a capacity of approximately 2 gigawatts. It would comprise between 91 and 144 turbines, each reaching a maximum height of up to 335 metres to blade tip. The proposed site lies within a designated Windfarm Development Area extending over roughly 448 square kilometres of marine environment, located to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona. This location is in close proximity to the islands and coastal settlements of the southern Hebrides.

The following sections articulate the grounds for objection, grounded in the relevant statutory and policy contexts that govern the determination of such applications. It is important to emphasise that the onus lies firmly with the applicant to demonstrate, through adequate and compelling evidence, that all applicable statutory tests and policy requirements are met. Those opposing the development are not required to prove any contrary position. In this instance, the applicant has failed to satisfy the necessary evidential standards, and for the reasons detailed below, the applications should be refused consent.

1.1.534 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. 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 adequately addressed.

Given that the Scottish Ministers are also required to have regard to these statutory duties in determining the application, the identified deficiencies and omissions in the applicant’s submission represent a failure to meet the applicable legal and policy framework. Where such compliance has not been demonstrated, these shortcomings weigh against the granting of consent. Therefore, the application should be refused on the basis that it does not satisfy the statutory obligations under Schedule 9 of the Electricity Act 1989.

The marine licence application fails to demonstrate compliance with the statutory requirements of the Marine (Scotland) Act 2010 and the relevant policies of Scotland’s National Marine Plan, thereby warranting refusal. Under Part 4 of the Marine (Scotland) Act 2010, authorisation decisions must be taken in accordance

with the National Marine Plan unless relevant considerations indicate otherwise. The application must therefore satisfy the General Policies including GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts).

The submitted application does not provide adequate evidence to confirm compliance with these policies. There are identifiable deficiencies and omissions in the assessment of impacts on the historic environment and natural heritage, as required under GEN 6 and GEN 9. The application also lacks sufficient engagement records as mandated by GEN 18, and fails to present sound evidence in accordance with GEN 19. Furthermore, cumulative impacts have not been properly addressed in line with GEN 21. These shortcomings constitute conflicts with the applicable legal and policy framework.

Given that compliance with the National Marine Plan policies forms a statutory part of the assessment, and the application has not demonstrated such compliance, these failures weigh decisively against the granting of consent. The marine licence application should therefore be refused.

The applicant’s submission acknowledges that National Planning Framework 4 (NPF4) is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. The proposal engages several key policies within NPF4, specifically Policy 3 concerning Biodiversity, Policy 4 relating to Natural Places, Policy 7 addressing Historic Assets and Places, and Policy 11 on Energy. These policies establish clear expectations for the protection and enhancement of biodiversity, the safeguarding of natural environments, the conservation of historic assets, and the responsible use of energy resources within development proposals.

However, the evidence presented fails to demonstrate compliance with these critical policies. There are identifiable deficiencies and omissions in the applicant’s documentation that undermine the ability to confirm adherence to the biodiversity and natural places requirements set out in Policies 3 and 4. Similarly, the proposal does not adequately address the protection and management of historic assets as required by Policy 7, nor does it provide sufficient evidence to satisfy the energy considerations mandated by Policy 11. These shortcomings represent clear conflicts with the applicable legal and policy framework established by NPF4.

Given that compliance with these policies has not been demonstrated, and in light of the identified deficiencies and omissions, these matters weigh decisively against the granting of planning consent. The failure to meet the statutory and policy requirements of NPF4 in relation to biodiversity, natural places, historic assets, and energy is a material planning consideration that must be afforded significant weight in the determination of this application. Consequently, the proposal should be refused on the basis that it conflicts with the fundamental provisions of the National Planning Framework 4.

The applicant's submission fails to comply with the requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which mandate that the likely significant environmental effects of the proposal must be identified, assessed, and reported prior to any determination. The evidence provided does not demonstrate that a comprehensive environmental impact assessment has been undertaken in accordance with these statutory obligations. This omission represents a fundamental procedural defect, as the necessary identification and evaluation of significant environmental effects is a prerequisite for lawful decision-making under the regulations.

Furthermore, the applicant has not fulfilled the obligations imposed by the Habitats Regulations, which require that the effects of the proposal on European protected sites be assessed in accordance with the applicable statutory tests. The absence of a proper habitats regulations assessment means that compliance with these legal requirements has not been demonstrated. Given these deficiencies and omissions, the proposal conflicts with the applicable legal and policy framework. As established by the evidence, such failures weigh decisively against the granting of consent for the development.

The proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018. This statutory requirement obliges decision-makers to explicitly account for the unique circumstances and needs of island communities during the planning process. The submitted documentation does not demonstrate compliance with this duty, nor does it provide adequate evidence that the interests of island communities have been sufficiently identified, assessed, or integrated into the decision-making framework. Such deficiencies constitute a clear omission and conflict with the applicable legal and policy framework. In accordance with the established principle that where compliance with the Islands (Scotland) Act 2018 is not demonstrated, or where evidence reveals shortcomings or legal conflicts, these factors must weigh against the granting of consent. Therefore, on the basis of the failure to properly consider and give due weight to island communities' interests as required by the Islands (Scotland) Act 2018, the application should be refused.

The applicant has failed to meet the fundamental responsibility to demonstrate compliance with all relevant legal and policy requirements through robust, objective, and proportionate evidence. This failure is critical because the evidential burden lies squarely with the applicant to prove that every statutory duty, planning policy, and environmental assessment requirement has been satisfied. The absence of such demonstration undermines the legitimacy of the application and precludes a lawful grant of consent.

Detailed examination of the submitted evidence reveals that compliance has not been established. The applicant's documentation contains deficiencies and omissions that directly conflict with the applicable legal and policy framework. These shortcomings have not been addressed or remedied, leaving significant uncertainty as to whether statutory and policy obligations are met. According to established principles, where compliance is not demonstrated or where evidence identifies

conflicts with the legal and policy framework, these factors must weigh decisively against the granting of planning permission.

In conclusion, the applicant's failure to discharge the evidential burden required to prove compliance with all relevant statutory duties and planning policies constitutes a fundamental flaw in the application. This deficiency alone justifies refusal of consent in accordance with the governing legal and policy framework.

1.1.535 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 NPF4 Policy 11, which governs support for renewable energy development. Although Policy 11 endorses such development, this support is conditional and operates strictly within the framework of its specified impact tests, notably those set out in Policy 11(c) concerning effects on communities, and Policies 11(d) and 11(e) relating to impacts on landscape, seascape, and other receptors. A detailed examination reveals that the proposal fails to satisfy these criteria. It would inflict significant adverse effects upon nationally designated landscapes and seascapes, a matter that weighs heavily against compliance. Furthermore, there is an absence of convincing evidence demonstrating that the cultural significance of scheduled monuments and their settings would be adequately preserved. Equally, the proposal does not convincingly ensure the safeguarding of island communities as required. Lastly, the ecological assessments provided lack the necessary clarity and robustness to confirm that the relevant ecological tests can be met. Taken together, these unresolved issues indicate a clear conflict with the policies encapsulated in NPF4 Policy 11, undermining the proposal's claim to policy support for renewable energy development.

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 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.

1.1.536 Seascape, Landscape and Visual Effects

The applicant's written methodology, as set out in Appendix 16.1, does not specify any distance threshold beyond which major effects are deemed to cease. Nevertheless, an independently prepared Evidence Note, relying entirely on the applicant's Chapter 16 and Appendices 16.1 to 16.3, identifies a clear and consistent pattern across all three assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of its sensitivity or the extent of visibility. This finding is corroborated by the applicant's own documentation, which explicitly acknowledges the influence of distance on judgements of effect magnitude. For example, the assessment of a coastal area situated over 30 kilometres away concludes that, due to the viewing distance, the scale of change is small. Furthermore, the Landscape Character synthesis categorises magnitude as High within roughly 20 kilometres, Medium between about 20 and 30 kilometres, and Low beyond approximately 30 kilometres for certain landscape types. The practical consequence of this approach is that protective assessments rely on systematically moderated magnitude inputs at distances where some of the most sensitive designated landscapes are situated. As a result, the conclusions drawn from these assessments do not reliably represent the true effects that Scottish Ministers are being asked to consider and consent to.

The practical consequence of relying on the visualisation materials submitted in support of the assessment is that they may not accurately convey the true scale of the development as experienced on site. NatureScot's visualisation guidance, which the applicant follows, explicitly recognises that printed visualisations cannot fully replicate the scale perceived by a viewer in the field. This inherent limitation means that any conclusions drawn solely from these materials should be treated with caution, as they risk understating or misrepresenting the visual impact.

Moreover, the wireline drawings included within the same panoramic projections do not overcome these deficiencies. Rather than serving as an independent means to correct or clarify the photographic visualisations, they are technical renderings subject to the same constraints. As such, they should be understood as part of the overall visualisation package, sharing its limitations, rather than as a definitive or corrective representation of the development's visual effects. This understanding is important for a balanced appraisal of the visual evidence presented.

The proposed development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, resulting in a permanent alteration of the night-time seascape character throughout the 35-year operational period. This change would be immediately perceptible and represent a significant departure from the existing natural darkness of the area.

Moreover, the 35-year operational lifespan does not mitigate the extent of harm under planning policy. Granting consent for this development effectively establishes that the seascape is deemed appropriate for wind farm use, setting a precedent that could influence future decisions and expectations regarding this environment.

Therefore, careful consideration must be given to the implications of altering the night-time seascape, not only in terms of immediate visual impact but also regarding the broader policy message such consent conveys about the suitability of this seascape for industrial development.

There remains significant uncertainty regarding the 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.

1.1.537 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 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 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 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.

1.1.538 Effects on Island Communities, Tourism and the Local Economy

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

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

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

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

The proposal fails to comply with 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.

1.1.539 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 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 practical consequence of the stringent legal framework under the Habitats Regulations is that consent for any development potentially affecting protected habitats or species can only be granted if there is absolute certainty that the integrity of the designated site will not be compromised. This high evidential standard means that consent must be refused unless no reasonable scientific doubt remains regarding adverse effects. Importantly, the onus is on the applicant to provide robust evidence to demonstrate compliance with these requirements. Reliance solely on mitigation measures, compensation proposals, or future monitoring cannot, in isolation, satisfy the statutory tests necessary for lawful consent.

This rigorous approach is firmly embedded within the wider policy context, engaging not only the Habitats Regulations but also GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of NPF4. Together, these provisions reinforce the necessity for a precautionary and evidence-led approach when assessing development proposals affecting protected sites. Consequently, planning decisions must give full effect to these overlapping statutory and policy safeguards, ensuring that environmental protection remains paramount and that consent is only granted where all legal and policy criteria are unequivocally met.

The 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.

1.1.540 Cumulative and In-Combination Effects

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

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

the current process effectively circumvents comprehensive scrutiny, undermining the integrity of the decision-making framework.

In light of these concerns, it is essential that the assessment be reconsidered to ensure that all integral elements of the project are examined collectively. Only through such an approach can the Scottish Ministers properly evaluate the full environmental and planning implications, thereby upholding both legal requirements and sound planning practice.

The practical consequence of relying on the current cumulative impact assessment is that it significantly underestimates the true combined effects of the proposed development alongside existing, consented, and foreseeable projects. This underestimation arises because the assessment is founded on baseline conclusions that themselves understate the impacts on landscape, heritage, and socio-economic factors. Consequently, decision-makers may be misled about the scale and severity of the cumulative impacts when considering the overall acceptability of the proposal.

This issue stems directly from the methodology employed in the Environmental Impact Assessment, where the baseline assessments for key receptors are flawed. As these initial evaluations set the foundation for the cumulative impact assessment, any understatement at this stage propagates through subsequent analyses. The result is a diminished perception of the combined effects, which fails to capture the full extent of the potential harm when the proposal is considered in context with other developments in the area.

Given these concerns, it is essential that the cumulative effects are reassessed using more accurate and robust baseline data to ensure a reliable understanding of the overall impact. Until such improvements are made, the current assessment cannot be regarded as a sound basis for planning decisions, and the cumulative impacts of the proposal remain inadequately addressed.

The applicant’s submission fails to 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.

1.1.541 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 deficiencies identified in the Environmental Impact Assessment (EIA) is that the Scottish Ministers lack sufficient evidence to make an informed decision on the application. The assessment does not adequately address all pathways to significant effects, relying instead on incomplete investigations and methodologies that fail to support its conclusions. For example, the landscape assessment produces outcomes based on a distance pattern not substantiated by its own methodology; the heritage assessment does not apply its stated integrity test; and the socio-economic assessment neglects a place-based analysis of the affected islands.

Moreover, the application depends in part on future assessments, post-consent plans, monitoring, and additional approvals to address outstanding environmental concerns. However, this reliance does not comply with the requirements of the EIA Regulations, which mandate that likely significant effects must be thoroughly understood prior to determination. The deferral of critical information compromises the regulatory process and undermines the assurance that potential environmental impacts have been fully considered at the decision-making stage.

It follows that the Scottish Ministers are bound to determine the application based solely on the evidence currently before them, without presuming that unresolved matters will be satisfactorily addressed later. Given the inadequacies in the environmental information submitted, the applicant has not demonstrated that the EIA is sufficient to meet this standard. Consequently, the application should not be approved in its present form.

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

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

Similarly, the Jura National Scenic Area, designated for its wild and undeveloped Atlantic outlook, is assessed as having High sensitivity at distances of approximately 28 to 32 kilometres. The applicant attributes only a Medium to Low magnitude of effect, justifying this moderation by distance, apparent scale, and the retention of landforms. The Scarba, Lunga and the Garvellachs National Scenic Area, situated roughly 35 to 40 kilometres from the development, is treated in a comparable manner.

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

The applicant's assessment 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 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 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.

1.1.543 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 adverse impacts upon nationally designated landscapes, as well as the heritage and communities of the coastal area. However, independent scrutiny of the submitted documentation reveals that these impacts have been consistently underestimated. Furthermore, the necessary heritage assessment has not been undertaken in accordance with statutory obligations. The ecological criteria set out in the applicable regulatory framework remain unmet, as no convincing demonstration has been provided that these tests can be satisfied. Of particular concern is the absence of any assessment of the effects on the island communities affected by the proposal, despite their identification in the application materials. Additionally, it should be noted that only a portion of the entire project has been submitted for consideration by the Scottish Ministers.

In light of these substantial deficiencies, it is respectfully urged that Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm application, and also decline to grant the associated marine licence. Should the Ministers determine not to refuse outright, it is requested that they require the submission of further environmental information alongside enhanced visualisations to allow for a more comprehensive appraisal. It is further recommended that the decision be deferred pending a public inquiry, thereby enabling a full and rigorous examination of the issues raised in this objection. Regardless of the outcome, it is essential that the Ministers explicitly address and record their conclusions on the proposal's effects on cultural heritage and the impacted island communities within their formal 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 659
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 under Part 4 of the Marine (Scotland) Act 2010, both submitted by MachairWind Limited (ScottishPower Renewables). I request that my objection be officially recorded, that I be recognised as an objector, and that I receive notification of the decisions reached on these applications.

The proposals concern the construction of an offshore wind farm with a generating capacity of approximately 2 gigawatts. The development would involve installing between 91 and 144 turbines, each reaching up to 335 metres to blade tip. This extensive infrastructure would occupy a Windfarm Development Area encompassing around 448 square kilometres of marine environment located north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in close proximity to the islands and coastal settlements of the southern Hebrides.

My objection is grounded in both planning and environmental considerations, which I will elaborate upon in the subsequent sections in direct relation to the statutory and policy framework applicable to these proposals. It is important to emphasise that the onus lies firmly with the applicant to provide sufficient, robust evidence demonstrating that all relevant statutory tests and policy requirements are met. Objectors bear no obligation to disprove the application. Having examined the information provided, I conclude that the applicant has failed to meet this evidential burden. Consequently, I contend that consent should be withheld.

1.1.544 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989. Schedule 9 mandates that the applicant must have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant is required to take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The Scottish Ministers, in determining the application, are similarly bound to have regard to these statutory duties. The evidence before the authority identifies deficiencies and omissions in the applicant’s submission with respect to these requirements. Where such compliance has not been demonstrated, or where conflicts with the applicable legal and policy framework exist, these matters weigh decisively against the granting of consent.

The marine licence application under consideration fails to comply with the statutory requirements set out in Part 4 of the Marine (Scotland) Act 2010 and does not demonstrate adherence to the relevant policies of Scotland’s National Marine Plan. As a result, the application should not be granted consent.

Under the Marine (Scotland) Act 2010, all marine licence authorisation decisions must be taken in accordance with the National Marine Plan unless relevant

considerations indicate otherwise. The application must therefore be assessed against the General Policies of the 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).

The evidence before the determining authority does not demonstrate compliance with these policies. There are deficiencies and omissions in the application's assessment of impacts on the historic environment, landscape and national scenic areas, and natural heritage. Furthermore, the application fails to provide sound evidence as required by GEN 19 and paragraph 4.81, and does not adequately address cumulative impacts as mandated by GEN 21 and paragraph 4.85. The engagement processes outlined in GEN 18 have not been satisfactorily fulfilled, undermining the robustness of the application's consultation and evidence base.

Given these shortcomings, the application conflicts with the applicable legal and policy framework. The Marine (Scotland) Act 2010 and the National Marine Plan impose a clear statutory duty to refuse consent where compliance is not demonstrated or where evidence reveals deficiencies or conflicts. This application falls squarely within that category.

In conclusion, the marine licence application does not meet the statutory requirements of the Marine (Scotland) Act 2010 nor the relevant policies of Scotland's National Marine Plan. The identified deficiencies, omissions, and conflicts weigh decisively against the granting of consent. Accordingly, the 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, 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 provide an adequate environmental impact assessment as required by The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations. These regulations mandate that the likely significant environmental effects of the proposal must be identified, assessed, and reported prior to any determination. The absence of such a comprehensive and compliant assessment means that the decision-making authority cannot properly evaluate the environmental consequences of the development, undermining the statutory process and rendering the application incomplete.

Furthermore, the proposal does not demonstrate compliance with the Habitats Regulations, which require a thorough assessment of the effects on European protected sites in accordance with the applicable statutory tests. The evidence identifies deficiencies and omissions in this regard, with no satisfactory demonstration that the proposal will not adversely affect the integrity of protected habitats. Given these failures to meet the legal requirements for environmental impact and habitats regulations assessments, the application conflicts with the relevant legislative and policy framework. Consequently, these matters weigh decisively against the granting of consent.

The proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018, thereby undermining a fundamental statutory requirement that must inform the decision-making process. The Islands (Scotland) Act 2018 explicitly requires that the interests of island communities be taken into account and given due weight when determining planning applications affecting such communities. This statutory obligation is not discretionary but a legal imperative designed to ensure that the unique circumstances and needs of island populations are adequately reflected and protected in planning decisions.

In this instance, the evidence before the determining authority does not demonstrate compliance with this statutory duty. There is a clear absence of any substantive assessment or meaningful engagement that addresses how the proposal impacts the island community’s social, economic, or environmental interests. The failure to provide such consideration constitutes a significant omission and a procedural deficiency in the planning process. Without a proper evaluation of the proposal’s effects on the island community, the decision-making framework is incomplete and legally flawed.

Furthermore, where compliance with the Islands (Scotland) Act 2018 has not been demonstrated, or where the evidence reveals deficiencies or omissions in addressing the interests of island communities, these shortcomings must weigh against the granting of planning consent. The statutory framework and associated

policy guidance are unequivocal in requiring that such failures be treated as material considerations adverse to the proposal.

In conclusion, the proposal does not meet the requirements of the Islands (Scotland) Act 2018 due to its failure to properly consider and give due weight to the interests of island communities. This failure represents a fundamental legal and procedural defect that should result in the refusal of planning permission.

The applicant 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 requirement 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.

1.1.545 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to satisfy the impact criteria outlined in NPF4 Policy 11, thereby undermining the policy's intended support for renewable energy development. Specifically, Policy 11 sets out clear requirements under subsections (c), (d), and (e) regarding the protection of communities, landscapes, seascapes, and other important receptors. The evidence demonstrates that the development would result in significant adverse effects on nationally designated landscapes and seascapes. Moreover, it has not been convincingly shown that the cultural significance of scheduled monuments and their settings would be preserved, nor that the interests and wellbeing of island communities would be adequately safeguarded. Additionally, the ecological assessments provided fail to meet the necessary tests required by the policy.

This lack of compliance with the stated impact criteria is fundamental and cannot be overlooked. NPF4 Policy 11's support for renewable energy is explicitly conditional upon these impacts being appropriately managed and mitigated. Since the proposal does not meet these essential conditions—failing to protect valued landscapes, cultural heritage, community interests, and ecological integrity—it conflicts directly with the policy's provisions. Consequently, the proposal should not be afforded the policy's presumption in favour, as doing so would set a precedent contrary to the careful balance sought by national planning policy.

The proposal fails to comply with multiple National Planning Framework 4 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 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.

1.1.546 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.

The applicant's submission relies on visualisation materials prepared in accordance with NatureScot's visualisation guidance. This guidance explicitly acknowledges inherent limitations in such materials, noting that printed visualisations cannot fully replicate the scale perceived by a viewer in the field. Furthermore, wireline drawings included within the same panoramic projections share these constraints; they represent technical renderings that accompany the photographic evidence rather than serve as independent corrections or enhancements. Consequently, while these visualisations provide a useful reference, their ability to convey the true visual impact of the development is inherently restricted. This limitation should be carefully considered when assessing the overall visual effects, as reliance solely on these materials may understate the experiential scale and presence of the proposed scheme.

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 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.

1.1.547 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 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 in the proposal are closely linked to the findings of the accompanying landscape assessment. It is important to consider that any mitigation measures proposed rely fundamentally on the accuracy and comprehensiveness of the landscape evaluation. When landscape effects are minimised or understated, as has been identified, the proposed mitigation may not adequately address the full scope of potential harm.

This reliance raises significant concerns because the heritage conclusions effectively inherit the deficiencies present in the landscape assessment. If the latter underestimates the visual or environmental impacts, the resulting heritage assessment will similarly understate the potential adverse effects on historic assets. This interconnectedness means that any shortcomings in landscape evaluation directly undermine the credibility of the heritage impact findings.

Accordingly, the robustness of the overall assessment is compromised by this dependence. Without a fully accurate and transparent landscape analysis, the conclusions regarding heritage impacts cannot be regarded as reliable. It follows that the planning authority should carefully scrutinise these linked assessments to ensure

that any mitigation measures are grounded in a comprehensive understanding of the true effects.

The application 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.

1.1.548 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.

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 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.

1.1.549 Ecology, Biodiversity and Habitats Regulations

The proposed development raises significant concerns due to the presence of Priority Marine Features and Annex I habitats within the site itself. This ecological sensitivity is compounded by the surrounding waters, which provide habitat for a range of protected species including seabirds, marine mammals, and basking sharks. Such environmental assets are of considerable conservation importance and warrant thorough consideration in the planning process.

The scale and duration of the proposed activities further intensify these concerns. Construction, operation, and eventual decommissioning are set to occur over several decades, introducing substantial disturbance into a highly sensitive marine environment. The potential for significant adverse environmental effects cannot be overlooked, particularly given the cumulative impacts that long-term, large-scale development may impose on these vulnerable species and habitats.

In light of these factors, careful assessment and robust mitigation strategies are essential to ensure that the ecological integrity of the site and its surroundings is maintained. Without clear evidence demonstrating that the proposal will not cause unacceptable harm to Priority Marine Features and protected marine species, there remains considerable uncertainty about the environmental acceptability of the development as currently proposed.

The 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 legal framework governing developments affecting protected habitats and species is unequivocal in its stringent requirements. Under the Habitats Regulations, consent for such proposals may only be granted if the competent authority has ascertained that the integrity of the protected site will not be adversely affected. This determination must be made with no reasonable scientific doubt, and the burden of proof lies firmly with the applicant. Importantly, the mere existence of mitigation measures, compensation proposals, or plans for future monitoring does not satisfy the statutory tests required for lawful consent.

This rigorous standard is further reinforced by the application of GEN 9 and GEN 13 of the National Marine Plan alongside Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). Together, these provisions underscore the necessity of robust, unequivocal evidence demonstrating no adverse effect on site integrity before consent may be lawfully granted. It follows that any development proposal must meet this high evidential threshold at the point of determination, ensuring that environmental protection remains paramount in the planning process.

The applicant’s 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.

1.1.550 Cumulative and In-Combination Effects

The current assessment approach is fundamentally flawed as it considers only part of the project before the Scottish Ministers, deferring critical components such as the export cable corridor and onshore transmission works to later applications. These

deferred elements are essential for the wind farm's operation, yet their effects are never evaluated collectively with the principal development. This fragmented process prevents a comprehensive assessment of the project's cumulative impacts and contravenes the established legal principle, affirmed by the courts in Raeshaw Farms, that a project must be assessed in its entirety rather than divided into smaller parts whose individual effects appear diminished. Such an incomplete evaluation undermines proper decision-making and fails to meet procedural and legal standards.

The cumulative impact assessment 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 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.

1.1.551 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 (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.

1.1.552 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 acknowledges significant effects on Iona, particularly along the West Coast and at key locations such as Dùn Ì, its highest point. However, this recognition falls short of fully capturing the scale and extent of these impacts. The Coastal Character assessment identifies the Sound of Iona as highly sensitive, with a direct orientation towards the development area and extensive visibility across a large geographical extent. The turbines would be visible over approximately 21 kilometres, spanning around 39 degrees of the horizon, a substantial visual presence. Despite requests from Historic Environment Scotland for additional viewpoints, including from the ferry crossing between Fionnphort and Iona, no visualisations are provided from significant vantage points such as the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn. This omission undermines a comprehensive understanding of the visual and heritage impacts on Iona's internationally important monastic landscape, which is intrinsically linked to pilgrimage, arrival by sea, and movement through the landscape.

Community concerns further highlight shortcomings in the applicant's evaluation. A household consultation revealed that 92 per cent of respondents on Iona object to the proposal, yet the applicant's own consultants identified habitability as a potential pathway of effect that was never fully assessed. The perceived scale of the turbines can be contextualised by comparison with Ben Hynish on Tiree, a familiar landmark standing at 141 metres and visible from Iona at approximately 33 kilometres. The proposed turbines would exceed this height by approximately 194 metres and be situated at roughly two-thirds of that distance, intensifying their visual dominance. Taken together, these factors demonstrate that the applicant's assessment underestimates the significance of visual, community, and heritage impacts on Iona, thereby compromising the accuracy and reliability of the environmental and social impact evaluation.

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 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 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 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 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.

1.1.553 Personal Observations

In addition to the planning matters above, I am personally concerned because: I am a resident on the Isle of Mull and work on the Isle of Iona and so this proposals would impact me and my family through not only the visual magnitude of the proposal but the environmental changes which will accompany it. The objections from people who live and will have to live with the results of it should be taken into high consideration and the project does not adhere to many regulations based to protect the local economy through tourism and the unique protected environment of the hebrides.

Based on my own local knowledge, I also wish to highlight that: Thé hebridean horizon will be drastically different not to mention the tidal changes and impact on the sea floor. The landscape is a great concern due to the size of the project on a relatively untouched part of the country.

Finally, I would also ask the Scottish Ministers to consider: Take the objections of the locals into account and the fact that the island's community have a sustainable approach to energy already and this energy will not be helping or adding to the island but instead utilising our resources for away when we have no need for it. It is not sustainable to destroy and already sustainable habitat.

1.1.554 Summary

The proposal before the Scottish Ministers fails to satisfy the statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities of the coastal area. Furthermore, analyses of the applicant's documentation reveal that the extent of these impacts has been understated. Crucially, the mandatory heritage assessment has not been completed. While the effects on the island communities affected by the development were identified, no assessment of these impacts has been undertaken. Additionally, the ecological criteria required by relevant legislation have not been demonstrated as achievable. It is also notable that the application submitted represents only a portion of the overall project intended for Scottish Ministers' consideration.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm proposal and to reject the associated marine licence. Should the Ministers consider granting approval, it is requested that they require the submission of further environmental information and enhanced visual representations. Moreover, determination of the applications should only proceed following a public inquiry, enabling a thorough examination of the concerns raised in this objection. Regardless of the decision reached, I ask that the Ministers provide clear and reasoned conclusions regarding the impacts on cultural heritage and the affected island communities within their final statement.

Yours faithfully,

[Redacted]

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

Member of the public 660
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.

1.1.555 Seascape, Landscape and Visual 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.

The proposal has resulted in effects that engage multiple critical policies, specifically NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. A detailed examination reveals that the applicant has failed to demonstrate that its conclusions regarding the scale of these effects

align with its own established methodology. Moreover, there is an absence of evidence showing compliance with the policies designed to protect nationally important landscapes and seascapes. In light of this, the proposal does not meet the necessary requirements set out in the relevant planning policies safeguarding these valued environmental interests and should therefore be refused.

1.1.556 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment purports to follow Historic Environment Scotland's recognised methodology for evaluating effects on the setting of historic assets, a process developed through consultation with Historic Environment Scotland itself. This methodology mandates a careful evaluation of whether any changes to setting affect the contribution that setting makes to the cultural significance of heritage assets, with particular attention to whether the integrity of setting is adequately retained. Importantly, it emphasises that visual change alone should not be equated directly with adverse impact. Despite this clear framework, the applicant's assessment fails to demonstrate compliance with these essential evaluative steps.

A Methodological Audit, undertaken in support of community objections and relying solely on the applicant's own Appendix 14.3, reveals that while the operational assessment identifies relevant heritage attributes, it does not show how the integrity of setting has been rigorously assessed in line with the accepted methodology. Instead, the assessment confines itself to describing visual changes—such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—and then summarily concludes that the integrity of setting is adequately retained. This critical evaluative phase, which distinguishes the methodology, is absent from all examined examples. Consequently, the reliability of the applicant's conclusions regarding heritage impacts is fundamentally undermined.

The 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 practical consequence of the deficiencies identified in the landscape assessment is that the heritage impact conclusions drawn from it are fundamentally undermined. The heritage conclusions rely directly upon the findings of the landscape assessment; therefore, any understatement of landscape effects inevitably leads to a corresponding understatement of heritage effects. This interdependence means that where the landscape assessment fails to fully capture or accurately represent the extent of landscape impacts, the subsequent heritage conclusions are rendered less credible. In light of this, the heritage impact conclusions cannot be accepted at face value without addressing and rectifying the shortcomings in the landscape assessment.

1.1.557 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development exhibit an exceptional dependence on visitors, whose presence underpins the local economy. These visitors are primarily attracted by the very qualities identified in the applicant's own baseline assessments: the distinctive landscape and seascape, the rich cultural heritage, and the prevailing sense of tranquillity and remoteness. Such attributes are not merely incidental but form the essential foundation of the visitor economy that sustains these communities.

Any alteration to these fundamental qualities would therefore have a direct and adverse impact on the economic base of the islands. This, in turn, threatens the viability of essential local services, the stability of resident populations, and the broader social sustainability of the communities themselves. The proposal, by jeopardising the key characteristics that draw visitors, risks undermining the long-term future of these island settlements.

The applicant's own consultants have acknowledged that habitability represents a potentially significant pathway through which the proposal could impact island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 adopts a regional approach, focusing in detail on potential port communities while neglecting a comparable, place-based evaluation of the island communities directly facing the development. This regional-level assessment nonetheless concludes that these island communities possess low sensitivity to tourism effects.

Such a conclusion warrants scrutiny, as small island economies differ markedly from regional averages. These economies are typically concentrated in sectors that are highly vulnerable to changes in the qualities attracting visitors. Moreover, their reliance on increasing visitor numbers does not mitigate this vulnerability; rather, it intensifies dependence on the very qualities that the proposal risks altering.

Therefore, the conclusion of low sensitivity—arrived at without a place-based analysis—is not substantiated by evidence but constitutes an assumption. Consequently, the socio-economic assessment methodology employed is flawed and insufficient to adequately understand or mitigate the potential impacts on island communities.

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

In this context, the applicant has not demonstrated that the proposal is compatible with the sustainability of island communities, nor has it evidenced compliance with the statutory duties owed to these populations. The failure to undertake the necessary socio-economic assessment and to engage meaningfully with island stakeholders undermines the soundness of the proposal under the relevant planning policies and statutory instruments. Consequently, the proposal falls short of the required standards for assessing and protecting island communities, warranting refusal on the basis of non-compliance with established policy and statutory duties.

1.1.558 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 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.

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.

1.1.559 Public Engagement, Site Selection and Environmental Information

There is considerable uncertainty regarding the adequacy of public participation in the site-selection process, which raises important questions about the legitimacy of

the decisions made. The applicant invites Scottish Ministers to place significant weight on this process; however, the quality of participation at both the plan and site-selection stages has been deficient and these shortcomings have persisted into the current application phase. The application itself comprises many thousands of pages of technical material, yet the consultation period coincided with the busiest months for island communities, when residents are engaged continuously throughout the visitor season and access to specialist advice is limited. In contrast, the applicant has had years to prepare and considerable professional and financial resources at its disposal. Furthermore, National Marine Plan policy GEN 18, alongside the principles of effective public participation enshrined in the Aarhus Convention, stipulates that those affected must have a realistic opportunity to engage in decisions of such magnitude. The conditions imposed on affected communities here fall short of this standard, a factor which Ministers should carefully consider when weighing the representations submitted.

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.

1.1.560 Effects on Local Area

The applicant's assessment significantly underestimates the direct and substantial effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Although Islay and Colonsay are the closest inhabited islands to the development area—which lies immediately north-west of Islay and west of Colonsay—the application primarily treats Islay as a potential project location rather than as a distinct island community likely to be affected. This approach fails to provide any place-based evaluation of how the 448 square kilometre development area, particularly its Atlantic-facing edge closest to Islay, might impact the island's setting, local economy, or community life.

For Colonsay and Oronsay, the shortcomings are equally pronounced. The seaward outlook that shapes daily life on these islands faces directly towards the development array, with Colonsay's coastline designated as the North Colonsay and Western Cliffs Special Protection Area. This area is central to the applicant's

derogation case and compensation plan, implicitly acknowledging that harm to the internationally protected seabird populations there cannot be ruled out. Moreover, Oronsay Priory—a scheduled monument of national importance—lies within this community's vicinity, yet the heritage assessment fails to adequately address the effects on its open maritime setting. These gaps fundamentally undermine the reliability of the environmental and heritage impact evaluation presented in the application.

The applicant's own Coastal Character assessment acknowledges the Sound of Iona as an area of high sensitivity, directly oriented towards the proposed development, with extensive visibility and a large geographical extent of change. The assessment identifies a Moderate and Significant overall effect at approximately 21 kilometres, with turbines spanning roughly 39 degrees of the horizon. Similarly, the West Coast of Iona is recognised as highly sensitive with widespread visibility, and the applicant concedes significant effects on residents and visitors across much of the island, including at Dùn Ì, Iona's highest point.

Iona's monastic landscape, encompassing the Abbey, the Nunnery, and the high crosses, is of international heritage importance. The applicant's baseline identifies pilgrimage, sea arrival, and movement through the landscape as central to this significance. Historic Environment Scotland requested additional viewpoints, notably from the ferry crossing itself; however, no visualisation has been provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, a notable omission given the cultural context.

A household consultation on Iona revealed that 92 per cent of respondents object to the proposal, yet the applicant's own consultants identified habitability as a potential pathway of effect on this community—a factor that remains unassessed. To further contextualise the scale of the impact, the turbines would exceed the height of Ben Hynish on Tiree (141 metres high and visible from Iona at approximately 33 kilometres) by about 194 metres, despite being situated roughly two-thirds of that distance away.

Taken together, these points demonstrate that the applicant's assessment underestimates the scale and significance of visual, community, and heritage impacts on Iona, thereby compromising the accuracy of the environmental and social impact evaluation.

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

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

The applicant’s assessment significantly underestimates the impacts 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 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.

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 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.

1.1.561 Summary

The proposal for the MachairWind Offshore Wind Farm has failed to demonstrate compliance with the applicable statutory and policy frameworks governing its determination. The applicant's own assessment acknowledges significant impacts on nationally designated landscapes, as well as on the cultural heritage and communities along this coastal area. Moreover, independent reviews of the submitted documents reveal that these impacts have been understated. Crucially, the necessary heritage assessment has not been undertaken, and although the effects on the island communities within the project's influence were identified, they have never been formally assessed. Additionally, the ecological requirements have not been proven to be achievable. It should also be noted that the application before the Scottish Ministers does not encompass the entire project.

Given these substantial shortcomings, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm and to reject the associated marine licence. Should the Ministers consider proceeding with the application, I request that they require the submission of further environmental information alongside enhanced visualisations. In such a scenario, the determination of the applications ought to be deferred until after a public inquiry, 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 to 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 661
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.

1.1.562 Seascape, Landscape and Visual Effects

The applicant’s assessment methodology fails to establish a clear distance threshold beyond which major effects cease, yet empirical analysis reveals a consistent pattern: no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of its intrinsic sensitivity or the extent of visibility. This finding emerges from a comprehensive review of the applicant’s Chapter 16 and Appendices 16.1 to 16.3, underscoring a systematic limitation in the evaluation approach that directly influences the classification of potential impacts.

Further examination of the applicant’s documentation corroborates the significant role that distance plays in these judgements. For example, an assessment of a coastal area located over 30 kilometres away concludes that, due to the viewing distance, the scale of change is judged to be small. Similarly, the Landscape Character synthesis delineates a gradation of impact magnitude, with High magnitude effects confined to within approximately 20 kilometres, Medium effects occurring between 20 and 30 kilometres, and Low effects beyond 30 kilometres for certain landscape types. This systematic moderation of magnitude at precisely the distances where the most sensitive designated landscapes lie results in protective tests being applied to understated inputs. Consequently, the conclusions drawn from

the assessment do not reliably represent the true effects that Scottish Ministers are being asked to consent to.

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

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

The proposal fails to 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.

1.1.563 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 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.

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.

1.1.564 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.

There remains significant uncertainty regarding the adequacy of the socio-economic assessment in understanding the impacts on island communities. Notably, the applicant's own consultants identified habitability as a potentially significant pathway for effects on these communities, yet no specific assessment of the habitability of the affected islands was undertaken. Instead, the assessment in Chapter 18 focuses on regional-level analysis, giving detailed consideration to port communities but failing to provide an equivalent place-based evaluation for the island communities directly facing the development. Despite this omission, the assessment nonetheless concludes that these island communities are of low sensitivity to tourism effects. This conclusion is fundamentally flawed, as small island economies cannot be represented as regional averages; their economic reliance is concentrated in sectors highly vulnerable to changes in the qualities that attract visitors. Far from reducing sensitivity, dependence on increasing visitor numbers exacerbates vulnerability to impacts on these qualities. Therefore, the assertion of low sensitivity, reached without any place-based analysis, lacks evidential support and must be regarded as an unfounded assumption. In closing, this critical gap undermines confidence in the applicant's methodology and its ability to understand or mitigate the socio-economic impacts on island communities.

1.1.565 Ecology, Biodiversity and Habitats Regulations

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

The proposed development would introduce large-scale construction, operational, and decommissioning activities into this ecologically sensitive environment over a prolonged period extending to several decades. Such extensive and sustained disturbance carries the potential for significant adverse environmental effects, raising concerns about the long-term impacts on the Priority Marine Features and the

protected species dependent on these habitats. Careful consideration of these factors is essential in the assessment of the proposal.

The practical consequence of the applicant's submission of a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan is that 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 applicant acknowledges that under the Habitats Regulations, consent for developments affecting protected sites may only be granted where the competent authority has determined that the proposal will not adversely affect the integrity of the site, unless the stringent derogation tests are satisfied. It is imperative that no reasonable scientific doubt remains regarding the absence of adverse effects. This high evidential standard places the onus firmly on the applicant to demonstrate compliance; importantly, proposed mitigation, compensation measures, or future monitoring cannot, in isolation, substantiate that the statutory tests have been fulfilled. This legal framework is reinforced by the provisions of the Habitats Regulations, alongside GEN 9 and GEN 13 of the National Marine Plan, and Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. Consequently, any planning consent must be underpinned by robust, conclusive evidence to satisfy these overlapping statutory and policy requirements.

The 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.

1.1.566 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.

1.1.567 Effects on Local Area

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 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 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 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 proposed development area, resulting in an incomplete evaluation of potential impacts. This omission carries practical consequences for those communities whose well-being and local economies depend on the seascape, as their concerns remain unaddressed and their interests inadequately represented in the planning process.

Notably, the community-owned island of Gigha, a nationally recognised symbol of island regeneration following its purchase by residents, faces the development site from the east. The finely balanced community and economy of Gigha have not been examined in the applicant’s assessment, despite the likely sensitivity of this receptor to changes in seascape character and visual amenity. Similarly, Ardnamurchan Point—the most westerly point of the British mainland—offers panoramic views along the Hebridean seaboard that attract visitors to the peninsula. These seaward panoramas are precisely the kind of receptors affected by the distance-based visual impact moderation that this objection highlights, yet they have not been properly accounted for.

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

1.1.568 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 662
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.

1.1.569 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.

1.1.570 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development rely heavily on visitors, who are drawn specifically by the qualities identified in the applicant's own baseline assessments: landscape, seascape, cultural heritage, tranquillity, and remoteness. These attributes are not merely incidental; they constitute the core appeal that sustains the visitor economy upon which these communities depend to an exceptional degree.

Any alterations to these fundamental qualities would therefore have a direct and detrimental impact on the economic foundation of the island communities. Such an impact would extend beyond economics, threatening local services, population stability, and ultimately the long-term viability of these communities. The proposal, by undermining the very characteristics that attract visitors, poses a significant risk to the social and economic sustainability of the islands.

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

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

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

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

Mitigation, compensation proposals, and future monitoring measures, while important considerations, are insufficient on their own to satisfy the stringent requirements set by the Habitats Regulations for granting consent to developments affecting protected sites. The competent authority must be convinced beyond reasonable scientific doubt that the proposal will not adversely affect the integrity of the habitat in question. This represents a high evidential threshold which the applicant bears the burden of demonstrating, ensuring that no residual uncertainty remains regarding potential harm.

This legal framework is further reinforced by relevant planning policies, including GEN 9 and GEN 13 of the National Marine Plan and Policies 3, 4(b), 4(e), and 4(f) of NPF4. Together, they underscore the critical importance of safeguarding protected habitats and species, mandating that any consent be contingent on the strict derogation tests being met. Consequently, the policy and legislative context demands rigorous scientific certainty rather than reliance on proposed mitigation alone.

The 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.

1.1.572 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.

1.1.573 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.

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.

1.1.574 Effects on Local Area

There remains considerable uncertainty regarding the adequacy of the applicant's assessment of direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Although Islay and Colonsay lie closest to the proposed development area, which spans 448 square kilometres immediately north-west of Islay and west of Colonsay, the application primarily considers Islay as a potential project location rather than as an affected island community in its own right. This approach neglects a place-based evaluation of impacts on Islay's Atlantic-facing communities, whose setting, economy, and community life face the nearest edge of the development zone without proper assessment. For Colonsay and Oronsay, the seaward outlook integral to daily life directly confronts the array, and the North Colonsay and Western Cliffs Special Protection Area—part of Colonsay's coastline—is central to the applicant's derogation case and compensation plan. This acknowledges that harm to the internationally protected seabird population on these cliffs cannot be excluded. Moreover, Oronsay Priory, a scheduled monument of national importance within this community, is subject to the same identified gaps in the heritage assessment, particularly regarding its open maritime setting. Taken together, these points demonstrate that the applicant's environmental and heritage impact evaluation lacks the necessary depth and reliability concerning these island communities.

While some mitigation measures have been proposed, they do not adequately address the significant and underestimated impacts on Iona. The Coastal Character assessment recognises the Sound of Iona as having high sensitivity, with a direct

orientation towards the development area and extensive visibility spanning approximately 21 kilometres. The turbines would extend across about 39 degrees of the horizon, resulting in a moderate and significant overall effect that is unlikely to be fully mitigated. Similarly, the West Coast of Iona is identified as highly sensitive with widespread visibility, and the applicant concedes significant effects on residents and visitors across much of the island, including at its highest point, Dùn Ì. Furthermore, Iona's internationally important monastic landscape—comprising the Abbey, the Nunnery, and the high crosses—is closely tied to pilgrimage and arrival by sea. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing, yet no visualisation has been provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, leaving a critical gap in the assessment of heritage impacts. Community concerns reinforce these findings; a household consultation revealed that 92 per cent of respondents on Iona object to the proposal, and notably, the applicant's own consultants identified habitability as a potential pathway of effect for this community, which remains unassessed. To contextualise the scale of the visual impact, the turbines' height would surpass that of Ben Hynish on Tiree—141 metres high and visible from Iona at approximately 33 kilometres—by approximately 194 metres, despite being situated at roughly two-thirds of that distance. Taken together, these factors demonstrate that the applicant's assessment understates the scale and significance of visual, community, and heritage impacts on Iona, thereby compromising the accuracy of the environmental and social impact evaluation.

The applicant's assessment recognises significant effects on several key areas of Mull and the Ross of Mull, notably the Ross of Mull South coastal area, which is identified as having High sensitivity at distances of approximately 22 to 24 kilometres, with a Medium magnitude of impact attributed. The assessment acknowledges significant effects at Erraid and on the Core Paths of the Ross, as well as at Fionnphort, the community serving as the gateway to Iona and the primary point of embarkation for visitors. This community is explicitly noted as being most directly linked to the flow of visitors, whose experience the applicant concedes would be significantly affected. Similarly, across Mull, significant effects are accepted on Core Paths and within the Central, South, and West Mull Local Landscape Area. The Loch na Keal National Scenic Area, encompassing Mull's western waters and islands, is assessed as having High sensitivity throughout, at viewing distances between approximately 21 and 33 kilometres, yet only a Medium magnitude of impact is attributed. This suggests an underestimation of potential visual and experiential effects in sensitive, designated landscapes.

A further concern arises from the applicant's treatment of the Wilderness and Gribun Rocks coastal area, where the assessment relies heavily on distance-based reasoning, concluding that due to viewing distances exceeding 30 kilometres, the scale of change is small. Such reasoning fails to fully account for the qualitative importance of these landscapes and their coastal character to the local communities and tourism economy. Mull's west-facing tourism sector, including wildlife boat operators and accommodation providers in its western townships, depends fundamentally on the integrity of the Atlantic seascape, which the proposed development would industrialise. Notably, no place-based assessment has been undertaken for these communities, leaving a significant gap in understanding the cumulative visual, economic, and community impacts. This omission undermines the

robustness of the applicant's conclusions and suggests the need for a more comprehensive and locally attuned evaluation of effects on Mull and the Ross of Mull coastal communities and landscapes.

The applicant's assessment recognises 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.

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 significant effects on mainland and island communities that have direct visual connections to the proposed development site and whose economies are closely linked to the seascape in question. Notably, Gigha, a community-owned island emblematic of island regeneration following its purchase by local residents, faces the development waters from the east. Despite its finely balanced community and economy, no examination of the potential impacts on Gigha has been undertaken. 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 a key receptor group; however, the applicant's use of distance-based moderation effectively excludes such receptors from meaningful consideration. Furthermore, the west coast of Kintyre comprises a series of communities whose identity, character, and visitor economy are intrinsically tied to the open Atlantic seaboard facing Islay, Jura, and adjacent waters. The Treshnish Isles and other small islands and mainland coasts with sightlines toward the development area share this same position. Collectively, the omission of these communities and their seascape reliance from the assessment undermines its comprehensiveness and robustness. In conclusion, the applicant's failure to account for these receptors constitutes a significant oversight that compromises the integrity of the environmental appraisal and calls into question the adequacy of the proposed assessment methodology.

1.1.575 Summary

The proposal for the MachairWind Offshore Wind Farm fails to demonstrate compliance with the relevant statutory and policy framework governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the local communities and heritage of the coastal area. Moreover, independent scrutiny of the submitted documentation reveals that the magnitude of these impacts has been underestimated. Crucially, the necessary heritage assessment has not been conducted, and while effects on the island communities were identified, they have never undergone a comprehensive appraisal. Additionally, the ecological criteria required to support the proposal have not been satisfactorily demonstrated as achievable. It is also notable that only a portion of the entire project is currently before the Scottish Ministers for consideration.

In light of these deficiencies, it is respectfully urged that the Scottish Ministers refuse consent for the MachairWind Offshore Wind Farm and decline the associated marine licence. Should the Ministers contemplate approval, it is requested that they first mandate the submission of further environmental information and enhanced visual representations. Furthermore, determination of the applications should be deferred until after a public inquiry, allowing for thorough examination of the concerns raised in this objection. Irrespective of the ultimate decision, it is also requested that Ministers explicitly address and conclude on the proposal's effects on cultural heritage and the island communities within their stated reasons.

Yours faithfully,

[Redacted]

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

Member of the public 663
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.

1.1.576 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 under consideration fails to comply with the statutory requirements set out in Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland's National Marine Plan. As the authorisation decision must be taken in accordance with the National Marine Plan unless relevant considerations

indicate otherwise, the absence of demonstrated compliance with key General Policies is a fundamental procedural and substantive defect. This failure undermines the statutory basis for granting consent and renders the application legally deficient.

Specifically, the application does not adequately address compliance with General Policies GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts). These policies collectively require a thorough and evidenced assessment of environmental, cultural, and social factors, as well as meaningful engagement and consideration of cumulative effects. The absence of such evidence and assessment constitutes a clear omission and conflict with the applicable legal and policy framework.

Given these deficiencies and the failure to demonstrate compliance with the statutory and policy requirements, the application cannot lawfully be granted consent. The Marine (Scotland) Act 2010 and the National Marine Plan impose a mandatory obligation to refuse authorisation where compliance is not established. Therefore, on the grounds of non-compliance with the statutory framework and relevant National Marine Plan policies, this marine licence application should be refused.

The proposal fails to demonstrate compliance with key policies of National Planning Framework 4, specifically Policies 3, 4, 7, and 11, which address biodiversity, natural places, historic assets, and energy. As a significant material consideration, the Framework must be applied alongside statutory duties and legislative requirements, yet the application does not provide sufficient evidence to satisfy these policy obligations. This failure to comply undermines the statutory and policy framework intended to protect environmental and heritage interests.

Furthermore, the evidence identifies clear deficiencies and omissions in the application’s assessment and justification against the relevant policies of the Framework. Where such non-compliance and conflicts with legal and policy requirements exist, they weigh decisively against the granting of consent. Accordingly, the proposal should be refused on the basis that it does not meet the mandatory standards set out in National Planning Framework 4.

The proposal fails to comply with the mandatory requirements for environmental impact assessment as set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations. These regulations explicitly require that the likely significant environmental effects of the development be identified, assessed, and reported prior to any determination. In this case, the necessary comprehensive assessment has not been provided, leaving the decision-making process without the essential information needed to understand the full environmental consequences of the proposal.

Furthermore, the proposal does not satisfy the requirements of the Habitats Regulations, which mandate an 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 designated sites have not been adequately considered or demonstrated to be acceptable. This omission represents a clear failure to meet the legal obligations designed to protect important ecological interests.

Given these significant deficiencies and the failure to demonstrate compliance with both the environmental impact assessment and habitats regulations frameworks, the proposal conflicts with the applicable legal and policy requirements. Such shortcomings weigh decisively against the granting of consent, as the statutory tests have not been met and the environmental risks remain unquantified and unmitigated. Consequently, the application should be refused on these grounds.

The proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018. This statutory requirement explicitly demands that the interests of island communities be taken into account and given due weight in the decision-making process. The submitted evidence does not demonstrate compliance with this obligation, revealing deficiencies and omissions in addressing the specific needs and circumstances of island communities. Such failures constitute a conflict with the applicable legal and policy framework. In accordance with established principles, where compliance with the Islands (Scotland) Act 2018 is not demonstrated, and where deficiencies or omissions exist, these matters must weigh against the granting of consent. Therefore, the application should be refused on the basis that it does not meet the statutory requirements to properly consider and give due weight to the interests of island communities.

The applicant has failed to discharge the fundamental responsibility of demonstrating compliance with all relevant legal and policy requirements. It is incumbent upon the applicant to provide robust, objective, and proportionate evidence that every applicable statutory duty, planning policy, and environmental assessment obligation has been fully satisfied. In this case, the evidence submitted does not meet this evidential burden. Deficiencies, omissions, and conflicts with the legal and policy framework remain unaddressed and unremedied. As a result, the application lacks the necessary foundation to establish lawful and policy-compliant development. Consequently, these unresolved matters must weigh decisively against the granting of planning consent.

1.1.577 Conflict with National Planning Framework 4 and the Development Plan

There is considerable uncertainty as to whether the proposal complies with the impact criteria set out in National Planning Framework 4 (NPF4) Policy 11. Although the policy offers support for renewable energy development, such support is expressly conditional upon adherence to its impact provisions, notably those relating to communities and the natural and cultural environment.

Specifically, the proposal appears to conflict with key elements of Policy 11. It would result in significant adverse effects on nationally designated landscapes and seascapes, while the protection of the cultural significance of scheduled monuments and their settings has not been satisfactorily demonstrated. Furthermore, there is a lack of evidence to confirm that island communities would be adequately

safeguarded, and the ecological assessments submitted fail to show that necessary environmental tests can be met.

Given these uncertainties and identified shortcomings, the proposal does not presently meet the comprehensive impact requirements of NPF4 Policy 11. This undermines the policy's conditional support for the development and raises serious concerns about its overall compliance.

While some mitigation measures have been proposed, they fall short when assessed against the requirements of relevant NPF4 policies protecting designated assets. Policy 11 must be read alongside Policy 4(c) and 4(d), which safeguard National Scenic Areas and nationally important landscapes from significant adverse effects on their defining qualities, as well as Policy 7—particularly Policy 7(h) concerning scheduled monuments and Policies 7(c) and 7(d) addressing the setting of historic assets—and Policy 3 on biodiversity. The evidence demonstrates that the proposal would result in significant adverse effects on these nationally designated landscapes and seascapes. Furthermore, it has not been adequately shown that the cultural significance of scheduled monuments and their settings would be preserved, nor that island communities would be effectively protected. Crucially, the ecological criteria set out in Policy 3 have not been proven capable of being met based on the submitted evidence. In summary, the proposal fails to comply with multiple interrelated NPF4 policies designed to safeguard nationally important landscapes, heritage assets, and biodiversity.

The 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.

1.1.578 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 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.

The introduction of aviation and navigation lighting to an otherwise unlit sea horizon will permanently alter the character of the night-time seascape for the full 35-year operational period of the development. This change is not merely a temporary inconvenience; it represents a fundamental and lasting transformation of the visual environment. Moreover, from a policy perspective, granting consent for this development effectively endorses the suitability of this seascape for wind farm use, thereby setting a precedent for future decisions. Such implications must be carefully weighed in considering the acceptability of the proposal.

The 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.

1.1.579 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 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 the deficiencies identified in the landscape assessment is that the heritage impact conclusions drawn from it lack credibility. Since the heritage conclusions are explicitly dependent on the landscape assessment, any understatement of landscape effects directly translates into an understatement of heritage effects. This linkage means that the overall assessment fails to accurately represent the true extent of harm to heritage assets.

The reliance on a flawed landscape assessment creates a cascading effect in the evaluation process. When landscape effects are understated, as demonstrated above, the heritage conclusions that build upon them inevitably inherit the same shortcomings. This results in an overall assessment that does not fully acknowledge or address the potential adverse impacts on the historic environment, thereby undermining the robustness of the planning evidence base.

In light of these concerns, it is essential that the assessment methodology and findings be revisited to ensure that landscape effects are accurately and comprehensively evaluated. Without rectifying these deficiencies, the heritage impact conclusions remain fundamentally compromised, weakening the justification for the proposed development in terms of its effects on heritage assets.

The application fails to 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.

1.1.580 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 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 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.

1.1.581 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 submission of a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan by the applicant has a direct and practical consequence for the assessment of this proposal. These documents acknowledge that adverse effects on the integrity of the North Colonsay and Western Cliffs Special Protection Area cannot be ruled out at this stage. The applicant's decision to prepare and submit such evidence indicates an understanding that the project may impact the protected guillemot population, necessitating consideration under derogation provisions to allow for potential disturbance or loss.

Analytically, the presence of these documents as part of the application is significant in itself. They demonstrate that the applicant recognises the sensitivity of the designated site and is seeking to address potential impacts through compensatory measures. However, the applicant's own approach concedes that Scottish Ministers might ultimately reach a different conclusion regarding the likelihood or extent of adverse effects. This acknowledgement highlights the need for careful scrutiny of the derogation and compensation proposals to ensure that any harm to the protected features is adequately mitigated, in accordance with relevant policy and statutory requirements.

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 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.

1.1.582 Cumulative and In-Combination Effects

The current planning application before the Scottish Ministers addresses only a portion of the overall development, specifically excluding the export cable corridor and onshore transmission works, which are essential components without which the wind farm cannot function. These elements are deferred to separate, subsequent applications. Consequently, the environmental and planning effects of the entire project are never collectively assessed at a single point in the consenting process. This fragmented approach results in important aspects of the development being considered only after the principal decision has been made.

This manner of project assessment is inconsistent with established legal principles, as underscored in the Raeshaw Farms judgment. The courts have affirmed that a project must be evaluated in its entirety rather than being segmented into smaller parts whose individual impacts may appear less significant. By effectively "salami-slicing" the project, the current approach prevents a comprehensive evaluation of the cumulative effects, undermining the integrity of the decision-making process. Therefore, the assessment methodology applied here is procedurally and legally flawed, rendering the current consent process incomplete and insufficient.

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.

1.1.583 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.

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.

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

The applicant's 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.

1.1.585 Personal Observations

In addition to the planning matters above, I am personally concerned because: I have family that live on Mull and work on Iona and have concerns over environmental impacts and concerns over the multiple of the project.

Based on my own local knowledge, I also wish to highlight that: I have particular concerns over the wildlife and tidal impacts which would greater impact the island , wildlife , ferrys etc.

Finally, I would also ask the Scottish Ministers to consider: More recognition of the opinions of the islands and the islanders that inhabit them.

1.1.586 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 664
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.

1.1.587 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.

1.1.588 Effects on Island Communities, Tourism and the Local Economy

While mitigation measures may be proposed to address certain environmental or visual impacts of the development, it is imperative to recognise that such measures

cannot fully preserve the essential qualities that underpin the appeal of these island communities. The applicant's own baseline assessments identify key attributes—landscape, seascape, cultural heritage, tranquillity and remoteness—that are integral to the visitor experience. Any diminution of these qualities, even if partially mitigated, risks undermining the very characteristics that attract visitors in the first place.

This dependency on visitors is of exceptional significance for the island communities affected by the proposal. These communities rely heavily on visitor-generated economic activity, and the erosion of their landscape and cultural assets would directly impact their economic base. The consequent effects would extend beyond tourism to threaten local services, population stability and the broader social sustainability of the islands. Therefore, the proposal presents a fundamental threat to the long-term viability of these communities, as it jeopardises the qualities that sustain both their economies and their social fabric.

1.1.589 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.

1.1.590 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.

1.1.591 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 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 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.

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 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.

1.1.592 Personal Observations

In addition to the planning matters above, I am personally concerned because: Sound & vibration of turbines. Turbines will tower above the skyline/hills of Loch indaal from Bowmore spoiling a local view point which tourists and locals a like visit for unspoilt beauty/sunsets.

Based on my own local knowledge, I also wish to highlight that: Our local environment, landscape and wildlife could be jeopardised for power/money that will not benefit our local islands. Our areas, if being compromised, should be done so for our own benefit. Leave our land and sea as the locals know, want and deserve

Finally, I would also ask the Scottish Ministers to consider: Do not spoil our unspoilt islands

1.1.593 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 665
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.

1.1.594 Legislative and Policy Framework

The application fails to demonstrate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989. Schedule 9 mandates that the applicant must have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant is required to take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The Scottish Ministers, in determining the application, are also required to have regard to these statutory duties. The evidence before the authority identifies deficiencies and omissions in the applicant’s consideration of these duties, resulting in a failure to demonstrate compliance. Such shortcomings weigh decisively against the granting of consent.

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

The submitted application does not provide adequate evidence to confirm compliance with these policies. There are identifiable deficiencies and omissions in the assessment of impacts on the historic environment and natural heritage, as required under GEN 6 and GEN 9. The application also lacks sufficient engagement records as mandated by GEN 18, and fails to present sound evidence in accordance with GEN 19. Furthermore, cumulative impacts have not been properly addressed in line with GEN 21. These shortcomings constitute conflicts with the applicable legal and policy framework.

Given that compliance with the National Marine Plan policies forms a statutory part of the assessment, and the application has not demonstrated such compliance, these failures weigh decisively against the granting of consent. The marine licence application should therefore be refused.

The 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 proposal fails to provide the comprehensive environmental impact assessment mandated by The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which require all likely significant environmental effects to be identified, assessed, and reported prior to determination. This fundamental procedural requirement has not been met, resulting in an incomplete understanding of the proposal's environmental consequences and undermining the statutory decision-making process.

Furthermore, the proposal does not demonstrate compliance with the Habitats Regulations, which obligate a thorough assessment of effects on European protected sites in accordance with the applicable statutory tests. The absence of such an assessment constitutes a clear deficiency and omission in the application. Given these failures to satisfy essential legal and policy requirements, the proposal conflicts with the established environmental protection framework. Consequently, these shortcomings weigh decisively against the granting of consent.

The proposal fails to 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 dispel fundamental uncertainty regarding compliance with the full spectrum of relevant legal and policy requirements. It is a well-established principle that the onus lies squarely on the applicant to provide robust, objective, and proportionate evidence demonstrating that every applicable statutory duty, planning policy, and environmental assessment obligation has been met. In this case, the evidence submitted does not meet this evidential burden. The absence of comprehensive and conclusive proof leaves critical questions unresolved about whether the proposal aligns with the necessary legal and policy frameworks. This lack of clarity undermines confidence in the application's conformity with statutory and policy mandates.

Moreover, the evidence presented reveals clear deficiencies and omissions that directly conflict with the applicable legal and policy framework. Where such conflicts or gaps exist, established planning principles dictate that these matters must weigh decisively against the granting of consent. The applicant's failure to demonstrate

compliance in these respects is not a mere procedural oversight but a substantive shortcoming that precludes lawful approval. Given the unresolved uncertainties and demonstrable evidential failings, the proposal cannot be considered compliant with the statutory and policy requirements that govern the planning process. Consequently, the application should be refused on the basis that the applicant has not fulfilled the necessary responsibility to prove compliance.

1.1.595 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'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.

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.

1.1.596 Seascape, Landscape and Visual Effects

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

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 introduction of aviation and navigation lighting associated with the proposed development would permanently alter the night-time character of the currently unlit sea horizon for the entire 35-year operational period. This change is not merely a temporary effect limited to the lifespan of the development; rather, consenting to this proposal effectively acknowledges that the seascape is appropriate for wind farm use, with all attendant visual and environmental implications. Such a decision sets a precedent for the acceptability of lighting impacts in this sensitive seascape, fundamentally changing its character in a manner that should be carefully weighed against relevant policy considerations.

The applicant's 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.

1.1.597 Cultural Landscape, Archaeology and Historic Environment

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

However, a Methodological Audit prepared in support of community objections has demonstrated that the applicant's operational assessment does not fulfil this requirement. Although the assessment identifies relevant heritage attributes and discusses factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it stops short of showing how the integrity of

setting has been evaluated in accordance with the adopted methodology. The absence of this crucial evaluative step undermines the reliability of the applicant's conclusions that the integrity of setting is adequately retained, thereby calling into question the overall validity of the heritage impact assessment.

While the applicant'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 impact assessment relies heavily on the findings of the landscape assessment, which serves as a foundational element in determining the extent of heritage effects. However, as established, the landscape assessment has systematically understated the magnitude of landscape effects. This understatement inevitably permeates the heritage conclusions, resulting in an overall minimisation of the potential heritage impacts. Consequently, the credibility of the heritage impact conclusions is compromised by their dependence on an assessment that does not fully capture the true extent of landscape effects. It follows that any mitigation measures proposed, based on these heritage conclusions, may be insufficient to address the actual level of harm. Therefore, the reliance on the current landscape assessment undermines the robustness of the heritage impact evaluation, warranting a more thorough and accurate assessment to inform appropriate mitigation strategies.

The 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.

1.1.598 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.

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 essential planning and statutory requirements concerning island communities, notably neglecting the thorough assessment demanded by GEN 19 and paragraph 4.81 of the National Marine Plan. These provisions mandate that decisions affecting island communities be grounded in robust socio-economic evidence and adopt a precautionary approach where such evidence is insufficient. Furthermore, NPF4 Policy 11(c) alongside the Islands (Scotland) Act 2018 explicitly require that the interests of island communities be carefully evaluated and given due

weight through meaningful engagement from the earliest stages through to the conclusion of any decision-making process.

Despite recognising that island communities warrant particular scrutiny, the applicant has not conducted the necessary assessment to comprehend fully the potential effects of the proposal on these communities. There is a clear absence of evidence demonstrating compatibility with sustainable island communities, and as such, the applicant has not satisfied the statutory duties owed to these populations. This omission represents a significant shortfall in meeting the standards set by relevant policy and legislation, undermining the integrity of the decision-making framework.

In conclusion, given the quantifiable lack of assessment and failure to discharge statutory obligations, the proposal cannot be considered compliant with the comprehensive planning and statutory duties designed to protect island communities. It is therefore appropriate that the proposal be refused on these grounds to ensure that the interests and sustainability of island communities are properly safeguarded.

1.1.599 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, which are acknowledged as ecologically significant within the site itself. Additionally, the surrounding waters provide a habitat for various protected species, including seabirds, marine mammals, and basking sharks. This establishes the site and its adjacent marine environment as areas of high ecological sensitivity and importance.

The proposed development would involve construction, operational, and decommissioning activities carried out on a very large scale over several decades. Given the presence of these sensitive habitats and protected species, such extensive and prolonged disturbance poses a substantial risk of significant adverse environmental effects. Careful consideration of these ecological factors is essential in the planning process to ensure the protection and conservation of the marine environment within and around the development site.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan, specifically targeting the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. The preparation and presentation of these documents indicate a recognition by the applicant that there may be potential adverse effects on the integrity of this protected site as a result of the proposed development. Such documents are conventionally prepared and provided in circumstances where the possibility of an adverse effect cannot be definitively ruled out. The very inclusion of these materials in the application package is thus a significant feature, reflecting the applicant’s acknowledgement of potential environmental impacts that warrant careful consideration.

Moreover, the submission of these derogation and compensation documents operates within the framework that the Scottish Ministers might ultimately reach a different conclusion regarding adverse effects than the applicant. This highlights a degree of uncertainty inherent in the assessment process and underscores the

importance of these documents in addressing the requirements for derogation under relevant protection provisions. The compensation plan, focused on the guillemot population, seeks to mitigate potential harm to this protected species, aiming to offset any unavoidable impacts should the development proceed. In this context, the applicant's approach demonstrates an awareness of the statutory and policy obligations concerning protected sites and species, and an intention to comply with those obligations through appropriate mitigation and compensation measures.

The applicant correctly acknowledges that under the Habitats Regulations, consent for developments affecting protected sites may only be granted where the competent authority has ascertained that the proposal will not adversely affect the integrity of the site, except where the stringent derogation tests are satisfied. It is essential to recognise that consent can lawfully be granted only when there is no reasonable scientific doubt concerning the absence of adverse effects. Furthermore, the burden of demonstrating this rests squarely with the applicant, and measures such as mitigation, compensation proposals, and future monitoring, while potentially beneficial, do not in themselves suffice to prove that the statutory tests have been met.

This legal framework is reinforced by relevant planning policies, including GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). These policies collectively impose a high evidential standard to safeguard protected habitats and species, ensuring that development proposals must be supported by robust and conclusive scientific evidence before consent can be granted. The integration of these policies with the Habitats Regulations underlines the comprehensive and precautionary approach required in decision-making.

Given this context, it is imperative that any development proposal subject to these requirements must provide unequivocal scientific evidence demonstrating no adverse effect on the protected site's integrity. Reliance on mitigation or monitoring alone is insufficient to meet the legal and policy standards. Therefore, decision-makers should maintain rigorous scrutiny of the evidence presented, ensuring compliance with both the statutory tests and the accompanying planning policies before granting consent.

The applicant has not demonstrated that the statutory tests 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.

1.1.600 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.

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.

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.

1.1.601 Public Engagement, Site Selection and Environmental Information

The consultation process associated with the site-selection and application stages has exhibited significant deficiencies in public participation, which critically undermines the legitimacy of the decision-making framework. The applicant places considerable weight on the site-selection process, rendering the quality of public engagement directly material to the determination. However, the extensive technical documentation submitted spans many thousands of pages, and the consultation period has coincided with the peak months of the year for island communities. During this time, local residents are engaged continuously in the visitor season, while access to specialist advice is notably limited. This disparity is accentuated by the applicant's prolonged preparation period, supported by substantial professional and financial resources, highlighting an imbalance that compromises effective participation.

Furthermore, the requirements set out in GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, mandate that those affected must have a realistic opportunity to engage meaningfully in decisions of such significance. The conditions under which the affected communities have been expected to respond fall short of these standards. It is therefore imperative that Ministers give careful consideration to these shortcomings in public participation when evaluating the representations submitted, recognising the impact these procedural inadequacies may have on the fairness and integrity of the site-selection process.

The Environmental Impact Assessment (EIA) submitted with this application 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.

1.1.602 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 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 acknowledges effects on designated landscapes within the Loch na Keal National Scenic Area, including Ulva and Staffa, but underestimates the significance of these impacts. Ulva, a community-owned island undergoing regeneration, relies fundamentally on its unspoilt seascape and setting for recovery; yet no specific assessment has been undertaken to evaluate the effects on this vulnerable community. Staffa, 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 impacts on National Scenic Area qualities. Despite accepting its panoramic maritime qualities, the applicant concludes that the scale of change at Staffa would be small and the effect not significant, a position that discounts the island's acknowledged sensitivity and cultural importance.

Further afield, the applicant assesses the Jura National Scenic Area, situated around 28 to 32 kilometres from the site, as having high sensitivity but attributes only medium to low magnitude effects. This moderation is justified by distance, apparent scale, and retention of landforms, notwithstanding the fact that the designation fundamentally rests on the wild, undeveloped character of its Atlantic outlook. Similarly, the Scarba, Lunga and Garvellachs National Scenic Area, at approximately 35 to 40 kilometres distance, is afforded the same treatment. Such assessments fail to fully account for the cumulative and landscape-scale impacts on these seaboard designated landscapes 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.

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.

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.

1.1.603 Personal Observations

In addition to the planning matters above, I am personally concerned because: This project will destroy the natural beauty of the area. It will be an eyesore, and will ruin the tranquility of what we currently have. It will reduce tourism and cause locals to financially suffer. The Orthodox monastery that is there is very significant to me as an Orthodox Christian, I believe that such a project is an offence against the monastery and my religion. The project will also destroy local wildlife and doing so would be a terrible disgrace on the international scale because of the unique environment and ecosystem. The project is also a waste of taxpayers money and the electricity produced will not be able to be used by the national grid. This project, if it goes ahead, will cause massive distrust in the authorities and will cause an appearance of corruption and will further bring the trope of politicians and council workers being payed out by corrupt businessmen.

Finally, I would also ask the Scottish Ministers to consider: If this project goes ahead, it will cause serious distrust in the government and in politicians. It would be such a shame if it went ahead and would not be good for the wider British community.

1.1.604 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 666
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.

1.1.605 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 applicant has relied upon NatureScot’s visualisation guidance in preparing the visual evidence for the assessment. This guidance explicitly recognises that printed visualisations are inherently limited in their ability to replicate the true scale perceived by a viewer in the field. Furthermore, wireline drawings, which are presented alongside panoramic photographic projections, share the same limitations

as the photographs they accompany. These drawings serve as technical renderings within the visualisation and do not function as independent tools to correct or enhance the photographic depiction.

Such technical and perceptual limitations underline the challenges in fully conveying the visual impact of a development through printed materials alone. While the visualisations provide a useful indication, they cannot substitute for the actual experience of viewing the site in situ, where scale and context are understood more comprehensively. Consequently, reliance solely on these visual materials should be approached with caution when assessing the proposal's visual effects.

While mitigation measures may address 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 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.

1.1.606 Cultural Landscape, Archaeology and Historic Environment

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

Historic Environment Scotland's methodology, as referenced by the applicant, mandates an evaluation focused on whether changes to setting affect the contribution it makes to the cultural significance of heritage assets, not merely an account of visual alterations. Crucially, it specifies that visual change should not be

equated directly with adverse impact. However, the applicant's assessment primarily describes visual change through factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, without explicitly assessing the integrity of setting itself.

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

The applicant's own baseline assessment acknowledges that the cultural significance of the affected heritage assets arises from a complex interplay of qualities, notably pilgrimage, arrival by sea, and movement through a living cultural landscape. It highlights the importance of the relationships between monuments, spirituality, and their surrounding landscape and seascape, emphasising that these are experienced dynamically through movement rather than from fixed viewpoints. Despite this recognition, Historic Environment Scotland's consultation responses—also recorded within the application—have requested additional viewpoints to ensure these broader experiential and cultural landscape qualities are adequately represented. This suggests that the applicant's assessment may not fully capture the wider cultural context and experiential dimensions that contribute to the heritage assets' significance. Therefore, further consideration is necessary to properly address these aspects in the heritage impact appraisal.

The 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 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.

1.1.607 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 practical consequence of the applicant's approach is a significant gap in understanding and mitigating the impacts of the proposal on island communities. Although the applicant's own consultants identified habitability as a potentially significant pathway for effects on these communities, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment conducted in Chapter 18 focuses primarily on regional port communities, leaving the island communities facing the development without an equivalent, place-based evaluation. Despite this omission, the assessment nonetheless concludes that these island communities are of low sensitivity to tourism effects, a conclusion that does not reflect the realities on the ground.

This generalised conclusion overlooks the particular nature of small island economies, which are not comparable to regional averages. These economies are often heavily concentrated in sectors directly dependent on the qualities that attract visitors, making them inherently more vulnerable to changes affecting tourism. Moreover, an increasing reliance on visitor numbers tends to deepen rather than reduce this sensitivity, as it intensifies dependence on those at-risk qualities. Therefore, the assertion of low sensitivity, reached without detailed, place-specific analysis, lacks evidential foundation and amounts to an unwarranted assumption. Without a robust, island-focused socio-economic assessment, the proposal risks underestimating the true impacts on these vulnerable communities.

The proposal 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.

1.1.608 Ecology, Biodiversity and Habitats Regulations

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

The applicant's submission includes a Without Prejudice Derogation Case 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 the applicant's recognition that adverse effects on the site's integrity cannot be definitively ruled out, thereby quantifying the potential impact on this protected species and habitat.

Such documentation is prepared precisely for circumstances where the possibility of a significant adverse effect exists, and their inclusion in the application is a notable feature. It demonstrates an awareness that mitigation alone may be insufficient and that derogation provisions may need to be engaged to permit the project's progression without contravening conservation objectives. This approach acknowledges the sensitive ecological status of the designated site and the need for compensatory measures.

However, it is important to note that the applicant's submission does not guarantee that Scottish Ministers will concur with the conclusions drawn regarding the absence of adverse effects. The very use of these Without Prejudice documents suggests that final determination remains open and that further scrutiny will be necessary. Given these considerations, the application should be approached with caution, ensuring

that any decision fully accounts for the potential risks to the protected site and the adequacy of the proposed derogation and compensation measures.

1.1.609 Cumulative and In-Combination Effects

The applicant's submission fails to comply with the requirements set out in GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the Environmental Impact Assessment Regulations concerning project splitting. Specifically, there is no adequate demonstration that the cumulative and in-combination effects of the proposal, nor the impacts of the project in its entirety, have been thoroughly identified or assessed. Furthermore, the approach to deferred works remains unaddressed in the application. It is therefore essential that the decision-making process explicitly considers these deferred elements to ensure full compliance with policy and regulatory obligations.

1.1.610 Effects on Local Area

There remains considerable uncertainty regarding the adequacy of the applicant's assessment of the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Although Islay and Colonsay lie in closest proximity to the proposed development—which extends over a 448 square kilometre area immediately north-west of Islay and west of Colonsay—the application primarily addresses Islay in terms of its potential as a direct project location. This approach neglects a thorough, place-based evaluation of the impacts on Islay as a distinct island community, particularly its Atlantic-facing settlements that confront the nearest edge of the development zone, leaving potential effects on their setting, local economy, and community life insufficiently explored.

The situation is no less concerning for Colonsay and Oronsay, where the seaward outlook is integral to daily life and faces directly towards the development array. Notably, the North Colonsay and Western Cliffs Special Protection Area lies along Colonsay's coastline and forms the focus of the applicant's derogation case and compensation proposals. This area hosts an internationally protected seabird population, and the application itself acknowledges that harm to this resource cannot be excluded, highlighting a degree of unresolved risk and impact. Such an admission underscores the need for a more comprehensive and transparent assessment of the environmental consequences.

Furthermore, Oronsay Priory, a scheduled monument of national importance situated within this community's area, also demands closer scrutiny. The identified gaps in the heritage assessment apply equally to the evaluation of its open maritime setting, which forms a critical part of its historic significance. Taken together, these considerations demonstrate that the current environmental and heritage impact evaluation does not convincingly address all relevant effects on these islands, thereby undermining the reliability of the overall assessment and warranting further detailed and place-specific analysis.

The applicant's assessment significantly underestimates the scale and 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.

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 significantly underestimates the impacts on important designated landscapes and vulnerable island communities, leading to inadequate protection of their natural and cultural qualities. Ulva, a community-owned island within the Loch na Keal National Scenic Area, is a small, re-establishing community whose recovery critically depends on the unspoilt seascape and setting at risk; yet, no assessment of effects on Ulva has been made. Similarly, Staffa, also within the Loch na Keal National Scenic Area and renowned as one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development area—beyond the 30 kilometre threshold NatureScot recommended for assessing effects on National Scenic Area qualities. Despite acknowledging the panoramic maritime qualities of Staffa, the applicant concludes that the scale of change would be small and the effect not significant, a judgement that appears to downplay potential harm. The Jura National Scenic Area, assessed as having high sensitivity at a distance of 28 to 32 kilometres, is attributed only medium to low magnitude effects, justified by distance and retained landforms, even though its designation is founded on the wild, undeveloped character of its Atlantic outlook. The Scarba, Lunga and the Garvellachs National Scenic Area, situated approximately 35 to 40 kilometres away, is subject to a similar assessment approach. Taken together, these assessments fail to adequately reflect the significance of effects on these designated landscapes and island communities, thereby undermining the safeguards necessary to maintain their distinctive natural and cultural attributes.

The applicant's assessment 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 the proposed development and whose economies and identities are closely tied to the seascape. For instance, Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by residents, faces the development site from the east. The finely balanced nature of Gigha's community and economy means that any changes in the seascape could have profound implications; yet, these have not been examined in the submitted assessment. Similarly,

Ardnamurchan Point, the most westerly point of the British mainland, offers panoramic views along the Hebridean seaboard which attract visitors throughout the peninsula. These seaward panoramas are precisely the type of receptor that the applicant's distance-based moderation approach fails to adequately address, as it diminishes the potential significance of visual and experiential effects at such key viewpoints. Furthermore, the west coast of Kintyre comprises a chain of communities whose outlook, character, and visitor economies are intimately defined by the open Atlantic seaboard looking towards Islay, Jura, and the surrounding waters. The Treshnish Isles, along with other small islands and mainland coasts in the vicinity with views towards the development, share this same position. Collectively, these receptors represent sensitive social and economic interests that are unaccounted for in the applicant's evaluation. This lack of assessment undermines the comprehensiveness and reliability of the overall environmental and socio-economic analysis, leaving a gap in understanding the full extent of the development's potential impacts on these mainland and island communities.

The applicant's 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.

1.1.611 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 667
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.

1.1.612 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 must be determined in accordance with Part 4 of the Marine (Scotland) Act 2010 and Scotland's National Marine Plan, as explicitly required by statute. The relevant policies within the National Marine Plan that govern this determination include, but are not limited to, General Policies GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts). Compliance with these policies is a mandatory component of the statutory assessment process for the application.

The evidence before the determining authority does not demonstrate compliance with these statutory requirements and relevant National Marine Plan policies. There are identified deficiencies and omissions in the application that conflict with the applicable legal and policy framework. In particular, the application fails to provide sound evidence as required by GEN 19 and paragraph 4.81, and does not adequately address cumulative impacts as mandated by GEN 21 and paragraph 4.85. Furthermore, the application does not satisfactorily engage with the requirements of GEN 18 concerning stakeholder engagement, nor does it sufficiently consider the implications for the historic environment, landscape, natural heritage, or co-existence with other marine users as set out in the respective policies.

Given these unresolved shortcomings and the absence of demonstrated compliance, the application is fundamentally deficient in meeting the statutory criteria. Such failures weigh decisively against the granting of consent under the Marine (Scotland) Act 2010 and the National Marine Plan. Therefore, the marine licence application should be refused.

The proposal fails to demonstrate compliance with the mitigation requirements set out in National Planning Framework 4, particularly in relation to biodiversity and natural places. Policy 3 (Biodiversity) and Policy 4 (Natural Places) require that developments avoid harm to ecological networks and enhance natural habitats. However, the submitted evidence does not show that adequate measures have been taken to prevent adverse impacts or to provide compensatory enhancements. This shortfall is critical given the statutory duties to protect biodiversity, and the absence of demonstrated mitigation weighs heavily against the proposal.

Furthermore, the application does not meet the standards required under Policy 7 (Historic Assets and Places). The Framework mandates that developments must conserve and, where appropriate, enhance the historic environment. The evidence reveals deficiencies in the assessment of impacts on historic assets, with omissions in the evaluation of potential harm and a lack of clear proposals to address these effects. This failure to comply with the policy and associated legislative requirements undermines the acceptability of the development in terms of heritage conservation.

Finally, the proposal does not satisfy the criteria of Policy 11 (Energy), which seeks to ensure that energy considerations are integrated into planning decisions in a

manner consistent with national objectives. The application lacks sufficient evidence to demonstrate that energy impacts have been properly assessed or that the development aligns with the Framework's energy policies. Given these unresolved conflicts with the applicable legal and policy framework, the proposal cannot be considered compliant. In accordance with the guidance that where compliance has not been demonstrated, these matters weigh against granting consent, 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 properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018. This statutory requirement obliges decision-makers to explicitly account for the unique needs and circumstances of island communities during the planning process. The submitted documentation does not demonstrate compliance with this duty, nor does it provide adequate evidence that the interests of island communities have been sufficiently identified, assessed, or given due weight. Such deficiencies and omissions constitute a clear conflict with the applicable legal and policy framework established by the Islands (Scotland) Act 2018. In accordance with established principles, where compliance with this statutory duty is not demonstrated, these shortcomings must weigh against the granting of planning consent. Therefore, on the basis of the failure to properly consider and give due weight to island communities' interests as required by the Islands (Scotland) Act 2018, the proposal should be refused.

There remains significant uncertainty as to whether the applicant has fulfilled the fundamental responsibility to demonstrate compliance with all relevant legal and policy requirements. The evidential burden rests squarely on the applicant to provide robust, objective, and proportionate evidence confirming that every applicable statutory duty, planning policy, and environmental assessment requirement has been satisfied. In this case, the applicant has failed to meet this burden, leaving critical gaps in the evidence base that prevent a clear and confident determination that the proposal accords with the full spectrum of legal and policy obligations.

Moreover, where compliance has not been demonstrated, or where the submitted evidence reveals deficiencies, omissions, or conflicts with the applicable legal and

policy framework, these shortcomings must weigh decisively against the granting of consent. The absence of conclusive proof of compliance undermines the legitimacy of the application and precludes the necessary assurance that the proposal would not contravene statutory or policy safeguards. On this basis, the application should be refused.

1.1.613 Conflict with National Planning Framework 4 and the Development Plan

The practical consequence of approving the proposal is that it would fail to comply with the impact criteria set out in NPF4 Policy 11, thereby undermining the policy's intended support for renewable energy development. While Policy 11 endorses such projects, this endorsement is conditional upon meeting specific impact requirements, including those concerning communities, landscapes, seascapes, and other environmental receptors.

In this case, the proposal would result in significant adverse effects on nationally designated landscapes and seascapes, contrary to Policy 11(d) and 11(e). Furthermore, the evidence submitted does not demonstrate that the cultural significance of scheduled monuments and their settings would be adequately protected, as required by Policy 11. The safeguarding of island communities has also not been convincingly established, raising concerns under Policy 11(c). Additionally, the ecological assessments have not shown that the necessary tests can be satisfied, casting doubt on the proposal's compliance with environmental protection standards.

Given these substantive conflicts with the impact criteria of NPF4 Policy 11, the proposal cannot be supported. The policy's framework clearly requires that renewable energy development must not override protections for sensitive landscapes, heritage assets, communities, and ecology. On the evidence before the planning authority, the proposal falls short of these essential requirements and should therefore be refused.

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

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

Lastly, the ecological assessments submitted fail to show compliance with the necessary biodiversity tests outlined in Policy 3. Without clear evidence that these

ecological standards can be met, the proposal cannot be deemed consistent with NPF4's commitment to biodiversity conservation. Taken together, these shortcomings establish that the proposal is incompatible with multiple policies designed to protect designated assets of national importance.

The proposal 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.

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

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

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

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

However, the applicant has failed to demonstrate that the conclusions reached regarding the scale of these accepted effects are consistent with the methodology it employs. Moreover, the applicant has not provided sufficient evidence to confirm compliance with the policies protecting nationally important landscapes and seascapes. This shortfall indicates a lack of robust justification for the proposal's

acceptability under the relevant planning framework, thereby undermining confidence that the development would satisfactorily safeguard the identified landscape and seascape interests as required by national policy.

1.1.615 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 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 relying on the existing landscape assessment is that any understatement of landscape effects directly compromises the accuracy and reliability of the heritage impact conclusions derived from it. The assessment of heritage impacts is not an isolated exercise; it is fundamentally dependent on the

landscape analysis that precedes it. If the landscape effects are understated, as has been demonstrated, then the heritage conclusions that are built upon this flawed foundation must also be considered understated and potentially misleading. This interdependence means that deficiencies in the landscape assessment undermine the overall credibility of the heritage impact findings. Consequently, without a robust and accurate landscape assessment, the heritage conclusions cannot be relied upon to fully reflect the true extent of impacts, and this must be taken into account in the decision-making process.

The 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.

1.1.616 Effects on Island Communities, Tourism and the Local Economy

There is considerable uncertainty regarding the potential impacts of the proposed development on the island communities in question, particularly given their unique economic and social contexts. These communities rely heavily on a visitor economy that is intimately connected to specific environmental and cultural qualities. The applicant's own baseline assessments identify these attributes as landscape, seascape, cultural heritage, tranquillity and remoteness. Any alteration to these qualities, therefore, poses a substantial risk to the fundamental appeal that attracts visitors to the islands.

The significance of these qualities extends beyond mere aesthetics; they form the cornerstone of the local economy. The island communities depend to an exceptional degree on visitors drawn by these distinctive features. If the proposal were to diminish the integrity or experience of these characteristics, the resulting effect would

be a direct strike at the economic base of these communities. This, in turn, threatens not only business viability but also the maintenance of essential local services, population retention and the long-term sustainability of community life.

Given the centrality of the visitor-attracted qualities to both economic and social sustainability, any development that risks impacting them must be subject to rigorous scrutiny. The evidence indicates a clear and direct link between these qualities and the ongoing viability of the island communities. Accordingly, the potential for adverse effects should weigh heavily in the consideration of the proposal, underscoring the need for a cautious and comprehensive assessment before any approval is granted.

The applicant's 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 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.

1.1.617 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 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's evidence clearly establishes the rigorous legal framework established by the Habitats Regulations, which governs any development proposals potentially affecting protected habitats and species. Consent for such developments can only be granted if the competent authority has unequivocally ascertained that the proposal will not adversely affect the integrity of the protected site, or if the strict derogation tests are satisfied. This places a very high evidential standard on the applicant, requiring that no reasonable scientific doubt remains regarding the absence of adverse effects. Importantly, the responsibility to demonstrate compliance with these statutory tests lies firmly with the applicant. Furthermore, mitigation measures, compensation proposals, and commitments to future monitoring, while relevant, cannot alone satisfy the statutory requirements or substitute for the necessary scientific certainty.

This stringent legal requirement is supported and reinforced by the broader policy framework encompassing GEN 9 and GEN 13 of the National Marine Plan,

alongside Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). These policies collectively emphasise the imperative to safeguard protected habitats and species by ensuring that developments conform fully to the Habitats Regulations' standards before consent is granted. Consequently, any planning decision must be grounded in robust scientific evidence demonstrating no adverse effects on site integrity, reflecting the fundamental principle that environmental protection in these contexts cannot be compromised or presumed through future actions. This framework underscores the necessity for the competent authority to exercise rigorous scrutiny and for applicants to meet their substantial evidential burden in full.

The applicant has not demonstrated that the statutory tests designed to protect internationally important habitats and species can be satisfied. This conclusion arises directly from the evidence submitted, including the applicant's own derogation documents, which collectively reveal an absence of the requisite certainty regarding compliance with these legal requirements. Without clear and convincing evidence that these statutory tests are met, the application fails to fulfil the legal obligations necessary to safeguard internationally significant ecological features. Consequently, this undermines the justification for granting consent, as the statutory protections remain unaddressed and the potential for adverse impacts on protected habitats and species cannot be adequately ruled out.

1.1.618 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 practical consequence of relying on flawed baseline assessments is that the cumulative impact assessment is rendered unreliable and systematically underestimates the true combined effects of development proposals. This is because the cumulative assessments are contingent on conclusions drawn elsewhere in the Environmental Impact Assessment. Specifically, where the initial evaluations of landscape, heritage, and socio-economic effects have understated impacts—as detailed previously—the cumulative assessment similarly adopts this diminished baseline. As a result, the aggregate effects of the proposal under consideration, when combined with other existing, consented, and foreseeable developments, are

correspondingly understated. This fundamental dependency undermines confidence in the cumulative impact conclusions and suggests that the full extent of combined development effects has not been appropriately accounted for.

The assessment identifies a clear failure to comply with established policy and regulatory requirements concerning project splitting and the evaluation of cumulative effects. Specifically, the applicant has not satisfactorily demonstrated that the cumulative and in-combination impacts of the proposal, nor the effects of the project in its entirety, have been reliably identified and assessed. This shortfall engages provisions 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 and the Environmental Impact Assessment Regulations.

This omission is significant because it undermines the integrity of the environmental assessment process and the policy framework designed to ensure comprehensive consideration of all relevant effects. Without a clear and thorough appraisal of deferred works and their potential interactions with the proposed development, the decision-making process is compromised. The absence of explicit treatment of these elements means that the proposal cannot be considered fully compliant with the requirements intended to prevent project splitting and to address cumulative effects adequately.

In light of these findings, it is essential that the determination explicitly addresses the treatment of deferred works and ensures a rigorous assessment of the project as a whole. Only through such comprehensive consideration can the planning authority fulfil its statutory obligations and uphold the principles of sustainable development enshrined in national policy and legislation. Consequently, the application should not be approved until these deficiencies are satisfactorily remedied.

1.1.619 Public Engagement, Site Selection and Environmental Information

The applicant places significant weight on the site-selection process, which renders the quality of public participation within that process directly material to the decision. However, deficiencies in public participation identified during the plan and site-selection stages have persisted into the application stage. The application itself comprises many thousands of pages of technical material, submitted during the busiest months of the year for island communities. This period coincides with the visitor season, when local residents are engaged continuously in work and specialist advice is least accessible. In contrast, the applicant has had years to prepare its case, supported by substantial professional and financial resources.

The requirements set out in GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, mandate that those affected must be afforded a realistic opportunity to participate in decisions of such magnitude. The circumstances under which the affected communities have been expected to respond fall short of this standard. This shortfall undermines the legitimacy of the consultation process and should be given careful consideration by the Scottish Ministers when evaluating the representations submitted.

The practical consequence of the 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.

1.1.620 Effects on Local Area

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

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

effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby weakening the overall robustness of the environmental and heritage impact evaluation.

The applicant's assessment significantly underestimates the scale and importance of visual, community, and heritage impacts on Iona, leading to an incomplete evaluation of environmental and social consequences. The Coastal Character assessment identifies the Sound of Iona as having high sensitivity, with a direct orientation towards the development area and extensive visibility. The geographical extent of change is large, with turbines visible across approximately 39 degrees of the horizon at a distance of about 21 kilometres, producing a moderate and significant overall effect. Similarly, the West Coast of Iona is highly sensitive with widespread visibility, and the applicant acknowledges significant effects for residents and visitors throughout much of the island, including at Dùn Ì, Iona's highest point.

Iona's monastic landscape, comprising the Abbey, the Nunnery, and the high crosses, holds heritage of international importance. The applicant's baseline recognises the significance of pilgrimage, arrival by sea, and movement through the landscape to this heritage. Historic Environment Scotland requested additional viewpoints, including one from the ferry crossing itself, but no visualisation has been provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, a notable omission given the heritage sensitivity. Community concerns are also profound: a household consultation revealed that 92 per cent of respondents on Iona object to the proposal. Despite the applicant's consultants identifying habitability as a potential pathway of effect on this community, no assessment of this factor has been undertaken.

To contextualise the perceived scale of visual impact, the largest turbines would be approximately 194 metres taller than Ben Hynish on Tiree, a familiar landmark standing 141 metres high and visible from Iona at about 33 kilometres. The turbines would be two-thirds of that distance away yet dominate the skyline. This comparison underscores the significant underestimation in the applicant's visual impact assessment.

In conclusion, the applicant's evaluation fails to fully capture the extensive and significant effects on Iona's sensitive landscapes, heritage assets, and community wellbeing, thereby compromising the accuracy and reliability of the environmental and social impact assessment.

The applicant's assessment acknowledges 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 effects on designated landscapes within the Loch na Keal National Scenic Area, including Ulva and Staffa, but underestimates the significance of these impacts. Ulva, a community-owned island undergoing regeneration, relies fundamentally on its unspoilt seascape and setting for recovery; yet no specific assessment has been undertaken to evaluate the effects on this vulnerable community. Staffa, 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 impacts on National Scenic Area qualities. Despite accepting its panoramic maritime qualities, the applicant concludes that the scale of change at Staffa would be small and the effect not significant, a position that discounts the island's acknowledged sensitivity and cultural importance.

Further afield, the applicant assesses the Jura National Scenic Area, situated around 28 to 32 kilometres from the site, as having high sensitivity but attributes only medium to low magnitude effects. This moderation is justified by distance, apparent scale, and retention of landforms, notwithstanding the fact that the designation fundamentally rests on the wild, undeveloped character of its Atlantic outlook. Similarly, the Scarba, Lunga and Garvellachs National Scenic Area, at approximately 35 to 40 kilometres distance, is afforded the same treatment. Such assessments fail to fully account for the cumulative and landscape-scale impacts on these seaboard designated landscapes and 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 does not address the potential effects on several mainland and island communities that have direct views of the proposed development and possess a strong economic reliance on the seascape. Notably, Gigha, a community-owned island renowned nationally for its regeneration after purchase by its residents, faces the development waters from the east; yet the assessment omits any examination of the impact on its delicate community balance and local economy. This omission raises questions about the comprehensiveness of the evaluation regarding the social and economic dimensions of the proposal.

Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers expansive panoramic views along the Hebridean coast that attract visitors throughout the peninsula. These seaward vistas are precisely the type of receptor that the applicant's distance-based moderation approach—criticised in this objection—seeks to downplay. The significance of these views to local tourism and community identity warrants a more thorough and site-specific consideration than has been provided.

Furthermore, the west coast of Kintyre comprises a series of communities whose character and visitor economy are intimately connected to the open Atlantic seaboard facing Islay, Jura, and adjacent waters. The Treshnish Isles and surrounding smaller islands, alongside mainland coasts with outlooks towards the development site, share this sensitive position. The failure to assess the potential effects on these interconnected seascape receptors undermines the robustness of the overall landscape and socio-economic impact appraisal. In light of these gaps, a more comprehensive and inclusive assessment is essential to fully understand the proposal's implications for the wider coastal and island communities.

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.

1.1.621 Personal Observations

In addition to the planning matters above, I am personally concerned because: It will forever destroy significant natural resources and amenities including fishing, tourism, quality of life and much more. The scale is disproportionately large in comparison to the immediate communities and offers them no benefits that would in any way outweigh the disadvantages. Further, it is dependent on and for the benefit of foreign investors and should not be permitted.

Based on my own local knowledge, I also wish to highlight that: All of the environmental, landscape, wildlife and community deserve full consideration and protection from such destructive and devastating developments.

Finally, I would also ask the Scottish Ministers to consider: Please STOP selling our seas and land to foreign developers and investors and please be transparent about their actual purpose. Just because something provides renewable energy doesn’t mean it is right! These developments have alternatives but once there they damage is done and can’t easily be undone.

1.1.622 Further Comments

Democracy is at real risk of extinction here. Time to start genuinely listening to your electorate. You are here to serve us and do what is democratically determined - not to overrule the electorate when you choose.

1.1.623 Summary

The proposal for the MachairWind Offshore Wind Farm fails to meet the requirements set out in 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, independent analysis of the submitted documents reveals that these impacts have been understated. Crucially, the necessary heritage assessment has not been completed, and while the effects on island communities were identified, they have never been properly evaluated. Additionally, the ecological criteria required to justify the development 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 substantial shortcomings, it is respectfully submitted that consent for the MachairWind Offshore Wind Farm, along with the associated marine licence, should be refused. Should the Scottish Ministers be inclined not to refuse consent outright, it is urged that they require the submission of further environmental information and enhanced visualisation materials. Moreover, it is requested that the applications should only be determined following a public inquiry, enabling a thorough examination of all matters raised in this objection. Regardless of the outcome, it is essential that the Ministers provide explicit and reasoned conclusions relating to the effects on cultural heritage and the impacted island communities within their 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 668
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.

1.1.624 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 mandates that the applicant must have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant is required to take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The evidence before the determining authority does not satisfactorily show that these requirements have been met.

Given that the Scottish Ministers are also required to have regard to these statutory duties in determining the application, the absence of demonstrated compliance constitutes a significant procedural and substantive deficiency. Where such compliance has not been established, or where evidence reveals omissions or conflicts with the applicable legal and policy framework, these factors must 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 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 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; instead, it reveals deficiencies and omissions that conflict with the applicable legal and policy framework. Such failures weigh decisively against the granting of consent. Therefore, on the basis of non-compliance with NPF4 and associated statutory obligations, the proposal should be refused.

The proposal fails to demonstrate any proper consideration or weighting of the interests of island communities as mandated by the Islands (Scotland) Act 2018. This statutory requirement explicitly obliges decision-makers to ensure that the interests of island communities are identified, assessed, and given due weight throughout the planning process. The absence of such evidence in the application materials constitutes a fundamental procedural and substantive deficiency.

The Islands (Scotland) Act 2018 establishes a clear legal framework that must be adhered to in all relevant planning decisions. Where compliance with this framework is not demonstrated, or where the evidence reveals omissions or conflicts with the statutory requirements, these shortcomings must weigh decisively against the granting of consent. In this case, the proposal's failure to address the statutory duty to consider island communities' interests represents a direct conflict with the applicable legal and policy framework.

Given the statutory imperative and the absence of any evidence that the proposal has met this requirement, the application cannot be regarded as compliant with the

Islands (Scotland) Act 2018. This failure is a critical flaw that undermines the legitimacy of the decision-making process and justifies refusal of consent. Accordingly, the proposal should be rejected on the basis that it does not properly consider or give due weight to the interests of island communities as required by law.

1.1.625 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 practical consequence of the proposal as submitted is that it would result in significant adverse effects on nationally important designated assets, undermining the protective aims of several key policies within NPF4. Specifically, the proposal would adversely impact National Scenic Areas and other nationally important landscapes, thereby failing to safeguard the qualities for which these areas have been designated. This outcome is at odds with the requirements of Policy 11 and its associated provisions, notably Policies 4(c) and 4(d), which collectively seek to prevent significant harm to such valued landscapes.

Moreover, the proposal does not adequately demonstrate how the cultural significance of scheduled monuments and their settings would be preserved. Policy 7, including its provisions under 7(h) concerning scheduled monuments and 7(c) and 7(d) relating to the setting of historic assets, demands robust protection of heritage interests. The evidence presented falls short of meeting these standards, raising concerns that the proposal would detrimentally affect the integrity and context of these nationally important heritage assets. This failure represents a clear conflict with the established policy framework aimed at conserving the historic environment.

In addition, the proposal does not satisfy the ecological requirements set out in Policy 3 on biodiversity, nor does it provide sufficient assurance that island communities, which are recognised as sensitive receptors, would be safeguarded. Taken together, these shortcomings demonstrate that the proposal is incompatible with multiple policies within NPF4 designed to protect designated landscapes, heritage assets, and biodiversity. As such, the proposal should not be supported in

its current form given the significant and demonstrable conflicts with these critical national policy objectives.

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.

1.1.626 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 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 when assessed against the requirements of key planning policies safeguarding landscape and seascape interests. Specifically, the applicant has not shown that its conclusions regarding the scale of the acknowledged effects align with its own assessment methodology. Consequently, there is no clear evidence that the proposal complies with the protections afforded to nationally important landscapes and seascapes. These shortcomings engage the provisions of National Planning Framework 4, notably Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. Taken together, this indicates that the proposal does not meet the necessary policy standards intended to safeguard these valued environmental assets.

1.1.627 Cultural Landscape, Archaeology and Historic Environment

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

1.1.628 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.

1.1.629 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 addressing the guillemot population within the North Colonsay and Western Cliffs Special Protection Area. These documents are typically prepared in circumstances where it is not possible to exclude an adverse effect on the integrity of a protected site. The very inclusion of such materials within the application highlights the applicant's recognition of potential impacts on designated environmental interests.

It is important to note that the submission of these derogation and compensation documents indicates a precautionary approach by the applicant, acknowledging that the proposed development may affect the protected guillemot population. By providing these plans, the applicant seeks to demonstrate a commitment to mitigating any such impacts should the competent authority, in this case the Scottish Ministers, determine that an adverse effect on site integrity cannot be ruled out. This approach reflects an understanding that the Scottish Ministers may reach a different conclusion regarding the potential for harm than the applicant has presented.

The presence of these documents as part of the application is therefore a significant feature, as it signals preparedness to address and manage any identified adverse effects through derogation provisions and compensatory measures. This submission aims to ensure that, in the event of an adverse effect being confirmed, appropriate steps will be taken to protect the guillemot population and maintain the overall integrity of the North Colonsay and Western Cliffs Special Protection Area.

The 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.

1.1.630 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.

1.1.631 Public Engagement, Site Selection and Environmental Information

The practical consequence of the deficiencies identified in the Environmental Impact Assessment (EIA) is that the Scottish Ministers 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.

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

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

Community concerns further underscore the inadequacy of the assessment. A household consultation revealed that 92 per cent of respondents on Iona object to the proposal, yet the applicant's consultants did not assess habitability, despite identifying it as a potential pathway of effect. The perceived scale of the turbines can

be better appreciated by comparison with a familiar landmark: Ben Hynish on Tiree, which stands at 141 metres high and is visible from Iona at approximately 33 kilometres. The largest turbines would exceed Ben Hynish by around 194 metres while situated at roughly two-thirds of that distance, highlighting the disproportionate visual intrusion. Collectively, these factors demonstrate that the applicant's evaluation fails to capture the true extent of impacts on Iona, warranting a more rigorous and comprehensive reassessment.

The applicant's assessment recognises 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 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 while attributing a Low magnitude of change. This evaluation significantly understates the true scale of impact on Tiree's landscape character. Tiree is an exceptionally low-lying island, its entire character defined by the dominance of sea and sky, with its highest point, Ben Hynish, rising only 141 metres. The introduction of turbines up to 335 metres in height would create vertical structures unprecedented in Tiree's seascape. Given the island's reliance on an open oceanic horizon as a defining feature, the conclusion of a Low magnitude of change for such an exposed and sensitive receptor is not credible. This underestimation leads to an unreliable overall evaluation of effects on Tiree's distinctive landscape, warranting a reconsideration of the assessment's findings.

The applicant's assessment fails to consider significant effects on mainland and island communities that have direct visual and economic connections to the seascape surrounding the proposed development. Notably, Gigha, a community-owned island emblematic of island regeneration, faces the development site from the east, yet the potential 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 to the entire peninsula; these seaward vistas, integral to the local visitor economy, are precisely the receptors subject to the questionable distance-based impact moderation employed by the applicant. Furthermore, the chain of communities along the west coast of Kintyre, whose character and tourism rely on the open Atlantic seaboard views toward Islay, Jura, and adjacent waters, are equally overlooked. The Treshnish Isles and other small islands and mainland coasts with sightlines toward the development area share this unassessed exposure. In sum, the omission of these receptor communities compromises the thoroughness and reliability of the applicant's environmental and socio-economic assessment. This gap must be addressed to ensure a comprehensive understanding of the development's full range of effects.

1.1.633 Personal Observations

Based on my own local knowledge, I also wish to highlight that: The area which will be affected is an area of outstanding beauty and should be a protected area of marine scientific importance. The proposed development will severely harm both the marine life and the wonderful beauty of the islands and sea.

Finally, I would also ask the Scottish Ministers to consider: Such a development, as the one under consideration, will adversely affect the island communities and nature.

1.1.634 Further Comments

It would be a crime against nature and humanity to give permission for the gigantic and unwanted proposed development. Please do not let it progress any further.

1.1.635 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 669
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, which encompass 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 correspondence be recorded as an objection, that I be officially registered as an objector, and that I receive notification of the final determination of these applications.

The proposals envisage the development of an offshore wind farm with an installed capacity of approximately 2 gigawatts. This would involve the installation of between 91 and 144 turbines, each with blade tips reaching up to 335 metres in height. The project site lies within a Windfarm Development Area spanning some 448 square kilometres of marine space situated to the north-west of Islay and to the west of Colonsay. The location is approximately 21 kilometres from the island of Iona and lies in proximity to the islands and coastal settlements of the southern Hebrides.

The basis for this objection is founded on planning and environmental considerations framed by the statutory and policy context applicable to these proposals. It is incumbent upon the applicant to provide compelling and sufficient evidence demonstrating that all relevant statutory tests and policy requirements have been met. The onus is not on objectors to disprove the application but rather on the applicant to discharge this burden of proof. In my assessment, the applicant has failed to meet these obligations satisfactorily. Consequently, I contend that consent for both the section 36 application and the marine licence should be withheld.

1.1.636 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. Schedule 9 explicitly requires the applicant to have regard to the desirability of preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, 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 before the determining authority does not establish that these requirements have been sufficiently addressed or fulfilled in the application documentation.

Given that the Scottish Ministers are also required to have regard to these statutory duties when determining the application, the absence of demonstrated compliance constitutes a significant procedural and substantive deficiency. Where compliance 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. On this basis, the application should be refused as it fails to meet the mandatory statutory criteria 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 (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), particularly 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 Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy), yet the submitted evidence does not establish adherence to these policies.

Specifically, the application lacks sufficient evidence to confirm that biodiversity impacts have been adequately assessed or mitigated in accordance with Policy 3. Similarly, the protection and enhancement of natural places required by Policy 4 have not been satisfactorily addressed. The proposal also fails to demonstrate that historic assets and places will be preserved or appropriately considered, contrary to the requirements of Policy 7. Furthermore, compliance with Policy 11 on energy, including considerations of sustainable energy use and efficiency, has not been evidenced.

Where compliance with these policies has not been demonstrated, or where deficiencies, omissions, or conflicts with the applicable legal and policy framework exist, these matters weigh against the granting of consent. Given the absence of demonstrated compliance with key NPF4 policies, the proposal does not meet the necessary planning requirements and should be refused.

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 applicant’s submission acknowledges the statutory requirement under the Islands (Scotland) Act 2018 that the interests of island communities must be considered and given due weight in the decision-making process. This legislative framework is clear in mandating that any proposal affecting island communities must demonstrate compliance by thoroughly addressing and integrating those interests into the planning assessment.

However, the evidence before the determining authority reveals that this proposal fails to demonstrate such compliance. There are notable deficiencies and omissions in the consideration of island community interests, with no substantive evaluation or weighting of these factors apparent in the application documentation. This lack of proper assessment constitutes a failure to meet the statutory obligations set out in the Islands (Scotland) Act 2018.

Given that compliance with the Islands (Scotland) Act 2018 has not been demonstrated, and the evidence identifies clear shortcomings in addressing the interests of island communities, these matters must weigh against the granting of planning consent. The proposal’s failure to properly consider and give due weight to island community interests is a material planning concern that should result in refusal.

The applicant has failed to discharge the fundamental responsibility to demonstrate compliance with all relevant statutory duties, planning policies, and environmental assessment requirements through robust, objective, and proportionate evidence. This evidential burden is a prerequisite for the lawful consideration of the proposal and has not been met in this case.

The absence of such demonstration, coupled with identified deficiencies and omissions in the submitted evidence, directly conflicts with the applicable legal and policy framework. These shortcomings undermine the integrity of the planning process and preclude a lawful grant of consent.

Accordingly, in accordance with established principles, the unresolved evidential gaps and conflicts must weigh decisively against the approval of this application. The proposal cannot be considered compliant or acceptable without the applicant first fulfilling their clear and unequivocal evidential obligations.

1.1.637 Conflict with National Planning Framework 4 and the Development Plan

While NPF4 Policy 11 endorses renewable energy development, this support is expressly conditional upon compliance with the policy's impact criteria, notably those concerning effects on communities, landscapes, seascapes, and other sensitive receptors as outlined in subsections (c), (d), and (e). The proposal under consideration fails to meet these essential criteria, as the adverse impacts it would generate cannot be effectively mitigated to the standard required by the policy. Unlike proposals that demonstrate robust measures to safeguard cultural heritage, ecological integrity, and community well-being, this development lacks convincing evidence of sufficient mitigation to offset its significant negative effects.

Specifically, the proposal would result in substantial harm to nationally designated landscapes and seascapes, undermining their value and character. Furthermore, there is an absence of demonstrated protection for the cultural significance of scheduled monuments and their settings, raising serious concerns about heritage preservation. The proposal also falls short of ensuring the safeguarding of island communities, a key consideration under Policy 11. Finally, the ecological assessments submitted do not establish that the necessary environmental tests can be met, leaving unresolved risks to biodiversity. Taken together, these deficiencies amount to a clear conflict with the impact criteria of NPF4 Policy 11, thereby undermining the policy's intended support for renewable energy development in this instance.

The proposal 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.

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.

1.1.638 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.

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

The 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.

1.1.639 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of the heritage impacts fails to comply fully with the required methodology, thereby undermining the reliability of its conclusions regarding the integrity of setting. Although the applicant adopts Historic Environment Scotland's recognised methodology for assessing effects on the setting of historic assets—a methodology developed and refined through consultation with Historic Environment Scotland—this approach necessitates more than a description of visual changes. It requires a thorough evaluation of whether alterations to setting affect the contribution that setting makes to the cultural significance of the asset, and crucially, whether the integrity of that setting is adequately retained. Importantly, the methodology explicitly states that visual change should not be directly equated with adverse impact.

A published Methodological Audit, prepared in support of community objections and based solely on the applicant's Appendix 14.3, confirms that while the operational assessment identifies relevant heritage attributes, it does not demonstrate how the integrity of setting has been evaluated in accordance with the applicant's own adopted methodology. The assessment focuses on describing visual elements such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, before concluding that the integrity of setting remains intact. However, the essential evaluative step required by the methodology—demonstrating how these visual factors influence the cultural significance and integrity of setting—is absent in all the examined worked examples. This omission calls into question the robustness of the assessment's findings.

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 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 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.

1.1.640 Effects on Island Communities, Tourism and the Local Economy

While mitigation measures may be proposed to address certain environmental or visual impacts of the development, it is imperative to recognise that such measures cannot fully preserve the essential qualities that underpin the appeal of these island communities. The applicant’s own baseline assessments identify key attributes—landscape, seascape, cultural heritage, tranquillity and remoteness—that are integral to the visitor experience. Any diminution of these qualities, even if partially mitigated, risks undermining the very characteristics that attract visitors in the first place.

This dependency on visitors is of exceptional significance for the island communities affected by the proposal. These communities rely heavily on visitor-generated economic activity, and the erosion of their landscape and cultural assets would directly impact their economic base. The consequent effects would extend beyond tourism to threaten local services, population stability and the broader social sustainability of the islands. Therefore, the proposal presents a fundamental threat to the long-term viability of these communities, as it jeopardises the qualities that sustain both their economies and their social fabric.

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

sensitivity to tourism-related effects, a finding that lacks the rigour of place-based evidence.

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

The proposal fails to 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.

1.1.641 Ecology, Biodiversity and Habitats Regulations

The proposed development presents a scale of construction, operation, and decommissioning activity that would extend over several decades within an ecologically sensitive marine environment. Mitigation measures for such large-scale projects are typically designed to minimise disturbance to local ecosystems; however, the presence of Priority Marine Features and Annex I habitats within the development area itself indicates a heightened vulnerability. Surrounding waters are known to support important populations of seabirds, marine mammals, and basking sharks, all of which are species that require careful consideration due to their protected or conservation status.

Given this context, the potential for significant adverse environmental effects arising from the development cannot be discounted. The extensive duration and intensity of the proposed activities may lead to habitat degradation and disturbance to protected species, challenging the effectiveness of standard mitigation strategies. Therefore, the ecological importance and sensitivity of the site, as well as the surrounding marine environment, warrant rigorous assessment and cautious decision-making to ensure that any impacts are thoroughly understood and appropriately managed.

The applicant's submission of 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's evidence clearly establishes the rigorous legal framework established by the Habitats Regulations, which governs any development proposals potentially affecting protected habitats and species. Consent for such developments can only be granted if the competent authority has unequivocally ascertained that the proposal will not adversely affect the integrity of the protected site, or if the strict derogation tests are satisfied. This places a very high evidential standard on the applicant, requiring that no reasonable scientific doubt remains regarding the absence of adverse effects. Importantly, the responsibility to demonstrate compliance with these statutory tests lies firmly with the applicant. Furthermore, mitigation measures, compensation proposals, and commitments to future monitoring, while relevant, cannot alone satisfy the statutory requirements or substitute for the necessary scientific certainty.

This stringent legal requirement is supported and reinforced by the broader policy framework encompassing GEN 9 and GEN 13 of the National Marine Plan, alongside Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4 (NPF4). These policies collectively emphasise the imperative to safeguard protected habitats and species by ensuring that developments conform fully to the Habitats Regulations' standards before consent is granted. Consequently, any planning decision must be grounded in robust scientific evidence demonstrating no adverse effects on site integrity, reflecting the fundamental principle that environmental protection in these contexts cannot be compromised or presumed through future actions. This framework underscores the necessity for the competent authority to

exercise rigorous scrutiny and for applicants to meet their substantial evidential burden in full.

The applicant 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.

1.1.642 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 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 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.

1.1.643 Public Engagement, Site Selection and Environmental Information

There is significant uncertainty regarding whether the consultation process associated with this application has met the required standards of effective public participation, thereby raising concerns about the legitimacy of the site-selection process. The applicant urges Scottish Ministers to place considerable weight on the site-selection process; however, this depends fundamentally on the quality of public engagement throughout. Evidence indicates that deficiencies in participation at both the plan and site-selection stages have persisted into the application stage. The application itself comprises many thousands of pages of technical material, yet the consultation period coincided with the busiest months of the year for island communities, when residents are fully occupied by the visitor season and specialist advice is least accessible. Meanwhile, the applicant has had years, alongside substantial professional and financial resources, to prepare its case. Moreover, GEN 18 of the National Marine Plan, together with the principles of effective public participation enshrined in the Aarhus Convention, require that affected communities must have a realistic opportunity to engage in decisions of this scale. The conditions under which these communities have been expected to respond fall short of this standard. Ministers are therefore respectfully urged to bear this firmly in mind when considering the representations made.

The Environmental Impact Assessment submitted with the application fails to provide sufficient information for the Scottish Ministers to make a fully informed decision. While it identifies potential pathways to significant environmental effects across multiple topics, the assessment does not investigate these impacts comprehensively. For example, the landscape assessment employs a distance pattern not supported by its own methodology, the heritage assessment neglects to apply its established integrity test, and the socio-economic assessment omits place-based analysis relevant to the affected islands. Furthermore, the application frequently relies on future assessments, post-consent plans, ongoing monitoring, and additional

approvals, none of which satisfy the EIA Regulations' requirement that likely significant effects be thoroughly understood prior to determination. The Scottish Ministers must base their decision on the evidence currently before them, not on the expectation that unresolved issues will be addressed satisfactorily at a later stage. Consequently, the applicant has not demonstrated that the environmental information submitted is adequate for the purposes of determination.

1.1.644 Effects on Local Area

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 practical consequence of the applicant's assessment is a significant underestimation of the visual and community impacts on Iona, which undermines the overall 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 and extensive visibility across a large geographical extent, approximately 21 kilometres. Turbines would span around 39 degrees of the horizon, affecting the ferry crossing between Fionnphort and Iona, a critical point of arrival. Furthermore, the West Coast of Iona is similarly highly sensitive with widespread visibility, and the applicant acknowledges significant effects for residents and visitors across much of the island, including at its highest point, Dùn Ì. Despite this, the assessment fails to account for habitability impacts on the community, a pathway recognised by the applicant's own consultants but never

actually assessed. This omission is particularly concerning given that 92 per cent of respondents to a household consultation on Iona object to the proposal.

The heritage impacts on Iona are also understated, particularly regarding its internationally important monastic landscape, which includes the Abbey, the Nunnery, and the high crosses. The applicant's baseline rightly identifies the significance of pilgrimage, arrival by sea, and movement through the landscape. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing, yet no visualisation has been provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, a key vantage point. The scale of the turbines relative to familiar landmarks further illustrates the extent of visual intrusion: Ben Hynish on Tiree, standing at 141 metres and visible from Iona at about 33 kilometres, would be overshadowed by the largest turbines by approximately 194 metres at roughly two-thirds of that distance. This comparison highlights the disproportionate scale of the development's visual effects, which the applicant's assessment does not adequately address.

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

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

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

be revisited to ensure a more accurate and proportionate recognition of the effects upon Tiree’s unique seascape.

The applicant’s assessment has 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 applies a distance-based approach that systematically moderates and discounts effects beyond approximately 20 kilometres from the development site. This methodology contrasts with the need for thorough place-based assessment to fully understand the significance of impacts on sensitive receptors. While mitigation measures closer to the site are carefully considered, the attenuation of effects at greater distances effectively diminishes the perceived magnitude of change, resulting in an incomplete evaluation of potential harm.

This approach is exemplified by the treatment of communities located beyond the 20-kilometre threshold. As noted in the evidence, these areas, despite hosting highly sensitive receptors, receive little to no place-specific assessment, with their effects broadly downplayed. Such systematic discounting undermines the integrity of the environmental impact assessment by failing to capture the true extent of change experienced by these communities. Consequently, the assessment does not provide a comprehensive understanding of environmental consequences, which is essential for informed decision-making.

1.1.645 Personal Observations

In addition to the planning matters above, I am personally concerned because: We have these wind turbines in mid-Michigan, USA. They're huge, loud, ugly monstrosities that spin incredibly fast and kill every bird in their path. The impact of these wind turbines on the coast of the Hebrides would be devastating to INTERNATIONALLY protected sea birds, local tourism and island economies and the people who live in these areas. If Spain wants them, put these wind turbines off the coast of Spain!!

1.1.646 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 670
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.

1.1.647 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 proposal 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 development be fully identified, assessed, and reported prior to any decision. This 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 statutory tests. The evidence before the authority does not demonstrate compliance with these requirements. The absence of a comprehensive and lawful assessment constitutes a fundamental deficiency and omission in the application.

Given these failures, the proposal conflicts with the applicable legal and policy framework. Such non-compliance weighs decisively against the granting of consent. In the absence of adequate EIA and HRA documentation, 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 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.

1.1.648 Conflict with National Planning Framework 4 and the Development Plan

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

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

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

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

The proposal conflicts with the terrestrial development plan framework, including the Argyll and Bute Local Development Plan 2, resulting in adverse effects on the

landscape, heritage, and community interests that these policies are designed to protect. This inconsistency undermines the objectives of the development plan, which seeks to safeguard these key local attributes. Furthermore, the proposal is not only at odds with the local development plan but also fails to align with the broader strategic aims set out in National Planning Framework 4. The applicant has not provided evidence to demonstrate that these conflicts can be mitigated or justified. Consequently, the proposal is fundamentally incompatible with the relevant terrestrial development plan policies.

1.1.649 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 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.

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.

1.1.650 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 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.

1.1.651 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.

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.

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.

1.1.652 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 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.

1.1.653 Cumulative and In-Combination Effects

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

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

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

The practical consequence of relying on flawed baseline assessments is that the cumulative impact assessment is rendered unreliable and systematically underestimates the true combined effects of development proposals. This is because the cumulative assessments are contingent on conclusions drawn elsewhere in the Environmental Impact Assessment. Specifically, where the initial evaluations of landscape, heritage, and socio-economic effects have understated impacts—as detailed previously—the cumulative assessment similarly adopts this diminished baseline. As a result, the aggregate effects of the proposal under consideration, when combined with other existing, consented, and foreseeable developments, are correspondingly understated. This fundamental dependency undermines confidence in the cumulative impact conclusions and suggests that the full extent of combined development effects has not been appropriately accounted for.

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.

1.1.654 Public Engagement, Site Selection and Environmental Information

The consultation process associated with the site-selection and application stages has exhibited significant deficiencies in public participation, which critically undermines the legitimacy of the decision-making framework. The applicant places considerable weight on the site-selection process, rendering the quality of public engagement directly material to the determination. However, the extensive technical documentation submitted spans many thousands of pages, and the consultation period has coincided with the peak months of the year for island communities. During this time, local residents are engaged continuously in the visitor season, while access to specialist advice is notably limited. This disparity is accentuated by the applicant’s prolonged preparation period, supported by substantial professional and financial resources, highlighting an imbalance that compromises effective participation.

Furthermore, the requirements set out in GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, mandate that those affected must have a realistic opportunity to engage meaningfully in decisions of such significance. The conditions under which the affected communities have been expected to respond fall short of these standards. It is therefore imperative that Ministers give careful consideration to these shortcomings in public participation when evaluating the representations submitted, recognising the impact these procedural inadequacies may have on the fairness and integrity of the site-selection process.

The Environmental Impact Assessment 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.

1.1.655 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 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 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 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.

While the applicant's assessment attributes a Low magnitude of change to the South Tiree coastal area despite its High sensitivity at approximately 35 kilometres, this conclusion merits closer scrutiny. Tiree's landscape is uniquely defined by its exceptionally low-lying topography, with the highest elevation at Ben Hynish reaching only 141 metres. This flat, open oceanic horizon is a defining characteristic,

making the introduction of turbines up to 335 metres in height unprecedented and markedly intrusive. The significant vertical scale of these structures contrasts sharply with the island's natural features, suggesting that the assessment substantially understates the true magnitude of change. Consequently, the evaluation of effects on Tiree's sensitive and distinctive landscape character appears unreliable, warranting a more rigorous and proportionate appraisal of visual and environmental impact.

While the applicant's assessment applies distance-based mitigation measures to certain seascape receptors, this approach fails to address significant effects experienced by mainland and island communities with direct views and economic dependence on the seascape. Notably, Gigha, a community-owned island emblematic of island regeneration, faces the development waters from the east; yet, the impact on its delicate community balance and local economy remains unexamined. Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas, precisely the receptors subject to the contested distance-based mitigation, have not been adequately assessed. Furthermore, the west coast of Kintyre comprises a series of communities whose identity and visitor economy are intrinsically linked to the open Atlantic seaboard views towards Islay, Jura, and surrounding waters. The Treshnish Isles and adjacent small islands and mainland coasts sharing outlooks towards the development area are likewise excluded from comprehensive evaluation. This omission compromises the thoroughness of the applicant's environmental appraisal and undermines the reliability of conclusions regarding the seascape's wider social and economic sensitivities.

There remains considerable uncertainty 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.

1.1.656 Personal Observations

In addition to the planning matters above, I am personally concerned because: The proposal will affect the tourism on which these islands depend for a living. As a visitor it will affect my enjoyment of the unspoiled outlook in this area.

Based on my own local knowledge, I also wish to highlight that: I cannot see why spoiling this area is in any way necessary.

Finally, I would also ask the Scottish Ministers to consider: Ministers should ask themselves why the invasion of this area will benefit the people of Scotland, We are repeatedly told that more wind energy than the country needs is already in place.

1.1.657 Summary

The proposal put forward by the applicant fails to satisfy the statutory and policy requirements governing its determination. Their own evaluation acknowledges significant impacts upon nationally designated landscapes, as well as the cultural heritage and communities along this coastline. Independent analyses of the applicant's documentation reveal that these impacts have been understated. Moreover, a comprehensive heritage assessment, as mandated, has not been completed. The identified effects on the island communities within the project's influence have neither been adequately assessed nor addressed. Additionally, the ecological criteria necessary to demonstrate compliance remain unproven. It is also pertinent that only a portion of the overall project is currently submitted for consideration by the Scottish Ministers.

Given these substantial deficiencies, it is respectfully submitted that the Scottish Ministers should refuse consent for the MachairWind Offshore Wind Farm proposal and reject the associated marine licence application.

Should the Scottish Ministers be inclined not to refuse consent outright, it is requested that they require the submission of further environmental information alongside enhanced visualisations. Furthermore, it is essential that the applications be determined only following a public inquiry, thereby allowing thorough examination of the concerns raised in this objection. Irrespective of the final decision, it is also requested that the Ministers explicitly address and articulate their conclusions regarding the effects on cultural heritage and on the island communities impacted by the proposal.

Yours faithfully,

[Redacted]

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

Member of the public 671
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.

1.1.658 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 and physiographical features of special interest, as well as on sites, buildings, and objects of architectural, historic, or archaeological interest, as required by Schedule 9 of the Electricity Act 1989. The evidence provided does not adequately address these statutory duties, leaving significant uncertainties and omissions regarding the protection and conservation of these important interests.

Given that the Scottish Ministers must have regard to these same statutory duties in determining the application, the absence of demonstrated compliance and the identified deficiencies weigh decisively against the granting of consent. The application’s failure to meet the legal requirements under Schedule 9 constitutes a fundamental procedural and substantive defect that cannot be overlooked in the decision-making process.

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 acknowledges that National Planning Framework 4 (NPF4) is a significant material consideration and must be applied alongside the relevant statutory duties and legislative requirements. The proposal engages several key policies within NPF4, specifically Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy). These policies set out clear expectations for the protection and enhancement of biodiversity, natural environments, historic assets, and the sustainable use of energy in development proposals.

However, the evidence demonstrates that the proposal fails to comply with these critical policies. There is no satisfactory demonstration of compliance with Policy 3 regarding biodiversity; the application lacks adequate assessment or mitigation measures to ensure the protection or enhancement of biodiversity interests. Similarly, under Policy 4, the proposal does not sufficiently address the conservation or enhancement of natural places, resulting in a failure to meet the policy's requirements for safeguarding natural environments.

Regarding Policy 7, the proposal does not provide the necessary evidence to confirm that historic assets and places will be preserved or appropriately managed. The absence of a thorough heritage impact assessment or mitigation strategy indicates a conflict with the statutory duties to protect historic assets. Finally, with respect to Policy 11 on energy, the application does not demonstrate compliance with the policy's requirements for sustainable energy use or energy efficiency, nor does it provide evidence of alignment with relevant legislative standards.

Where compliance has not been demonstrated, and where the evidence identifies deficiencies, omissions, or conflicts with the applicable legal and policy framework, these matters weigh against the granting of consent. Given the proposal's failure to meet the requirements of Policies 3, 4, 7, and 11 of NPF4, it is clear that the application does not accord with the national planning framework and associated statutory duties.

In conclusion, the proposal's non-compliance with key policies of National Planning Framework 4 concerning biodiversity, natural places, historic assets, and energy constitutes a significant planning objection. The deficiencies and omissions identified in the applicant's evidence justify refusal of consent in accordance with the applicable legal and policy framework.

The 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 demonstrate compliance with the statutory requirement under the Islands (Scotland) Act 2018 to consider and give due weight to the interests of island communities. This omission represents a significant procedural deficiency in the decision-making process, undermining the legal obligation to properly assess the impact on these communities.

Given that the evidence identifies this failure to comply with the applicable legal and policy framework, the proposal does not meet the necessary standards for consent. Such deficiencies weigh decisively against the granting of planning permission in this case.

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.

1.1.659 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.

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 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.

1.1.660 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.

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 are often proposed to reduce the visual impact of offshore developments, in this instance the introduction of aviation and navigation lighting would mark a permanent and significant alteration to the night-time seascape. The existing horizon currently lacks any such lighting, and the proposed illumination would be visible throughout the stated 35-year operational life of the development. This change is not merely temporary; the presence of artificial lighting on the sea horizon would fundamentally transform the character of the seascape during nighttime hours, diminishing its natural qualities.

Moreover, the temporal limitation of 35 years does not mitigate the policy implications of this harm. Granting consent for the development effectively designates this seascape as appropriate for wind farm use, thereby endorsing a permanent shift in its character. Such a decision carries weight beyond the operational lifespan, as it signals acceptance of the seascape's alteration and the associated lighting effects. In light of these considerations, the impact on night-time seascape character and lighting should be regarded as a significant factor weighing against approval.

The proposal has resulted in effects that engage multiple critical policies, specifically NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. A detailed examination reveals that the applicant has failed to demonstrate that its conclusions regarding the scale of these effects align with its own established methodology. Moreover, there is an absence of evidence showing compliance with the policies designed to protect nationally important landscapes and seascapes. In light of this, the proposal does not meet the necessary requirements set out in the relevant planning policies safeguarding these valued environmental interests and should therefore be refused.

1.1.661 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 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 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 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.

1.1.662 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's failure to assess habitability impacts on island communities undermines the reliability of their socio-economic conclusions and risks overlooking significant adverse effects. Their own consultants acknowledged habitability as a potentially significant pathway of impact, yet no specific assessment was undertaken for the affected islands. Instead, the socio-economic evaluation in Chapter 18 is conducted at a regional scale, focusing on port communities while neglecting a place-based analysis of the island communities directly facing the development. Despite this omission, the assessment concludes that these island communities have low sensitivity to tourism effects, a finding unsupported by targeted evidence.

Island economies are distinct from regional averages; they rely heavily on sectors directly tied to the qualities that attract visitors. This economic concentration heightens their vulnerability rather than mitigating it, as dependence on increasing visitor numbers intensifies sensitivity to changes in those visitor-attracting attributes. Therefore, concluding low sensitivity without a detailed, place-specific assessment is not a substantiated finding but rather an unproven assumption. This methodological flaw renders the socio-economic assessment inadequate for understanding or mitigating the proposal's impacts on island communities.

The proposal fails to comply with 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.

1.1.663 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 signifies an acknowledgment of potential adverse effects on the North Colonsay and Western Cliffs Special Protection Area, specifically concerning the guillemot population. Such documents are typically prepared when it is not possible to exclude an adverse effect on the integrity of a protected site, and their inclusion in the application underscores the applicant's recognition of this risk. Notably, the reliance on these derogation and compensation plans indicates that the applicant accepts the necessity of measures to address impacts that may arise, yet leaves open the possibility that Scottish Ministers might reach a different conclusion regarding the presence or severity of any adverse effects. This approach reflects a cautious and procedural step towards

mitigation but does not in itself resolve the question of whether significant effects on the protected site can be avoided.

The 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 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.

1.1.664 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 practical consequence of relying on flawed baseline assessments is that the cumulative impact assessment is rendered unreliable and systematically underestimates the true combined effects of development proposals. This is because the cumulative assessments are contingent on conclusions drawn elsewhere in the Environmental Impact Assessment. Specifically, where the initial evaluations of landscape, heritage, and socio-economic effects have understated impacts—as detailed previously—the cumulative assessment similarly adopts this diminished baseline. As a result, the aggregate effects of the proposal under consideration, when combined with other existing, consented, and foreseeable developments, are correspondingly understated. This fundamental dependency undermines confidence in the cumulative impact conclusions and suggests that the full extent of combined development effects has not been appropriately accounted for.

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.

1.1.665 Public Engagement, Site Selection and Environmental Information

The consultation process has been fundamentally compromised by deficiencies in public participation, directly impacting the legitimacy of the site-selection process. The application consists of many thousands of pages of technical material, yet the consultation period occurred during the busiest months for island communities, when residents are continuously engaged through the visitor season and access to specialist advice is severely limited. Meanwhile, the applicant benefited from years of preparation supported by substantial professional and financial resources. National Marine Plan policy GEN 18 and the principles of effective public participation

enshrined in the Aarhus Convention require that affected communities have a realistic opportunity to engage in decisions of this scale. The conditions imposed on these communities have fallen short of that essential standard, a matter that Scottish Ministers must weigh carefully when considering the representations made.

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.

1.1.666 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 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 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 recognises the presence of Ulva within the Loch na Keal National Scenic Area and acknowledges its status as a community-owned island undergoing regeneration. Ulva's recovery is dependent on the preservation of its natural setting and unspoilt seascape, yet the applicant has not undertaken any specific assessment of the effects on this small, re-establishing community. Similarly, Staffa, located approximately 35 kilometres from the development area and within the same National Scenic Area, is identified as one of Europe's most celebrated small islands. Despite this, the applicant concludes that the scale of change at Staffa would be small and the effects not significant, even though their own evaluation recognises its panoramic maritime qualities. This conclusion is drawn despite Staffa lying beyond the 30-kilometre distance within which NatureScot requested an effects assessment.

Further afield, the applicant assesses the Jura National Scenic Area, situated about 28 to 32 kilometres from the development site, as having High sensitivity but attributes a Medium to Low magnitude of impact. This moderation is justified by distance, apparent scale, and retained landforms, notwithstanding that the designation of Jura rests on its wild, undeveloped Atlantic outlook. The same approach is applied to the Scarba, Lunga, and the Garvellachs National Scenic Area, located approximately 35 to 40 kilometres away. Such treatment underestimates the significance of these designated landscapes and the vulnerabilities of the island communities they encompass, thereby undermining the protection of their natural and cultural qualities.

The applicant's assessment assigns 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 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 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.

1.1.667 Personal Observations

In addition to the planning matters above, I am personally concerned because: Changes the landscape of our country.

1.1.668 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the requirements set out by the relevant statutory and policy frameworks. The applicant’s own evaluation acknowledges considerable impacts on nationally designated landscapes, as well as on the cultural heritage and communities along this coastal area. 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. Although the detrimental effects on the island communities concerned were recognised, they have never been properly assessed. In addition, the ecological safeguards mandated by applicable tests have not been demonstrated as achievable. It is also noteworthy that only a portion of the project is currently under consideration by Scottish Ministers.

In light of these significant 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 decide against refusal, it is requested that they require the submission of further environmental information and enhanced visualisations. Moreover, the applications should only be determined following a public inquiry, enabling a comprehensive examination of the issues raised in this objection. Regardless of the outcome, I further ask that the Ministers explicitly address and record their conclusions regarding the effects on cultural heritage and the impacted island communities within their 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 672
Dear Sir/Madam,

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

I request that this letter be formally recorded as an objection, that my status as an objector be duly noted, and that I be informed of the determination made in respect of these applications.

The grounds of my objection are firmly grounded in planning and environmental considerations, which are assessed against the statutory and policy frameworks applicable to these proposals. It is important to emphasise that the onus lies with the applicant to provide compelling and sufficient evidence that all relevant statutory tests and policy requirements are met. Objectors, including myself, are not obliged to establish contrary proof. Upon examination of the evidence presented, it is clear that the applicant has failed to meet this evidential burden. Consequently, the applications do not satisfy the necessary criteria and therefore consent ought to be refused.

1.1.669 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.

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.

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.

1.1.670 Seascape, Landscape and Visual Effects

There is considerable uncertainty surrounding the reliability of the applicant's assessment methodology, particularly in relation to the treatment of distance thresholds and their influence on predicted effects. Notably, the applicant's written methodology in Appendix 16.1 does not specify any distance beyond which major effects are considered to cease. However, an independently prepared Evidence Note, based entirely on the applicant's Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern across all three assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of the receptor's sensitivity or the extent of visibility.

Furthermore, the applicant's own documentation demonstrates that distance plays a significant role in shaping these judgements. For example, the assessment of a coastal area situated over 30 kilometres away concludes that, given the viewing

distance, the scale of change is small. Similarly, the Landscape Character synthesis categorises magnitude of change as High within approximately 20 kilometres, Medium between approximately 20 and 30 kilometres, and Low beyond approximately 30 kilometres for certain landscape types. This gradation based on distance appears to systematically moderate the magnitude of effect as distance increases.

The consequence of this approach is that the protective tests are being applied to understated inputs. By moderating magnitude at the very distances where some of the most sensitive designated landscapes are situated, the conclusions reached fail to provide a reliable representation of the effects the Scottish Ministers are being asked to consent. This fundamental uncertainty in the assessment methodology undermines confidence in the accuracy and robustness of the predicted impacts on sensitive receptors.

The applicant's submission relies on visualisation materials prepared in accordance with NatureScot's visualisation guidance. This guidance explicitly acknowledges inherent limitations in such materials, noting that printed visualisations cannot fully replicate the scale perceived by a viewer in the field. Furthermore, wireline drawings included within the same panoramic projections share these constraints; they represent technical renderings that accompany the photographic evidence rather than serve as independent corrections or enhancements. Consequently, while these visualisations provide a useful reference, their ability to convey the true visual impact of the development is inherently restricted. This limitation should be carefully considered when assessing the overall visual effects, as reliance solely on these materials may understate the experiential scale and presence of the proposed scheme.

The introduction of aviation and navigation lighting to an otherwise unlit sea horizon will permanently alter the character of the night-time seascape for the full 35-year operational period of the development. This change is not merely a temporary inconvenience; it represents a fundamental and lasting transformation of the visual environment. Moreover, from a policy perspective, granting consent for this development effectively endorses the suitability of this seascape for wind farm use, thereby setting a precedent for future decisions. Such implications must be carefully weighed in considering the acceptability of the proposal.

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.

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

The applicant 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.

1.1.672 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 socio-economic assessment notably contrasts the detailed evaluation of potential port communities with a generalized, regional-level approach to island communities, despite acknowledging habitability as a significant pathway for impact. While mitigation measures are proposed with respect to port areas, no comparable place-based assessment or tailored mitigation is undertaken for the island communities directly affected by the development. This discrepancy undermines confidence in the adequacy of the proposed mitigation for these island populations.

Island economies, by their nature, differ markedly from regional averages. Their economic structures are heavily concentrated in sectors reliant on the unique qualities that attract visitors, making them particularly sensitive to any changes in those attributes. Contrary to this reality, the applicant's conclusion that island communities exhibit low sensitivity to tourism-related effects is reached without the

benefit of localized, place-specific analysis. Such a conclusion cannot be considered robust evidence but rather an unsubstantiated assumption.

Given these considerations, the methodology employed fails to capture the nuanced vulnerabilities of island communities, and the absence of place-based assessment leaves the true socio-economic impacts inadequately understood and potentially unaddressed. It is therefore essential that a more detailed and context-specific evaluation be undertaken to ensure that mitigation measures are appropriately targeted and effective for island populations.

The proposal fails to meet essential planning and statutory requirements for 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.

1.1.673 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 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 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 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.

1.1.674 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 proposed mitigation measures outlined in the Environmental Impact Assessment must be carefully weighed against the baseline from which cumulative effects are assessed. However, the cumulative impact assessment relies heavily on the conclusions of the landscape, heritage, and socio-economic evaluations conducted earlier in the report. Given that these foundational assessments appear to understate certain effects, the effectiveness of mitigation cannot be fully appreciated without addressing this initial shortfall.

It is important to recognise that the cumulative assessment effectively compounds any underestimation present in the underlying baseline. If the baseline itself minimises impacts, then the aggregation of this proposal with other existing, consented, and foreseeable developments will similarly reflect an artificially reduced scale of combined effects. This means the true cumulative impact on landscape character, heritage assets, and local socio-economic conditions may be significantly greater than reported.

Therefore, the cumulative effects assessment as presented is unreliable and does not provide a robust foundation for decision-making. Until the initial landscape, heritage, and socio-economic assessments are revisited to ensure accurate representation of impacts, the cumulative assessment cannot be considered a sound basis for concluding that the combined effects of development will be acceptable. Further scrutiny and refinement are necessary to establish a realistic understanding of cumulative impacts.

The applicant’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.

1.1.675 Public Engagement, Site Selection and Environmental Information

There is significant uncertainty surrounding the adequacy of the public participation process in relation to the site-selection exercise. Given that the applicant requests Scottish Ministers to place considerable weight on this process, the quality of public engagement is a matter of direct relevance. However, deficiencies identified at both the plan and site-selection stages have persisted through to the application phase. Notably, the application itself comprises an extensive volume of technical documentation, amounting to many thousands of pages.

Compounding this complexity, the consultation period has coincided with the busiest months for island communities, during which residents are engaged continuously throughout the visitor season. This timing has limited the availability of specialist advice and placed considerable strain on those affected, while the applicant has had the advantage of years of preparation supported by substantial professional and

financial resources. Such an imbalance raises questions about the fairness and accessibility of the consultation process.

The requirements set out in GEN 18 of the National Marine Plan, alongside the principles of effective public participation enshrined in the Aarhus Convention, mandate that affected parties must have a genuine and realistic opportunity to engage in decisions of this scale. Unfortunately, the conditions under which local communities have been expected to respond fall short of these standards. It is therefore essential that Ministers give careful consideration to these shortcomings when evaluating the representations submitted.

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.

1.1.676 Effects on Local Area

There remains considerable uncertainty regarding the adequacy of the applicant's assessment of the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Although Islay and Colonsay lie in closest proximity to the proposed development—which extends over a 448 square kilometre area immediately north-west of Islay and west of Colonsay—the application primarily addresses Islay in terms of its potential as a direct project location. This approach neglects a thorough, place-based evaluation of the impacts on Islay as a distinct island community, particularly its Atlantic-facing settlements that confront the nearest edge of the development zone, leaving potential effects on their setting, local economy, and community life insufficiently explored.

The situation is no less concerning for Colonsay and Oronsay, where the seaward outlook is integral to daily life and faces directly towards the development array. Notably, the North Colonsay and Western Cliffs Special Protection Area lies along Colonsay's coastline and forms the focus of the applicant's derogation case and compensation proposals. This area hosts an internationally protected seabird population, and the application itself acknowledges that harm to this resource cannot be excluded, highlighting a degree of unresolved risk and impact. Such an admission underscores the need for a more comprehensive and transparent assessment of the environmental consequences.

Furthermore, Oronsay Priory, a scheduled monument of national importance situated within this community's area, also demands closer scrutiny. The identified gaps in the heritage assessment apply equally to the evaluation of its open maritime setting, which forms a critical part of its historic significance. Taken together, these considerations demonstrate that the current environmental and heritage impact evaluation does not convincingly address all relevant effects on these islands, thereby undermining the reliability of the overall assessment and warranting further detailed and place-specific analysis.

The applicant's assessment 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 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.

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.

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 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.

1.1.677 Personal Observations

Finally, I would also ask the Scottish Ministers to consider: That these windfarms are not wanted. The size of them and it will destroy beautiful landscapes, habitat and wildlife, the visual impact.

1.1.678 Further Comments

Please protect Scotlands beauty and wildlife. These windfarms are not needed.

1.1.679 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 673
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.

1.1.680 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 explicitly requires the applicant to have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, as well as protecting sites, buildings, and objects of architectural, historic, or archaeological interest. The evidence submitted does not adequately address these requirements, nor does it show that reasonable steps have been taken to mitigate adverse effects on these protected interests. This omission represents a significant shortfall in meeting the statutory obligations imposed on both the applicant and the Scottish Ministers in the determination of this proposal.

Given these deficiencies and the failure to demonstrate compliance with the statutory framework, the application conflicts with the legal and policy requirements established by Schedule 9 of the Electricity Act 1989. Where such conflicts and omissions exist, they must weigh decisively against the granting of consent. The absence of sufficient evidence to satisfy these duties undermines the legitimacy of the application and compels a refusal on the basis of non-compliance with the statutory duties designed to safeguard important environmental and heritage interests.

The marine licence application 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.

The applicant's submission acknowledges that National Planning Framework 4 (NPF4) is a significant material consideration and that its policies must be applied alongside relevant statutory duties and legislative requirements. Specifically, the proposal engages Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy) of NPF4. However, the evidence before the determining authority demonstrates that the proposal fails to comply with these key policies.

Firstly, with regard to Policy 3 (Biodiversity) and Policy 4 (Natural Places), the applicant has not demonstrated compliance. The evidence identifies deficiencies and omissions in the assessment and protection of biodiversity and natural places. These shortcomings mean that the proposal does not meet the statutory and policy requirements to safeguard and enhance biodiversity and natural environments as mandated by NPF4.

Secondly, concerning Policy 7 (Historic Assets and Places), the proposal similarly fails to demonstrate that it will preserve or enhance historic assets and places. The evidence reveals conflicts with the applicable legal and policy framework protecting heritage, with no adequate mitigation or justification provided to address the adverse impacts identified.

Thirdly, in relation to Policy 11 (Energy), the applicant has not shown that the proposal aligns with the energy policies set out in NPF4. The evidence highlights omissions and uncertainties in the energy assessment, indicating non-compliance with the policy's requirements.

Where compliance with these policies has not been demonstrated, and where the evidence identifies deficiencies, omissions, or conflicts with the applicable legal and policy framework, these matters weigh decisively against the granting of consent.

The proposal's failure to satisfy the requirements of Policies 3, 4, 7, and 11 of NPF4 constitutes a fundamental breach of the statutory and policy framework that must be afforded significant weight in the determination of this application. Consent should therefore be refused.

The application fails to provide an adequate Environmental Impact Assessment (EIA) as mandated by The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations. These regulations require that the likely significant environmental effects of the proposal be identified, assessed, and reported prior to any determination. The submitted documentation does not meet this statutory requirement, lacking a comprehensive and robust assessment of environmental impacts. This deficiency undermines the decision-making process by failing to present the necessary evidence to evaluate the proposal's environmental consequences fully.

Furthermore, the proposal does not comply with the Habitats Regulations, which require a thorough assessment of the effects on European protected sites in accordance with the applicable statutory tests. The absence of such an assessment, or any demonstration of compliance, constitutes a clear breach of legal obligations. Where compliance has not been demonstrated, or where evidence reveals deficiencies, omissions, or conflicts with the applicable legal and policy framework, these matters must weigh decisively against the granting of consent. Given the failure to satisfy these fundamental statutory requirements, the proposal should be refused.

The proposal fails to 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 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.

1.1.681 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 NPF4 Policy 11, which governs support for renewable energy development. Although Policy 11 endorses such development, this support is conditional and operates strictly within the framework of its specified impact tests, notably those set out in Policy 11(c) concerning effects on communities, and Policies 11(d) and 11(e) relating to impacts on landscape, seascape, and other receptors. A detailed examination reveals that the proposal fails to satisfy these criteria. It would inflict significant adverse effects upon nationally designated landscapes and seascapes, a matter that weighs heavily against compliance. Furthermore, there is an absence of convincing evidence demonstrating that the cultural significance of scheduled monuments and their settings would be adequately preserved. Equally, the proposal does not convincingly ensure the safeguarding of island communities as required. Lastly, the ecological assessments provided lack the necessary clarity and robustness to confirm that the relevant ecological tests can be met. Taken together, these unresolved issues indicate a clear conflict with the policies encapsulated in NPF4 Policy 11, undermining the proposal’s claim to policy support for renewable energy development.

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

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

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

designated assets, necessitating its refusal in order to uphold national planning objectives.

1.1.682 Seascape, Landscape and Visual Effects

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

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.

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.

1.1.683 Cultural Landscape, Archaeology and Historic Environment

There is considerable uncertainty regarding the robustness of the applicant's assessment methodology as applied to the evaluation of heritage impacts in this case. While the applicant states that they have adopted Historic Environment Scotland's recognised approach for assessing effects on the setting of historic assets—a methodology developed and refined through consultation with Historic Environment Scotland—closer examination reveals shortcomings in its application. This established methodology requires a thorough evaluation not merely of visual changes, but specifically whether such changes affect the contribution that the setting makes to the cultural significance of the heritage asset, including an assessment of whether the integrity of that setting is adequately retained. Importantly, the methodology explicitly advises against equating visual change directly with adverse impact.

However, a published Methodological Audit, prepared independently in support of community objections and relying solely on the applicant's own Appendix 14.3, identifies a critical gap. While the assessment comprehensively describes visual changes—addressing aspects such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—it fails to demonstrate how the integrity of the setting has been evaluated in accordance with the applicant's accepted methodology. The key evaluative step, which would link these visual changes to any effect on the setting's integrity, is absent in all the worked examples examined by the Audit. Consequently, the conclusions drawn about the integrity of the setting being adequately retained rest on an incomplete and insufficiently substantiated analysis.

In summary, the applicant's assessment does not fully comply with the required methodology, casting doubt on the reliability of its conclusions regarding heritage impacts. This deficiency undermines confidence that the cultural significance and integrity of historic assets have been properly safeguarded.

The 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 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.

1.1.684 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 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.

1.1.685 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.

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 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.

1.1.686 Cumulative and In-Combination Effects

The cumulative impact assessment significantly underestimates the true combined effects of the proposed development when considered alongside existing, consented, and foreseeable projects. This underestimation arises directly from the reliance on baseline assessments within the Environmental Impact Assessment that have already understated effects related to landscape, heritage, and socio-economic factors. Consequently, the starting point for cumulative evaluation is a diminished baseline, leading to a cumulative assessment that fails to capture the full extent of potential impacts.

This flawed approach undermines the reliability of the cumulative impact conclusions, as it compounds initial errors in individual assessments rather than providing a comprehensive account of the aggregate effects. Where baseline conditions are inaccurately represented as less sensitive or less affected, the cumulative assessment inherently minimizes the scale and significance of combined impacts, resulting in an inadequate basis for informed decision-making.

The applicant has failed to demonstrate that the cumulative and in-combination effects of the proposal have been thoroughly identified and assessed, contrary to 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. This omission raises significant concerns about the adequacy of the environmental impact appraisal for the project as a whole.

Furthermore, the environmental assessment does not explicitly address the deferred works, which are integral to understanding the full scope and impact of the development. Without clear consideration of these elements, the decision-making process cannot fully account for potential adverse effects, undermining compliance with established policy and regulatory frameworks.

In light of these issues, it is essential that the treatment of deferred works be expressly addressed in the determination to ensure full compliance with planning policies and environmental legislation. Failure to do so would represent a material shortcoming in the assessment and could lead to uninformed decision-making.

1.1.687 Public Engagement, Site Selection and Environmental Information

The consultation process associated with the site-selection for this proposal exhibits significant deficiencies that compromise the legitimacy of the decision-making framework. The applicant seeks substantial weight to be afforded to the site-selection process by the Scottish Ministers, rendering the quality of public participation therein directly material. However, these deficiencies evident at the plan and site-selection stages have persisted into the application phase. The application itself comprises many thousands of pages of technical documentation, with the consultation period coinciding with the busiest months for island communities. During this visitor season, residents engage in continuous work and access to specialist advice is notably limited, whereas the applicant has had years, alongside considerable professional and financial resources, to prepare its case.

Such circumstances fall short of the standards mandated by GEN 18 of the National Marine Plan and the principles of effective public participation enshrined within the Aarhus Convention. Those affected by this decision have not been afforded a realistic opportunity to engage meaningfully with a matter of such magnitude. It is therefore incumbent upon the Ministers to bear these shortcomings firmly in mind when weighing the representations submitted, recognising that the process has not met the requisite standards of effective public participation.

The Environmental Impact Assessment (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.

1.1.688 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 significantly underestimates the visual, community, and heritage impacts of the proposed development on Iona, thereby compromising the accuracy 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 turbines would be visible across approximately 21 kilometres and span roughly 39 degrees of the horizon, including effects on the ferry crossing between Fionnphort and Iona. Similarly, the West Coast of Iona is considered highly sensitive with widespread visibility, and the applicant acknowledges significant effects on

residents and visitors across 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, is of international heritage importance. The applicant's own baseline recognises the significance of pilgrimage, arrival by sea, and movement through the landscape to this heritage value. Despite Historic Environment Scotland's request for additional viewpoints, including from the ferry crossing itself, no visualisation has been provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, a notable omission that hinders a proper understanding of the visual impact on this heritage setting.

Community concern is also profound; a household consultation on Iona revealed that 92 per cent of respondents object to the proposal. Notably, habitability—a pathway of potential effect identified by the applicant's consultants—has never been assessed, leaving a critical gap in understanding the social consequences for the island's residents. To contextualise the scale of the visual intrusion, the tallest turbines would exceed the height of Ben Hynish on Tiree, a familiar landmark visible from Iona at approximately 33 kilometres. The turbines would overtop Ben Hynish by about 194 metres at a closer distance of roughly two-thirds of that, demonstrating the substantial and intrusive nature of the development's presence.

In conclusion, the applicant's evaluation fails to fully account for the significant and widespread visual, community, and heritage impacts on Iona, resulting in an incomplete and potentially misleading assessment of the development's effects. This shortcoming must be addressed to ensure a comprehensive and accurate appraisal.

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 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 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.

1.1.689 Personal Observations

In addition to the planning matters above, I am personally concerned because: It will be detrimental to the welfare of local communities, and will affect tourism, which the islands depend on

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

1.1.690 Further Comments

No

1.1.691 Summary

The proposal before the Scottish Ministers fails to satisfy the statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal area. However, published analyses of the applicant's documentation reveal that the extent of these impacts has been underestimated. Crucially, the necessary heritage assessment has not been conducted, and although effects on the island communities involved were identified, no comprehensive assessment of these impacts has been undertaken. Furthermore, the ecological criteria pertinent to the proposal have not been demonstrated as achievable. It is also important to note that only a portion of the project is currently submitted for Ministerial consideration.

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

Should the Ministers consider proceeding without refusal, I request that they require the submission of further environmental information alongside enhanced visualisations. Moreover, I propose that the applications be determined only following a public inquiry, thereby allowing the issues raised in this objection to be thoroughly examined. Regardless of the decision reached, I further request that the Ministers provide clear conclusions within their reasons specifically addressing the effects on cultural heritage and the impacted island communities.

Yours faithfully,

[Redacted]

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

Member of the public 674
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 under Part 4 of the Marine (Scotland) Act 2010, both submitted by MachairWind Limited (ScottishPower Renewables). I request that my objection be officially recorded, that I be recognised as an objector, and that I receive notification of the decisions reached on these applications.

The proposals concern the construction of an offshore wind farm with a generating capacity of approximately 2 gigawatts. The development would involve installing between 91 and 144 turbines, each reaching up to 335 metres to blade tip. This extensive infrastructure would occupy a Windfarm Development Area encompassing around 448 square kilometres of marine environment located north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in close proximity to the islands and coastal settlements of the southern Hebrides.

My objection is grounded in both planning and environmental considerations, which I will elaborate upon in the subsequent sections in direct relation to the statutory and policy framework applicable to these proposals. It is important to emphasise that the onus lies firmly with the applicant to provide sufficient, robust evidence demonstrating that all relevant statutory tests and policy requirements are met. Objectors bear no obligation to disprove the application. Having examined the information provided, I conclude that the applicant has failed to meet this evidential burden. Consequently, I contend that consent should be withheld.

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. Schedule 9 mandates that the applicant must have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, and protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant is required to take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The Scottish Ministers, in determining the application, are also required to have regard to these statutory duties. The evidence before the authority identifies deficiencies and omissions in the applicant’s consideration of these duties, resulting in a failure to demonstrate compliance. Such shortcomings weigh decisively against the granting of consent.

The marine licence application fails to demonstrate compliance with the statutory requirements of the Marine (Scotland) Act 2010 and the relevant policies of Scotland’s National Marine Plan, thereby warranting refusal. Under Part 4 of the Marine (Scotland) Act 2010, authorisation decisions must be taken in accordance with the National Marine Plan unless relevant considerations indicate otherwise. This application 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 applicant's submission recognises that National Planning Framework 4 (NPF4) is a significant material consideration and acknowledges the necessity to apply it 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), as identified in the applicant's evidence (S01).

However, the application fails to demonstrate compliance with these critical policies. The evidence provided does not adequately address the requirements set out in Policy 3 regarding the protection and enhancement of biodiversity. There is a lack of sufficient information to confirm that the proposal will avoid adverse impacts on biodiversity or contribute positively to its conservation. Similarly, under Policy 4, which seeks to safeguard natural places, the proposal does not provide convincing evidence that natural habitats and landscapes will be preserved or enhanced in accordance with the policy's objectives.

Regarding Policy 7, which concerns historic assets and places, the application does not satisfactorily demonstrate that the significance of any affected historic environment assets has been properly assessed or that any harm has been avoided or mitigated. The absence of comprehensive heritage impact assessments or appropriate mitigation strategies indicates a failure to comply with the statutory duties to protect historic assets.

Finally, with respect to Policy 11 on energy, the proposal does not clearly show that it aligns with the policy's requirements for sustainable energy use and generation. There is insufficient evidence to confirm that the development will contribute to energy efficiency or renewable energy targets as mandated by NPF4.

Given these deficiencies, omissions, and the failure to demonstrate compliance with the applicable legal and policy framework, the proposal conflicts with the requirements of NPF4. As stated in the applicant's own evidence (S01), where

compliance has not been demonstrated or where such conflicts exist, these matters weigh against the granting of consent.

In conclusion, the proposal does not meet the essential policy tests of National Planning Framework 4 in relation to biodiversity, natural places, historic assets, and energy. This failure to comply with key statutory policies and legislative requirements provides a clear basis for objection to the granting of planning permission.

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

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

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

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

Furthermore, the absence of demonstrated compliance, coupled with identified deficiencies and omissions in addressing the statutory framework, constitutes a direct conflict with the applicable legal and policy requirements. In accordance with established principles, such failures weigh decisively against the granting of consent for the proposal.

1.1.693 Conflict with National Planning Framework 4 and the Development Plan

There remains considerable uncertainty as to whether the proposal fully satisfies the impact criteria set out in NPF4 Policy 11, which governs support for renewable energy development. While the policy endorses such development, this endorsement is explicitly conditional upon compliance with its detailed impact provisions, including those relating to communities and landscapes.

In particular, Policy 11(c) requires that impacts on communities be carefully considered, while Policies 11(d) and 11(e) address the effects on landscape, seascape and other receptors. The evidence indicates that the proposal would result in significant adverse effects on nationally designated landscapes and seascapes. Moreover, it has not been demonstrated that the cultural significance of scheduled monuments and their settings would be adequately protected, nor that island communities would be safeguarded from detrimental impacts.

Furthermore, the ecological assessments submitted have not shown that the necessary tests can be met. Taken together, these concerns suggest that the proposal conflicts with the impact criteria embedded within Policy 11 and therefore does not fully benefit from the policy's support for renewable energy. This raises fundamental questions about the appropriateness of the development in this location.

The proposal fails to comply with multiple policies within the National Planning Framework 4 (NPF4) that 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 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.

1.1.694 Seascape, Landscape and Visual Effects

There is considerable uncertainty surrounding the reliability of the applicant's assessment methodology, particularly in relation to the treatment of distance thresholds and their influence on predicted effects. Notably, the applicant's written methodology in Appendix 16.1 does not specify any distance beyond which major effects are considered to cease. However, an independently prepared Evidence Note, based entirely on the applicant's Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern across all three assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of the receptor's sensitivity or the extent of visibility.

Furthermore, the applicant's own documentation demonstrates that distance plays a significant role in shaping these judgements. For example, the assessment of a coastal area situated over 30 kilometres away concludes that, given the viewing distance, the scale of change is small. Similarly, the Landscape Character synthesis categorises magnitude of change as High within approximately 20 kilometres, Medium between approximately 20 and 30 kilometres, and Low beyond approximately 30 kilometres for certain landscape types. This gradation based on distance appears to systematically moderate the magnitude of effect as distance increases.

The consequence of this approach is that the protective tests are being applied to understated inputs. By moderating magnitude at the very distances where some of the most sensitive designated landscapes are situated, the conclusions reached fail to provide a reliable representation of the effects the Scottish Ministers are being asked to consent. This fundamental uncertainty in the assessment methodology undermines confidence in the accuracy and robustness of the predicted impacts on sensitive receptors.

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 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 35-year operational lifespan of the project. This change would be distinctly perceptible, as the existing natural darkness over the sea is a defining characteristic of the area's seascape, contributing to its overall visual and experiential qualities. The introduction of artificial lighting in this context represents a significant and lasting modification to the night-time environment.

It is important to note that the 35-year operational period does not represent a limit to the potential harm in planning policy terms. The applicant's own assessment

confirms that granting consent for this development effectively constitutes a decision that this particular seascape is appropriate for wind farm use. This underscores the permanent nature of the policy implications, as the consent would establish a precedent recognising the acceptability of such industrial activity and its associated visual impacts within this seascape.

Given the permanent alteration to the night-time seascape and the broader policy significance of consenting this development, careful consideration must be given to the balance between renewable energy objectives and the preservation of seascape character. The lighting effects constitute a fundamental change that must be weighed alongside other environmental and landscape factors, ensuring that any decision fully addresses the enduring consequences for this sensitive coastal area.

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.

1.1.695 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 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 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 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.

1.1.696 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 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.

1.1.697 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 submission of a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan demonstrates the applicant's acknowledgement of potential adverse effects on the North Colonsay and Western Cliffs Special Protection Area, specifically concerning the guillemot population. Such documents are typically prepared in circumstances where it cannot be conclusively ruled out that the proposal would harm the integrity of a protected site. Their inclusion in the application therefore signals an acceptance that the development could have significant environmental impacts requiring careful regulatory consideration.

This approach also implies that the applicant anticipates the possibility that Scottish Ministers might arrive at a different assessment regarding the presence or extent of adverse effects. By submitting these documents, the applicant seeks to address and mitigate potential harm under derogation provisions, thereby facilitating a pathway for the proposal's approval despite unresolved ecological concerns. This evidences a pragmatic recognition of the risks involved, while leaving open the final determination of the site's conservation status to the competent authority.

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 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.

1.1.698 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 mitigation measures proposed rely heavily on the cumulative impact assessment, which in turn is founded upon baseline evaluations contained within the Environmental Impact Assessment. However, these baseline assessments for landscape, heritage, and socio-economic factors have been demonstrated to understate the extent of potential effects. Consequently, the cumulative impact assessment inherits this flawed foundation, resulting in a diminished portrayal of the combined effects arising from the proposed development alongside existing, consented, and foreseeable projects.

This reliance on an understated baseline undermines the reliability of the cumulative assessment, as the starting point fails to accurately capture the true magnitude of

existing and potential impacts. Without a robust and comprehensive baseline, the cumulative effects are correspondingly underestimated, calling into question the adequacy of the proposed mitigation and the overall conclusions regarding the development's acceptability.

The applicant's submission fails to adequately demonstrate compliance with key planning policies and environmental regulations concerning project splitting and the assessment of cumulative effects. Specifically, the requirements set out in GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the Environmental Impact Assessment Regulations necessitate a comprehensive and integrated evaluation of the proposal's overall impacts, including those arising from deferred works. Without such an assessment, the potential for significant adverse effects may be underestimated or overlooked, undermining the robustness of the environmental appraisal.

In light of this, it is essential that the decision-making process explicitly addresses how deferred works will be treated and assessed in combination with the current proposal. Only through a transparent and thorough consideration of all project elements can compliance with policy and regulatory standards be assured. Therefore, I request that the treatment of deferred works be expressly incorporated into the determination to ensure that cumulative and in-combination effects are reliably identified and assessed in accordance with the relevant statutory requirements.

1.1.699 Public Engagement, Site Selection and Environmental Information

There is significant uncertainty regarding whether the consultation process associated with this application has met the required standards of effective public participation, thereby raising concerns about the legitimacy of the site-selection process. The applicant urges Scottish Ministers to place considerable weight on the site-selection process; however, this depends fundamentally on the quality of public engagement throughout. Evidence indicates that deficiencies in participation at both the plan and site-selection stages have persisted into the application stage. The application itself comprises many thousands of pages of technical material, yet the consultation period coincided with the busiest months of the year for island communities, when residents are fully occupied by the visitor season and specialist advice is least accessible. Meanwhile, the applicant has had years, alongside substantial professional and financial resources, to prepare its case. Moreover, GEN 18 of the National Marine Plan, together with the principles of effective public participation enshrined in the Aarhus Convention, require that affected communities must have a realistic opportunity to engage in decisions of this scale. The conditions under which these communities have been expected to respond fall short of this standard. Ministers are therefore respectfully urged to bear this firmly in mind when considering the representations made.

The Environmental Impact Assessment submitted fails to provide sufficient information to enable the Scottish Ministers to reach a fully informed decision. Although it is comprehensive in scope, the assessment falls short in addressing key potential significant effects with adequate rigour. For instance, the landscape assessment relies on a distance-based pattern that is not supported by its own

methodology, while the heritage assessment lacks clear evidence of applying its stated integrity test. Additionally, the socio-economic assessment omits a focused place-based analysis of the affected islands, undermining its relevance. Crucially, the application defers consideration of certain impacts to future post-consent plans, monitoring, and additional approvals, yet the EIA Regulations require that likely significant effects be clearly understood prior to determination. It is therefore imperative that decisions are made on the basis of the evidence presently before the Scottish Ministers, not on assumptions that outstanding issues will be satisfactorily resolved later. The applicant has not demonstrated that the environmental information provided meets this essential standard.

1.1.700 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 own Coastal Character assessment acknowledges that the Sound of Iona is of high sensitivity, with a direct orientation towards the proposed development area and extensive visibility. The assessment identifies a large geographical extent of change, approximately 21 kilometres, with turbines spanning around 39 degrees of the horizon, resulting in an overall effect deemed Moderate and Significant. The West Coast of Iona is similarly rated as highly sensitive with widespread visibility, and the applicant concedes significant effects for both residents and visitors across much of the island, including at Dùn Ì, the island's highest point. Furthermore, the applicant's baseline recognises Iona's monastic landscape—comprising the Abbey, the Nunnery, and the high crosses—as heritage of international importance, with significance intrinsically linked to pilgrimage, arrival by sea, and movement through the landscape. Despite Historic Environment Scotland's request for additional

viewpoints, including from the ferry crossing itself, the applicant has failed to provide a visualisation from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, a notable omission given its heritage context.

Community concerns further underscore the scale of the impact. A household consultation on Iona revealed that 92 per cent of respondents object to the proposal, yet the applicant's own consultants identified habitability as a potential pathway of effect on this community, which has not been assessed. The perceived scale of the turbines can be contextualised by comparison with the landmark Ben Hynish on Tiree, which stands 141 metres high and is visible from Iona at approximately 33 kilometres. The largest turbines would surpass Ben Hynish by roughly 194 metres, despite being situated at about two-thirds of that distance. This comparison emphasizes the substantial visual intrusion and underlines that the applicant's assessment understates the significance of visual, community, and heritage impacts on Iona, thereby compromising the accuracy of the environmental and social impact evaluation.

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

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

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

The applicant's assessment 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.

In considering the potential visual and landscape effects of the proposed development on Tiree, it is instructive to compare the applicant's assessment with established understandings of the island's character and sensitivity. The applicant has attributed a Low magnitude of change to the South Tiree coastal area, despite recognising its High sensitivity at approximately 35 kilometres distance. This classification appears inconsistent when weighed against the unique and distinctive qualities of Tiree's landscape, which suggest a more significant impact is likely.

Tiree is an exceptionally low-lying island, characterised by its expansive sea and sky views that dominate the landscape. The highest elevation point, Ben Hynish, stands only 141 metres above sea level, reinforcing the openness and horizontality that define the island's visual identity. Introducing turbines reaching heights of up to 335 metres would impose vertical elements entirely without precedent in the seascape,

disrupting the island's intrinsic character. Such structures would be highly conspicuous and fundamentally alter the perceived scale and openness that are core to Tiree's sense of place.

Consequently, the conclusion that the magnitude of change would be Low underestimates the extent of visual and landscape effects that would arise from the development. This understatement leads to an unreliable evaluation that fails to fully account for the sensitivity of Tiree as a receptor. A more robust assessment would acknowledge the significant alteration to the island's open seascape and the introduction of prominent vertical features, thereby reflecting a greater magnitude of change commensurate with the island's distinctive landscape character.

The applicant's assessment fails to consider 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 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.

1.1.701 Personal Observations

In addition to the planning matters above, I am personally concerned because: It affects Scotland as a whole. Stop

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

Finally, I would also ask the Scottish Ministers to consider: Just Say No

1.1.702 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 675
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.

1.1.703 Legislative and Policy Framework

The proposal fails to comply with the statutory requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, which mandate that the likely significant environmental effects of the development must be identified, thoroughly assessed, and transparently reported prior to any determination. The submitted documentation does not demonstrate that these essential assessments have been adequately carried out, resulting in a fundamental procedural deficiency. This omission undermines the decision-making process by leaving the determining authority without the necessary evidence to evaluate the environmental consequences of the proposal in accordance with the law.

Furthermore, the proposal does not satisfy the obligations imposed by the Habitats Regulations, which require a rigorous assessment of the effects on European protected sites in line with the applicable statutory tests. The absence of a comprehensive Habitats Regulations Assessment means that the potential impacts on designated sites have not been properly considered or mitigated. This failure constitutes a direct conflict with the legal framework governing the protection of European sites. Given these significant shortcomings and the lack of demonstrated

compliance with both environmental impact assessment and habitats regulations, these matters must weigh decisively against the granting of consent for the proposal.

The applicant's submission acknowledges the statutory requirement under the Islands (Scotland) Act 2018 that the interests of island communities must be considered and given due weight in the decision-making process. This legislative framework, as set out in the Act, imposes a clear duty on decision-makers to ensure that the unique circumstances and needs of island communities are properly integrated into planning assessments.

However, the evidence before the determining authority fails to demonstrate compliance with this statutory duty. There is a conspicuous absence of any detailed assessment or substantive consideration of how the proposal would impact island communities specifically. The applicant's documentation does not provide the necessary analysis or evidence to show that the interests of these communities have been identified, evaluated, or appropriately weighed against the benefits or impacts of the development. This omission represents a fundamental deficiency in the planning submission.

Furthermore, the lack of demonstrable compliance with the Islands (Scotland) Act 2018 constitutes a direct conflict with the applicable legal and policy framework. The Act's requirements are not discretionary; they are mandatory considerations that must inform the decision-making process. Where such compliance is not evidenced, the statutory guidance is explicit that these deficiencies must weigh against the granting of consent. The absence of any meaningful engagement with or assessment of island community interests undermines the integrity of the planning process and fails to meet the legal threshold established by the Act.

In conclusion, the proposal does not satisfy 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 significant procedural and substantive shortcoming. This deficiency weighs decisively against the approval 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 shortfall in meeting the evidential burden necessary for lawful determination. Without such demonstration, the application remains unsupported by the essential proof required under the established legal and policy frameworks.

Moreover, the submitted evidence reveals clear deficiencies and omissions that directly conflict with applicable legal and policy standards. These unresolved conflicts and gaps in compliance are material considerations that must weigh heavily against the granting of consent. The absence of satisfactory evidence undermines confidence in the proposal's conformity with statutory and policy obligations.

In conclusion, the applicant's inability to discharge the responsibility to demonstrate full compliance with all relevant legal and policy requirements constitutes a decisive reason to refuse consent. The evidential shortcomings identified are not minor or

technical but go to the heart of lawful planning decision-making, mandating that the application be rejected.

1.1.704 Conflict with National Planning Framework 4 and the Development Plan

The proposal would result in significant adverse effects on multiple nationally designated assets, including landscapes, seascapes, heritage sites, and biodiversity, thereby failing to comply with several key policies within NPF4. Policy 11, which operates in conjunction with Policy 4(c) and 4(d) protecting National Scenic Areas and nationally important landscapes, explicitly seeks to prevent such detrimental impacts on the qualities for which these areas are designated. Additionally, Policy 7 and its subsections, including 7(h) concerning scheduled monuments and 7(c) and 7(d) relating to the settings of historic assets, mandate the protection of cultural significance, which the current proposal has not demonstrated.

Furthermore, the proposal does not provide adequate evidence to satisfy the ecological requirements set out in Policy 3 on biodiversity or to ensure the safeguarding of island communities as required. Given these shortcomings, the proposal is in clear conflict with multiple interrelated policies designed to protect nationally important landscapes, heritage assets, and biodiversity, and therefore cannot be supported in its present form.

The applicant's evidence clearly indicates that the proposal conflicts with the terrestrial development plan framework relevant to land-based effects, including the Argyll and Bute Local Development Plan 2. Specifically, the proposal would have adverse impacts on the landscape, heritage, and community interests that the policies within this plan are designed to protect. These conflicts are directly attributable to the nature and location of the development, which the plan seeks to safeguard through its provisions.

Furthermore, the proposal is not only at odds with the local development plan but also with the National Planning Framework 4 when considered in its entirety. The applicant has not provided sufficient justification or evidence to demonstrate that these conflicts can be reconciled or mitigated. Consequently, the proposal remains inconsistent with the established development plan framework, underscoring its unsuitability in the current form.

1.1.705 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.

In considering the visual impact of the proposed development, it is important to acknowledge the limitations of the mitigation measures as they are represented through the submitted visualisation materials. While the applicant has adhered to NatureScot's visualisation guidance, which is a recognised standard, these materials inherently lack the capacity to fully convey the true scale and effect of the development as experienced in situ. This shortcoming is significant when assessing the effectiveness of any proposed mitigation designed to lessen visual intrusion.

NatureScot's guidance explicitly notes that printed visualisations are unable to replicate the scale a viewer perceives in the field. This limitation extends to wireline drawings, which are included within the same panoramic projections and are intended to supplement the photographic images. However, these wireline drawings are themselves technical renderings embedded within the visualisation framework and do not serve as an independent means to correct or enhance the viewer's understanding beyond the constraints of the accompanying photographs. Therefore, reliance on these materials may understate the actual visual impact and the degree to which mitigation measures can be expected to succeed.

Given these inherent constraints, it is prudent to approach the visual assessment with caution and to consider the possibility that the visual effects might be more pronounced than the submitted materials suggest. This underscores the necessity for comprehensive on-site evaluations and a robust consideration of alternative or additional mitigation strategies to address any residual visual effects that may not be fully captured in the visualisation evidence.

While mitigation measures 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.

1.1.706 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 baseline assessment recognises that the cultural significance of the heritage assets in question arises not merely from isolated features but from a broader experiential context. This includes elements such as pilgrimage routes, arrival by sea, movement through an active cultural landscape, and the interrelationships between monuments, spirituality, and the encompassing landscape and seascape. Crucially, these attributes are experienced dynamically through movement rather than from static viewpoints, highlighting the importance of capturing a sense of journey and lived experience in any heritage impact assessment.

Despite this recognition, Historic Environment Scotland's consultation responses, as recorded within the application documentation, indicate that the assessment has not fully addressed these wider experiential qualities. The request for additional viewpoints underscores a concern that the applicant's evaluation may inadequately represent the cultural landscape's holistic significance. This suggests that without a more comprehensive approach to capturing the dynamic and interconnected nature of the heritage assets, the assessment risks underestimating the true impact on their cultural value.

The practical consequence of the deficiencies 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 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.

1.1.707 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 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 essential planning and statutory requirements concerning island communities, notably neglecting the thorough assessment demanded by GEN 19 and paragraph 4.81 of the National Marine Plan. These provisions mandate that decisions affecting island communities be grounded in robust socio-economic evidence and adopt a precautionary approach where such evidence is insufficient. Furthermore, NPF4 Policy 11(c) alongside the Islands (Scotland) Act 2018 explicitly require that the interests of island communities be carefully evaluated and given due weight through meaningful engagement from the earliest stages through to the conclusion of any decision-making process.

Despite recognising that island communities warrant particular scrutiny, the applicant has not conducted the necessary assessment to comprehend fully the potential effects of the proposal on these communities. There is a clear absence of evidence demonstrating compatibility with sustainable island communities, and as such, the applicant has not satisfied the statutory duties owed to these populations. This omission represents a significant shortfall in meeting the standards set by relevant policy and legislation, undermining the integrity of the decision-making framework.

In conclusion, given the quantifiable lack of assessment and failure to discharge statutory obligations, the proposal cannot be considered compliant with the comprehensive planning and statutory duties designed to protect island communities. It is therefore appropriate that the proposal be refused on these grounds to ensure that the interests and sustainability of island communities are properly safeguarded.

1.1.708 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 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 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 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.

1.1.709 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, as presented, relies directly on the baseline conclusions established in the Environmental Impact Assessment. Given that the underlying assessments for landscape, heritage, and socio-economic factors have been demonstrated to understate effects, the starting point for cumulative evaluation is inherently flawed. Consequently, the combined effects of this proposal, when considered alongside other existing, consented, and foreseeable developments, are similarly underestimated.

This reliance on a reduced baseline means the cumulative assessment does not fully capture the scale or significance of the overall impact. By not accurately accounting for the true extent of individual effects, the analysis fails to provide a reliable measure of the aggregate consequences that cumulative development would impose on the environment and communities. This shortcoming undermines the robustness of the planning decision-making process.

In conclusion, the cumulative impact assessment is therefore unreliable, as it underrepresents the true combined effects due to the flawed baseline assessments. For these reasons, the assessment should not be afforded significant weight in support of the proposal, and further, more rigorous analysis is required to ensure that all cumulative impacts are properly understood and addressed.

1.1.710 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 in support of the application fails to provide sufficient environmental information to enable Scottish Ministers to make a fully informed decision. While the assessment is extensive in scope, it is not the breadth but the adequacy of the evidence that is decisive. The application identifies potential significant effects across multiple topics but either does not investigate these effects comprehensively or relies on methodologies that do not justify the conclusions drawn. For example, the landscape assessment's outcomes follow a distance-based pattern not supported by its own stated methodology; the heritage assessment does not adequately apply its integrity test; and the socio-economic assessment lacks place-specific analysis pertinent to the affected islands. Such deficiencies undermine the reliability of the mitigation measures proposed and their capacity to address environmental concerns effectively.

Furthermore, the application depends in part on future assessments, post-consent plans, ongoing monitoring, and additional approvals to manage impacts. However, these commitments do not satisfy the requirements of the EIA Regulations, which mandate that likely significant effects be clearly understood at the point of decision. The Scottish Ministers must base their determination solely on the evidence before them, without presuming that outstanding issues will be resolved later. The applicant has not demonstrated that the environmental information submitted meets this essential standard, thereby rendering the EIA insufficient for decision-making purposes.

1.1.711 Effects on Local Area

The applicant's assessment significantly underestimates the scale and significance of visual impacts on Iona. The Coastal Character assessment identifies the Sound of Iona as an area of high sensitivity with direct orientation toward the proposed development, extensive visibility, and a large geographical extent of change spanning approximately 21 kilometres. The turbines would extend across roughly 39 degrees of the horizon, affecting key views including the ferry crossing between Fionnphort and Iona. Similarly, the West Coast of Iona, assessed as highly sensitive with widespread visibility, is acknowledged by the applicant to experience significant effects across much of the island, including from Dùn Ì, the island's highest point. The magnitude of these impacts is further emphasised by comparison with Ben Hynish on Tiree, a 141-metre-high landmark visible from Iona at about 33 kilometres,

which would be visually dominated by turbines exceeding that height by approximately 194 metres at two-thirds of the distance.

Beyond visual effects, the applicant's evaluation inadequately addresses community and heritage impacts. Iona's internationally important monastic landscape, including the Abbey, the Nunnery, and the high crosses, is intrinsically linked to pilgrimage, arrival by sea, and movement through the landscape—elements central to its heritage significance. Historic Environment Scotland requested additional viewpoints, including from the ferry crossing, yet no visualisation is provided from elevated ground at Càrn Cùl ri Èirinn overlooking St Columba's Bay. Moreover, a household consultation revealed that 92 per cent of Iona residents object to the proposal, yet the applicant's own consultants, who identify habitability as a potential pathway of effect, fail to assess this critical issue. Taken together, these omissions and underestimations compromise the accuracy and completeness of the environmental and social impact evaluation for Iona.

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.

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.

1.1.712 Personal Observations

Finally, I would also ask the Scottish Ministers to consider: the islands are part of what makes Scotland unique and must not be spoilt in this way

1.1.713 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 676
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.

1.1.714 Legislative and Policy Framework

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

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

Given these deficiencies and the lack of demonstrated compliance with the statutory duties under Schedule 9, the application conflicts with the applicable legal and policy framework. As established, where such conflicts or omissions exist, they weigh decisively against the granting of consent. Therefore, the application should be

refused on the basis that it does not meet the mandatory statutory requirements of the Electricity Act 1989.

The marine licence application 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 applicant's submission acknowledges that National Planning Framework 4 (NPF4) is a significant material consideration that must be applied alongside relevant statutory duties and legislative requirements. The proposal engages several key policies within NPF4, specifically Policy 3 (Biodiversity), Policy 4 (Natural Places), Policy 7 (Historic Assets and Places), and Policy 11 (Energy). However, the evidence before the determining authority fails to demonstrate compliance with these policies. There are clear deficiencies and omissions in the applicant's evidence that result in conflicts with the applicable legal and policy framework. In particular, the lack of adequate assessment and mitigation measures for biodiversity and natural places, insufficient consideration of impacts on historic assets, and failure to meet energy policy requirements collectively indicate non-compliance. As established by the framework, where such compliance has not been demonstrated, these matters weigh against the granting of consent. Therefore, on the basis of the applicant's own evidence and the requirements of NPF4, the proposal does not accord with the relevant policies and should be refused.

The applicant's submission acknowledges the statutory requirements under 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. Additionally, the applicant recognises that the Habitats Regulations impose a duty to assess the effects of the proposal on European protected sites in accordance with the relevant statutory tests. These legal frameworks establish a clear procedural and substantive threshold that must be met to ensure informed decision-making and environmental protection.

However, the evidence before the determining authority reveals that the applicant has failed to demonstrate compliance with these statutory requirements. The environmental impact assessment submitted does not adequately identify or assess all likely significant environmental effects, and the habitats regulations assessment is incomplete, lacking the necessary statutory tests and detailed evaluation of potential impacts on European protected sites. These deficiencies and omissions constitute a failure to meet the mandatory legal standards set out in the relevant regulations. The absence of a comprehensive and robust assessment undermines the reliability and sufficiency of the environmental information provided.

Given these shortcomings, the proposal conflicts with the applicable legal and policy framework governing environmental impact assessment and habitats regulations compliance. Where compliance has not been demonstrated, and where evidence identifies such deficiencies and omissions, these matters must weigh decisively against the granting of consent. The failure to provide an adequate environmental impact assessment and habitats regulations assessment is a fundamental procedural and substantive defect that precludes lawful approval of the proposal.

The applicant’s submission acknowledges the statutory requirement under the Islands (Scotland) Act 2018 that the interests of island communities must be considered and given due weight in the decision-making process. This legislative framework, as set out in the Act, establishes a clear duty to ensure that the unique social, economic, and environmental characteristics of island communities are properly accounted for when determining planning applications that may affect them.

However, the evidence before the determining authority does not demonstrate compliance with this statutory duty. There are notable deficiencies and omissions in the applicant’s assessment regarding the specific impacts on island communities. The submission fails to provide a comprehensive evaluation of how the proposal would affect these communities, nor does it adequately weigh their interests in accordance with the requirements of the Islands (Scotland) Act 2018. This lack of thorough consideration constitutes a procedural defect in the planning application process.

Given that the applicant has not demonstrated compliance with the statutory duty, and that the evidence identifies clear shortcomings in addressing the interests of island communities, these matters must weigh against the granting of planning consent. The failure to properly consider and give due weight to the interests of island communities is a material consideration that conflicts with the applicable legal and policy framework established by the Islands (Scotland) Act 2018. Therefore, the proposal should be refused on this basis.

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.

1.1.715 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.

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.

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.

1.1.716 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.

The introduction of aviation and navigation lighting to an otherwise unlit sea horizon will permanently alter the character of the night-time seascape for the full 35-year operational period of the development. This change is not merely a temporary inconvenience; it represents a fundamental and lasting transformation of the visual environment. Moreover, from a policy perspective, granting consent for this development effectively endorses the suitability of this seascape for wind farm use, thereby setting a precedent for future decisions. Such implications must be carefully weighed in considering the acceptability of the proposal.

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.

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

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

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

The application 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.

1.1.718 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.

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 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.

1.1.719 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 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.

Developers must recognise that consent for projects potentially impacting protected habitats cannot be granted unless it is conclusively demonstrated that there will be no adverse effect on the integrity of the designated site. The legal framework, as established under the Habitats Regulations, imposes a high evidential threshold: consent is lawful only if no reasonable scientific doubt remains regarding the absence of harm. This places the onus squarely on the applicant to provide robust evidence. Importantly, proposals relying solely on mitigation, compensation measures, or future monitoring fail to satisfy these statutory requirements.

This strict approach is further reinforced by relevant planning policies, including GEN 9 and GEN 13 of the National Marine Plan, alongside NPF4 Policies 3, 4(b), 4(e), and 4(f). Together, these establish a comprehensive policy context that echoes the imperative of protecting sensitive habitats and species. Accordingly, any application must not only meet the legal criteria but also align with these policy standards to secure consent, underscoring the necessity for rigorous scientific evidence from the outset.

The applicant has failed to demonstrate 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.

1.1.720 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 baseline evaluations that have themselves been demonstrated to understate the effects on landscape, heritage, and socio-economic factors. This foundational underestimation compromises the integrity of the cumulative assessment, as it effectively begins from an already diminished baseline. Consequently, the combined effects of the current proposal, when considered alongside existing, consented, and foreseeable developments, are systematically undervalued.

Given that the cumulative assessment is contingent upon these flawed baseline conclusions, the overall appraisal cannot be regarded as reliable. The true extent of the cumulative impacts is therefore likely to be greater than that indicated, with significant implications for the adequacy of proposed mitigation measures. It follows that decision-makers should exercise caution in accepting the current assessment’s findings without further, more rigorous baseline analyses to ensure that cumulative effects are accurately identified and addressed.

The applicant’s submission 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.

1.1.721 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.

There remains significant uncertainty regarding the sufficiency of the Environmental Impact Assessment submitted with this application. While the assessment is extensive in scope, its adequacy for informed decision-making is fundamentally in question. Across multiple topic areas, the application identifies pathways to significant effects but either fails to investigate these effects fully or relies on assessment methodologies that do not substantiate the conclusions presented. For example, the landscape assessment employs a distance-based outcome pattern not supported by its own stated methodology. Similarly, the heritage assessment does not adequately demonstrate the application of its integrity test, and the socio-economic assessment lacks a place-based analysis specifically addressing the affected islands. These shortcomings collectively undermine confidence in the reliability of the environmental information provided.

Moreover, the application's dependence on future assessment stages, post-consent plans, monitoring regimes, and subsequent approvals is incompatible with the requirements of the Environmental Impact Assessment Regulations. The Regulations mandate that likely significant effects must be understood and evaluated prior to determination, not deferred to later stages. The Scottish Ministers are therefore required to make their decision based on the evidence currently before them, without assuming that unresolved issues will be satisfactorily addressed in the future. Given that the applicant has not demonstrated the adequacy of the environmental information as submitted, it follows that the assessment is insufficient to support a fully informed and lawful determination of this application.

1.1.722 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.

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 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 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 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 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 consistently moderates and discounts the magnitude of change for highly sensitive receptors located beyond approximately 20 kilometres. This systematic approach results in a failure to provide any place-based assessment for the communities living with those effects. Such an omission significantly undermines the integrity of the environmental impact assessment by underestimating the true extent and significance of impacts on these distant yet sensitive receptors. In conclusion, the applicant’s distance-based methodology is demonstrably inadequate in capturing and addressing the full range of environmental effects beyond the 20-kilometre threshold.

1.1.723 Personal Observations

Finally, I would also ask the Scottish Ministers to consider: If Scotland is currently self sufficient in renewable energy why are we wantingly destroying what should be protected marine habitat and landscape?

1.1.724 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 677
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.

1.1.725 Legislative and Policy Framework

The application fails to demonstrate that reasonable steps have been taken to mitigate adverse effects on the natural beauty, flora, fauna, and geological or physiographical features of special interest, as required under Schedule 9 of the Electricity Act 1989. The statutory duty explicitly mandates that the applicant must have regard to these environmental and heritage interests and implement appropriate mitigation measures to address any negative impacts arising from the proposal. However, the evidence submitted does not adequately detail such mitigation efforts, nor does it provide sufficient assurance that these interests will be preserved or conserved to the extent required by law. This shortfall represents a fundamental deficiency in the application’s compliance with the statutory framework.

Furthermore, the Scottish Ministers, in determining this application, are legally obliged to have regard to the same statutory duties under Schedule 9. The absence of demonstrated compliance, coupled with identified omissions and deficiencies in addressing these duties, constitutes a clear conflict with the applicable legal and policy framework. As established by the evidence, where such compliance is not shown, these matters must weigh against the granting of consent. Consequently, the application should be refused on the grounds that it does not meet the statutory requirements to preserve natural beauty, conserve important ecological and geological features, or protect sites and objects of architectural, historic, or

archaeological interest, nor does it satisfactorily mitigate adverse effects on these protected interests.

The marine licence application fails to demonstrate compliance with the statutory requirements of the Marine (Scotland) Act 2010 and the relevant policies of Scotland's National Marine Plan, thereby precluding lawful authorisation. Under Part 4 of the Marine (Scotland) Act 2010, decisions on marine licences must be taken in accordance with the National Marine Plan unless relevant considerations indicate otherwise. The application does not meet this threshold.

Specifically, the application does not adequately address compliance with key General Policies including GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 and paragraph 4.85 on Cumulative Impacts. These policies are integral to the statutory assessment process.

The evidence identifies clear deficiencies and omissions in the application's supporting information and assessment against these policies. There is no demonstration that the proposal can coexist appropriately with other marine users as required by GEN 4. The historic environment considerations under GEN 6 are inadequately addressed, failing to meet the standards set out in paragraphs 4.22 to 4.23. Landscape and National Scenic Area impacts under GEN 7 remain unassessed in accordance with paragraph 4.28. Natural heritage impacts under GEN 9 are not sufficiently evidenced. The engagement process required by GEN 18 is not satisfactorily documented. The application lacks sound evidence as mandated by GEN 19 and paragraph 4.81, and it fails to properly consider cumulative impacts as required by GEN 21 and paragraph 4.85.

Where compliance with these statutory policies has not been demonstrated, and where the evidence reveals deficiencies and conflicts with the legal and policy framework, these matters must weigh decisively against the granting of consent. The application's failure to meet these fundamental requirements renders it unacceptable and justifies refusal of the marine licence.

The 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 constitutes a material deficiency that weighs against the granting of consent.

National Planning Framework 4 explicitly requires that developments protect and enhance biodiversity, safeguard natural places, conserve historic assets, and ensure sustainable energy use. The evidence before the determining authority does not show that these policies have been satisfied. Where 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 in the decision-making process. In this case, the absence of demonstrated compliance with the relevant NPF4 policies means the proposal conflicts with the statutory and policy framework governing planning decisions.

Accordingly, the proposal's failure to adhere to the requirements of NPF4 Policy 3, Policy 4, Policy 7, and Policy 11 represents a clear breach of the national planning policy framework. This non-compliance is a substantive planning objection that should result in the refusal of planning permission.

The applicant's submission acknowledges that under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, the likely significant environmental effects of the proposal must be identified, assessed, and reported prior to any determination. Additionally, the Habitats Regulations mandate that the effects of the proposal on European protected sites be assessed in accordance with the applicable statutory tests.

However, the evidence before the determining authority reveals that compliance with these legal requirements has not been demonstrated. There are clear deficiencies and omissions in the environmental impact assessment and habitats regulations assessment submitted. The failure to adequately identify and assess the significant environmental effects, as well as the absence of a thorough habitats regulations assessment, constitutes a breach of the statutory framework governing such proposals.

Given these unresolved deficiencies and the lack of compliance with the mandatory legal and policy requirements, the proposal fails to meet the necessary environmental safeguards. Consequently, these shortcomings weigh decisively against the granting of consent.

The 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 submitted documentation that these interests have been properly identified, assessed, or integrated into the planning rationale. This omission represents a fundamental procedural deficiency, as the statutory duty to consider island communities is not a discretionary matter but a legal obligation. The absence of any substantive analysis or mitigation measures addressing the specific impacts on island communities indicates a failure to meet the statutory standard set out in the Act.

Given that compliance with the Islands (Scotland) Act 2018 has not been demonstrated, and that the evidence reveals clear omissions in the consideration of island community interests, these shortcomings must weigh decisively against the granting of consent. The legal and policy framework is explicit in requiring due weight to be accorded to island communities, and where this is not achieved, the proposal conflicts with the applicable statutory requirements. Consequently, the proposal should be refused on the basis that it does not satisfy the mandatory provisions of the Islands (Scotland) Act 2018.

The applicant bears the responsibility of demonstrating, through robust, objective and proportionate evidence, that every relevant statutory duty, planning policy and environmental assessment requirement has been satisfied. 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. The applicant's submission must therefore provide clear and comprehensive proof that all applicable obligations have been met without exception.

In this case, the applicant has failed to discharge this burden. The evidence submitted does not demonstrate compliance with all relevant legal and policy requirements, and instead reveals deficiencies, omissions and conflicts with the applicable frameworks. Such failures are material and significant, and in accordance with established principles, these unresolved matters weigh decisively against the granting of consent. Without full and satisfactory demonstration of compliance, the application cannot lawfully or properly be approved.

1.1.726 Conflict with National Planning Framework 4 and the Development Plan

There remains considerable uncertainty as to whether the proposal fully complies with the impact criteria set out in NPF4 Policy 11, which governs support for renewable energy developments. While Policy 11 explicitly endorses such developments, this support is contingent upon satisfying specific impact tests, notably those addressing effects on communities under Policy 11(c), and on landscape, seascape, and other receptors under Policies 11(d) and 11(e). Detailed examination reveals that the proposal would result in significant adverse effects on nationally designated landscapes and seascapes. Furthermore, it has not been adequately demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, nor that the interests of island communities would be sufficiently safeguarded. Additionally, the ecological assessments submitted fail to confirm that the necessary environmental safeguards can be achieved. In light of these unresolved issues, the proposal conflicts with the impact criteria integral to NPF4 Policy 11.

The proposal fails to comply with multiple National Planning Framework 4 (NPF4) policies that safeguard nationally important landscapes, heritage assets, and biodiversity, resulting in significant adverse consequences for these designated assets. Specifically, Policy 11 must be read alongside Policy 4(c) and 4(d), which protect National Scenic Areas and nationally important landscapes from significant adverse effects on their defining qualities; Policy 7, including Policy 7(h) concerning scheduled monuments and Policies 7(c) and 7(d) regarding the setting of historic assets; and Policy 3 on biodiversity. The evidence clearly demonstrates that the proposal would cause significant adverse effects on nationally designated landscapes and seascapes, undermining the qualities for which these areas are protected. Furthermore, it has not been shown that the cultural significance of scheduled monuments and their settings would be preserved, nor that the interests of island communities would be adequately safeguarded. Additionally, the proposal fails to satisfy the ecological tests required by Policy 3, as the submitted evidence does not demonstrate that these tests can be met. In conclusion, the proposal is in conflict with key NPF4 policies intended to protect designated assets, and as such, should not be supported.

The applicant's evidence 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.

1.1.727 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.

While the visualisation materials submitted in support of the application follow NatureScot's established guidance, it is important to recognise their inherent limitations when compared to the actual experience of mitigation on site. Printed visualisations, including the wireline drawings incorporated within panoramic projections, are unable to replicate fully the scale and spatial relationships perceived by a viewer in the field. These technical renderings, rather than serving as independent corrections, function as components within the overall visualisation and therefore share its constraints in conveying an accurate sense of presence and impact.

This acknowledgement of technical and perceptual limitations suggests that reliance on such visual evidence alone may underrepresent the true extent of visual effects experienced locally. Consequently, a cautious approach is necessary when interpreting these materials, ensuring that any mitigation measures are evaluated not only through the lens of these visualisations but also through on-site assessments and other complementary forms of evidence. This balanced consideration will support a more robust understanding of the development's visual impact and the effectiveness of proposed mitigation.

While mitigation measures 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 assessment concludes that the proposed development fails to comply with key planning policies designed to protect landscape and seascape interests. Specifically, the effects identified engage provisions within NPF4 Policy 4(c) and 4(d), Policy 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan, all of which set clear standards for safeguarding nationally important environments.

Moreover, the applicant has not adequately demonstrated that the scale of the acknowledged effects aligns with the methodology employed in their assessment. This lack of internal consistency undermines the credibility of their findings and weakens any argument that the proposal adheres to the relevant policy requirements. Without robust evidence, the claimed compliance remains unsubstantiated.

In light of these considerations, the proposal does not meet the necessary criteria for protecting nationally important landscapes and seascapes as mandated by the referenced policies. Consequently, it is concluded that permission should be refused on the grounds of non-compliance with these critical planning provisions.

1.1.728 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 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 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 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.

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

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

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

1.1.730 Ecology, Biodiversity and Habitats Regulations

The development site encompasses Priority Marine Features and Annex I habitats directly within its boundaries, while the adjacent waters serve as habitat for seabirds, marine mammals, and basking sharks. The proposed project would introduce extensive construction, operational, and decommissioning activities into this ecologically sensitive environment over a period of several decades, representing a substantial and prolonged disturbance.

Given the presence of these designated habitats and protected species, the scale and duration of the development's impact warrant thorough consideration. The potential for significant adverse environmental effects arises from the disturbance,

habitat loss, and cumulative pressures associated with the proposed activities. This underscores the need for rigorous assessment and mitigation to address the ecological importance and vulnerability of the site and its surrounding marine environment.

The practical consequence of the applicant's submission is that potential adverse impacts on the North Colonsay and Western Cliffs Special Protection Area have been acknowledged and addressed through specific derogation and compensation documents. These include a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan, both directed at protecting the guillemot population within the designated site.

Such documents are customarily prepared when an adverse effect on the integrity of a protected site cannot be definitively ruled out. Their inclusion in the application signals the applicant's recognition that the proposed development may have significant environmental consequences requiring formal mitigation measures under derogation provisions. This approach demonstrates an awareness of the statutory responsibilities involved in safeguarding protected sites.

However, it is important to note that the submission of these documents does not guarantee agreement on the absence of harm. According to the applicant's own position, the Scottish Ministers may reach a different conclusion regarding the potential for adverse effects. This uncertainty underscores the need for careful scrutiny of the evidence and the adequacy of proposed compensation measures before any determination is made.

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 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.

1.1.731 Cumulative and In-Combination Effects

The assessment of the current project is fundamentally flawed because it considers only a portion of the development before the Scottish Ministers, with significant components such as the export cable corridor and the onshore transmission works deferred to future applications. These elements are essential for the wind farm's operation, yet their effects are excluded from the present evaluation. Consequently, the project's impacts are never assessed in their entirety, but rather fragmented across separate consenting processes that follow the principal decision. This piecemeal approach contravenes established legal principles, as affirmed by the courts in Raeshaw Farms, which require that a project must be assessed comprehensively rather than being artificially divided into smaller parts whose individual effects might appear less significant. Therefore, the current assessment does not satisfy the necessary procedural and legal standards for a holistic evaluation of the project's impacts.

The practical consequence of relying on the current cumulative impact assessment is that the true combined effects of the proposed development alongside existing, consented, and foreseeable projects are significantly underestimated. This has important implications for decision-makers who depend on accurate evaluations to fully understand potential environmental and socio-economic consequences. An understated baseline leads directly to an understated cumulative impact, which risks overlooking meaningful harm that may arise from the aggregate of developments in the area.

This problem arises because the cumulative assessments draw upon conclusions established elsewhere in the Environmental Impact Assessment. Specifically, where the foundational landscape, heritage, and socio-economic assessments have already minimized or failed to fully capture the extent of effects, the cumulative assessment necessarily begins from this flawed baseline. As a result, the combined effects are not properly accounted for, reducing the reliability of the overall assessment and weakening the evidential basis for planning decisions.

In light of this, the cumulative impact assessment cannot be considered a robust or trustworthy reflection of the likely combined effects of development in the locality. A more rigorous and comprehensive baseline evaluation is essential to ensure that cumulative assessments accurately reflect reality. Without this, the planning process risks proceeding on an incomplete understanding of potential impacts, which may lead to inadequate mitigation measures or inappropriate approval of proposals.

The 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.

1.1.732 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 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.

1.1.733 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 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.

While the applicant acknowledges certain significant effects on the Ross of Mull South coastal area, Erraid, and Fionnphort—key locations linked to visitor flows and community experience—the proposed mitigation does not sufficiently address the extent of visual and economic impacts on these sensitive areas. Notably, although the Ross of Mull South is assessed as having high sensitivity with significant effects accepted at distances of approximately 22 to 24 kilometres, the magnitude attributed remains only medium. Similarly, within the Loch na Keal National Scenic Area, characterised by high sensitivity over distances of 21 to 33 kilometres, the applicant limits the magnitude to medium despite recognising significant effects on Core Paths and local landscapes. This reliance on distance-based reasoning, such as dismissing effects on the Wilderness and Gribun Rocks coastal area due to viewing distances exceeding 30 kilometres, fails to adequately capture the scale of change and its implications for these designated landscapes.

Furthermore, the applicant's assessment overlooks the broader economic and community consequences for Mull's west-facing tourism economy and its wildlife boat operations, both of which are intrinsically linked to the unspoiled Atlantic seascape that the development would industrialise. The accommodation and livelihood of western townships, which depend heavily on this natural environment, have not been subject to place-based assessment. This omission undermines a comprehensive understanding of the development's impact on tourism-dependent communities whose economic vitality is closely connected to the visual integrity and experiential quality of the coastal and seascape environment. Therefore, the assessment inadequately addresses the significant visual, economic, and community effects on Mull and Ross of Mull, warranting a more thorough and place-specific evaluation.

The applicant's assessment acknowledges the effects on designated landscapes within the Loch na Keal National Scenic Area, including Ulva, Staffa, Jura, and the Scarba, Lunga and Garvellachs National Scenic Area, but this evaluation underestimates significant impacts on these sensitive sites and their communities. Ulva, a community-owned island at the onset of regeneration, depends

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

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

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

The applicant's assessment 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.

1.1.734 Personal Observations

Based on my own local knowledge, I also wish to highlight that: It is wrong to destroy places with such deep culture

1.1.735 Summary

The proposal submitted fails to demonstrate compliance with the applicable statutory and policy framework governing its determination. The applicant's own evaluation acknowledges the presence of significant impacts on nationally designated landscapes, as well as on the local communities and heritage along this coastal region. Independent scrutiny of the submitted documentation reveals that these impacts have been understated, and that the necessary heritage assessment has not been conducted. Furthermore, while the effects on the island communities concerned were identified, no assessment of these impacts has been undertaken. The ecological requirements stipulated by law have not been proven to be satisfied. Additionally, the application before the Scottish Ministers addresses only a portion of the overall project.

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

Should the Ministers consider granting consent, I request that they require the submission of further environmental information and enhanced visual representations. Moreover, I advocate that the determination of these applications be deferred until a public inquiry is held, thereby enabling a thorough examination of the issues raised in this objection. Regardless of the final decision, I seek a clear and

explicit statement from the Ministers regarding their conclusions on the impacts to cultural heritage and the affected island communities.

Yours faithfully,

[Redacted]

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

Member of the public 678
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.

1.1.736 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 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.

The applicant's evidence acknowledges that the development would introduce aviation and navigation lighting to a sea horizon that is currently unlit, thereby permanently altering the character of the night-time seascape for the proposed 35-year operational life. This impact is not limited to the operational timeframe, as consenting to the development effectively designates this seascape as suitable for wind farm use, establishing a lasting precedent in policy terms. Such a permanent change to the night-time seascape character raises significant concerns regarding the visual and environmental effects of artificial lighting in an area hitherto free from such illumination. Consequently, careful consideration must be given to the implications of this alteration in the context of seascape protection and planning policy.

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.

1.1.737 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 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 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 application fails to demonstrate compliance with crucial policy requirements designed to protect heritage assets of international and national importance, thereby undermining its acceptability. Specifically, it does not meet the standards set out in National Planning Framework 4 (NPF4), including Policy 7(h) concerning scheduled monuments, as well as Policies 7(c) and 7(d) relating to their setting, alongside GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. These policies collectively establish a clear framework for safeguarding the cultural significance of heritage sites, which the application must satisfy.

The applicant has not provided sufficient evidence to show that the cultural significance of these heritage assets and their settings will be preserved. This absence of a thorough and credible assessment means the Scottish Ministers do not

have before them the necessary information to conclude that the proposal aligns with the statutory and policy protections required. Without this demonstration, the application cannot be considered compliant with the relevant heritage protection policies.

Given these shortcomings, the proposal should be regarded as failing to meet essential policy tests for heritage asset protection. As such, it is respectfully submitted that the application should not be approved in its current form. Robust compliance with heritage policies is fundamental to ensuring that nationally and internationally significant cultural assets are preserved for future generations.

1.1.738 Effects on Island Communities, Tourism and the Local Economy

The proposal presents a clear and immediate risk to the economic foundation of the island communities, which rely heavily on visitors drawn by distinctive local qualities. The applicant's own baseline assessments acknowledge that visitors are attracted specifically by the landscape, seascape, cultural heritage, tranquillity and remoteness of these islands. Any alteration to these attributes would undermine the very reasons visitors choose to come.

This dependence on visitor-generated income is not merely an economic matter; it is intrinsically linked to the social fabric and viability of the communities. The local services that residents depend upon are sustained by this visitor economy. Should these qualities be diminished, a resulting decline in visitors would lead to reduced income, threatening the provision of essential services and potentially prompting population loss as livelihoods become unsustainable.

In sum, the proposal threatens to destabilise the fundamental economic and social sustainability of these island communities. Protecting the qualities that attract visitors is therefore critical to maintaining their continuing viability. Any development that compromises these key attributes risks undermining the communities' future as living, vibrant places.

While 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.

1.1.739 Ecology, Biodiversity and Habitats Regulations

The development site encompasses Priority Marine Features and Annex I habitats, indicating the presence of ecologically significant environments within the area proposed for construction. Surrounding waters are known to support a range of protected species, including seabirds, marine mammals, and basking sharks. The introduction of large-scale activities associated with construction, operation, and eventual decommissioning would extend over several decades, imposing sustained pressures on these sensitive marine ecosystems.

Given the ecological importance of the site and the longevity of the proposed development's operational phases, there is a substantial potential for significant adverse environmental effects. The interaction between extensive human activity and the existing marine biodiversity necessitates thorough consideration, as disturbance and habitat alteration could compromise the integrity of Priority Marine Features and the viability of protected species populations. This assessment forms a critical basis for evaluating the environmental acceptability of the proposal.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically addressing the guillemot population at 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 this application highlights the applicant's acknowledgement of potential impacts on this designated area.

These submissions indicate the applicant's intention to comply with relevant derogation provisions, seeking to mitigate any identified harm through appropriate compensation measures. The focus on the guillemot population underscores the recognised sensitivity of this species within the Special Protection Area, and the need for targeted management strategies to address potential ecological consequences.

Nonetheless, it remains clear that the applicant's position anticipates a degree of uncertainty, as they acknowledge that the Scottish Ministers may ultimately reach a different conclusion regarding the likelihood of adverse effects. Therefore, while the submitted derogation and compensation documents form a key component of the application, further scrutiny will be necessary to establish whether the proposed measures are sufficient to satisfy statutory environmental safeguards.

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 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.

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

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

The 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.

1.1.741 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.

1.1.742 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 are the closest inhabited islands to the development site—lying immediately north-west and west respectively—the application primarily considers Islay only in terms of its potential as a project location, rather than as a distinct island community facing direct impacts. The Atlantic-facing settlements of Islay border the nearest edge of the 448 square kilometre development area, yet no place-based evaluation has been undertaken to understand the implications for their local setting, economic activities, or community life.

For Colonsay and Oronsay, whose daily lives are defined by a seaward outlook directly facing the development, the applicant's assessment similarly falls short. The North Colonsay and Western Cliffs Special Protection Area, located on Colonsay's own coastline, is central to the applicant's derogation case and compensation plan, acknowledging that harm to its internationally protected seabird population cannot be excluded. Furthermore, Oronsay Priory, a scheduled monument of national importance, lies within this community's area, yet the heritage assessment fails to adequately address the impacts on its open maritime setting. These gaps collectively undermine the reliability of the environmental and heritage impact evaluation submitted.

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

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

The applicant's assessment fails to address significant effects on mainland and island communities whose outlooks and economies are closely tied to the seascape in question, thereby undermining the comprehensiveness of the evaluation. Gigha, a community-owned island renowned nationally as a symbol of island regeneration following its purchase by residents, faces the development from the east, yet no examination has been made of how the proposal might impact its delicately balanced community and economy. Similarly, Ardnamurchan Point, as the most westerly 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 that the objection identifies, yet they remain unassessed. Furthermore, the west coast of Kintyre comprises a

chain of communities whose character and visitor economy are defined by the open Atlantic seaboard facing Islay, Jura, and the wider waters beyond. The Treshnish Isles, along with other small islands and mainland coasts viewing the development area, share this position and their sensitivities have been overlooked. Collectively, these omissions represent a substantial gap in the assessment, which compromises the ability to fully understand and mitigate the proposal’s potential impacts on these valued seascapes and dependent communities.

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.

1.1.743 Personal Observations

In addition to the planning matters above, I am personally concerned because: Iona and the Islands surrounding it are profoundly spiritual places with local economies built on visitors like me. I have travelled across the world to Iona for renewal and inspiration many times because there is no where else like it. The developments impact on the bird and marine life and the natural world of this area is a desecration that should not be allowed. Iona has deep spiritual heritage and visitors are able to experience an untouched world like that when St. Columba landed almost 2000 years ago. That can never be recovered if this goes forward. This will ruin the essence of what makes this region a jewel of Scotland.

Based on my own local knowledge, I also wish to highlight that: I greatly value the pristine natural worlds of Iona and Mull. The large flock of puffins at Staffa are a natural wonder. I've visited several times and they fly up to be by humans and communicate with one another away from predators. The Iona community has been a great steward of the deep Scottish and Christian history and heritage of the island. The stillness and peace of Iona is what makes it a miracle - a "thin place" recognized across the world for it's closeness to God and the spiritual realm. This massive project and turbines will ruin that. So much of the world is already full of motors, cars, highways, and massive developments. This place is profound and unique. The natural world has an oasis. It is wrong to ruin it.

Finally, I would also ask the Scottish Ministers to consider: Iona and this region seems like an easy target for this development because there won't be as many voices saying "not in my back yard." But destroying the profound quality of this special place is destroying something deep about the land, beauty, history and magnificence of Scotland that cannot be replaced. People come from across Scotland and all over the world to experience it again and again. Please don't destroy it. Please don't let that be your legacy.

1.1.744 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 679
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.

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

Furthermore, the application exhibits significant deficiencies and omissions in its evidence base, failing to provide the sound evidence mandated by GEN 19 and paragraph 4.81 of the National Marine Plan. This lack of robust and comprehensive data impedes a proper evaluation of potential impacts on the historic environment, natural heritage, and landscape character, as required by the relevant policies. The failure to adequately consider cumulative impacts, as stipulated in GEN 21 and paragraph 4.85, further compounds the shortcomings of the application, leaving unresolved uncertainties that are material to the decision-making process.

Given these unresolved conflicts with the applicable legal and policy framework, and the absence of demonstrated compliance with the National Marine Plan's General Policies, the application does not meet the statutory criteria for granting consent under the Marine (Scotland) Act 2010. In accordance with the established guidance that where compliance has not been demonstrated or where deficiencies exist, these matters weigh against authorisation, the application should be refused.

The proposal fails to comply with essential policies set out in National Planning Framework 4 (NPF4), specifically Policies 3, 4, 7, and 11, which address biodiversity, natural places, historic assets, and energy respectively. As a significant material consideration, NPF4 must be applied in conjunction with statutory duties and legislative requirements. The absence of demonstrated compliance with these policies results in a clear conflict with the established legal and policy framework, thereby weighing decisively against the granting of planning consent.

The submitted evidence does not establish that the proposal meets the requirements of Policy 3 concerning biodiversity protection and enhancement. Similarly, the application falls short of satisfying Policy 4's provisions for safeguarding natural places, failing to provide adequate assessment or mitigation measures to address potential adverse impacts. Furthermore, the proposal does not demonstrate conformity with Policy 7, which mandates the protection and appropriate management of historic assets and places, leaving unresolved concerns about harm to heritage significance. Lastly, the application does not comply with Policy 11 on energy, lacking sufficient evidence to confirm alignment with energy efficiency and sustainability objectives prescribed by NPF4.

Given these substantive deficiencies and omissions, the proposal is in direct conflict with the relevant policies of NPF4 and the associated statutory and legislative requirements. The failure to demonstrate compliance or to address identified conflicts and evidential shortcomings means that the proposal cannot be considered acceptable in planning terms. Consequently, these matters must be afforded significant weight in the determination process and constitute compelling grounds for refusal of planning permission.

The applicant's submission must be considered in light of the statutory requirements set out in The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations, which mandate that any proposal's likely significant environmental effects be thoroughly identified, assessed, and reported prior to determination. This procedural obligation ensures that decision-makers have a comprehensive understanding of potential environmental impacts before granting consent.

Furthermore, the Habitats Regulations impose a legal duty to assess the effects of the proposal on European protected sites through the appropriate statutory tests. This assessment is critical to safeguard designated habitats and species from adverse impacts arising from development proposals. The evidence before the determining authority does not demonstrate compliance with these requirements, as the necessary assessments have not been adequately provided or substantiated.

Given the absence of demonstrated compliance and the presence of deficiencies and omissions in the environmental impact and habitats regulations assessments, the proposal conflicts with the applicable legal and policy framework. Such failures weigh decisively 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, thereby undermining a fundamental statutory requirement that must inform the decision-making process. The Islands (Scotland) Act 2018 explicitly requires that the interests of island communities be taken into account and given due weight when determining planning applications affecting such communities. This statutory obligation is not discretionary but a legal imperative designed to ensure that the unique circumstances and needs of island populations are adequately reflected and protected in planning decisions.

In this instance, the evidence before the determining authority does not demonstrate compliance with this statutory duty. There is a clear absence of any substantive assessment or meaningful engagement that addresses how the proposal impacts the island community's social, economic, or environmental interests. The failure to provide such consideration constitutes a significant omission and a procedural deficiency in the planning process. Without a proper evaluation of the proposal's effects on the island community, the decision-making framework is incomplete and legally flawed.

Furthermore, where compliance with the Islands (Scotland) Act 2018 has not been demonstrated, or where the evidence reveals deficiencies or omissions in addressing the interests of island communities, these shortcomings must weigh against the granting of planning consent. The statutory framework and associated

policy guidance are unequivocal in requiring that such failures be treated as material considerations adverse to the proposal.

In conclusion, the proposal does not meet the requirements of the Islands (Scotland) Act 2018 due to its failure to properly consider and give due weight to the interests of island communities. This failure represents a fundamental legal and procedural defect that should result in the refusal of planning permission.

The practical consequence of the applicant's failure to discharge the evidential burden of proof is that the planning application cannot lawfully be granted consent. It is a fundamental principle that the applicant must demonstrate, by means of robust, objective, and proportionate evidence, that every relevant statutory duty, planning policy, and environmental assessment requirement has been fully satisfied. This responsibility is not discretionary but mandatory, ensuring that decision-makers can properly assess compliance with the comprehensive legal and policy framework governing the proposal.

In this case, the applicant has not fulfilled this essential evidential obligation. The submitted documentation lacks the necessary rigor and completeness to confirm that all applicable statutory duties and planning policies have been met. There are clear deficiencies and omissions within the evidence presented, which undermine confidence in the applicant's compliance claims. Moreover, where the evidence does exist, it reveals conflicts with the relevant legal and policy requirements, further demonstrating non-compliance.

Given these shortcomings, the application fails to meet the threshold of proof required to establish lawful conformity with the planning and environmental regime. The absence of satisfactory evidence to demonstrate compliance means that the statutory and policy framework has not been properly engaged or satisfied. Consequently, these unresolved evidential gaps and conflicts must weigh decisively against the granting of planning consent.

In conclusion, the applicant has not discharged the burden of proof to demonstrate compliance with all relevant legal and policy requirements. The deficiencies, omissions, and conflicts identified in the evidence are material and substantive, rendering the application incapable of lawful approval. Therefore, the application should be refused on the basis that the applicant has failed to meet the fundamental responsibility to provide robust and objective evidence of compliance.

1.1.746 Conflict with National Planning Framework 4 and the Development Plan

While NPF4 Policy 11 is designed to support renewable energy development, this support is expressly conditional upon compliance with the policy's impact criteria, including those relating to effects on communities and landscapes as set out in Policy 11(c), (d), and (e). The proposal in question fails to meet these critical tests. Unlike developments that successfully mitigate harm to designated landscapes or communities, this proposal does not demonstrate adequate measures to address the significant adverse effects it would impose on nationally designated landscapes and seascapes. The absence of effective mitigation undermines any claim that the

development aligns with the policy's requirements, as the adverse impacts remain substantial and unresolved.

Moreover, the proposal does not sufficiently safeguard the cultural significance of scheduled monuments or their settings, nor does it provide convincing evidence that island communities would be protected from detrimental effects. The ecological assessments submitted also fall short of demonstrating that the necessary environmental safeguards can be achieved. Taken together, these deficiencies mean that the proposal conflicts fundamentally with the impact criteria embedded within NPF4 Policy 11. Consequently, the proposal cannot be supported on the basis that it fails to satisfy the policy's essential conditions for renewable energy developments.

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 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.

1.1.747 Seascape, Landscape and Visual Effects

The applicant's methodology as set out in Appendix 16.1 notably lacks a defined distance threshold beyond which major effects are considered to cease. However, an independent Evidence Note, prepared to support community objections and drawing solely from the applicant's Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern across all three assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of that receptor's sensitivity or the extent of its visibility. This pattern is further corroborated by the applicant's own documentation, which explicitly acknowledges the influence of distance in its judgements. For example, an assessment of a coastal area situated over 30 kilometres away states that the scale of change is judged to be small given the viewing distance. Moreover, the Landscape Character synthesis delineates magnitude categories with High magnitude assigned within roughly 20 kilometres, Medium between about 20 and 30 kilometres, and Low beyond approximately 30 kilometres for certain landscape types.

This implicit distance moderation has significant implications for the reliability of the assessment outcomes. By systematically reducing magnitude ratings at distances coinciding with the locations of the most sensitive designated landscapes, the methodology inherently understates the inputs to the protective tests required under planning policy. As a result, the conclusions drawn from the assessment do not provide an accurate or dependable description of the effects that the Scottish Ministers are being asked to consent to. Such an approach risks overlooking or downplaying the true extent of landscape and visual impacts on highly sensitive receptors situated beyond the arbitrary distance markers effectively imposed by the applicant's methodology. In light of this, the assessment's reliability is called into question, and greater scrutiny or revision of the distance-related parameters is warranted to ensure robust and transparent evaluation of potential effects.

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

The 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 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.

1.1.748 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 recognises certain mitigation measures aimed at reducing harm to heritage assets, it is important to consider whether these adequately address the broader cultural landscape and experiential qualities that confer significance. The baseline evidence acknowledges that the cultural value of

the affected heritage assets is not solely derived from static features but from dynamic qualities such as pilgrimage routes, arrival by sea, and movement through a living cultural landscape. This suggests that mitigation focused primarily on fixed viewpoints may fall short of fully preserving these experiential aspects.

Historic Environment Scotland's consultation responses, as recorded within the application, underscore this concern by requesting additional viewpoints to better capture the wider cultural qualities. Their input implies that the existing assessment may not sufficiently represent the spatial and sensory relationships between monuments, the surrounding landscape, and seascape. Such relationships are integral to understanding heritage significance, as they are experienced through movement rather than from isolated vantage points.

In light of these considerations, it appears that the assessment's current approach may understate the importance of the broader cultural landscape and its experiential dimensions. Consequently, further evaluation and potentially enhanced mitigation measures are warranted to ensure that the full range of heritage values is appropriately recognised and conserved.

The 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.

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.

1.1.749 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.

While the applicant's assessment methodology addresses potential impacts on port communities with detailed analysis, it notably lacks an equivalent, place-based evaluation of the island communities directly facing the development. The applicant's own consultants acknowledged habitability as a potentially significant pathway affecting these island communities; however, no specific assessment of island habitability was conducted. Instead, the socio-economic assessment in Chapter 18 operates at a broad regional level and concludes that island communities exhibit low sensitivity to tourism effects. This approach is fundamentally flawed because small island economies cannot be accurately represented by regional averages. Their economies are concentrated in sectors highly vulnerable to changes in the attributes that attract visitors, and an increasing reliance on visitor numbers exacerbates their sensitivity rather than diminishes it. Therefore, the conclusion of low sensitivity, derived without any place-based analysis, constitutes an unsupported assumption rather than evidence. Consequently, the applicant's socio-economic assessment is inadequate to understand or mitigate the true impacts on island communities.

The proposal fails to 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.

1.1.750 Ecology, Biodiversity and Habitats Regulations

While mitigation measures may be proposed to address environmental impacts, it is important to recognise that Priority Marine Features and Annex I habitats are present

within the development area itself, with surrounding waters supporting seabirds, marine mammals, and basking sharks. Introducing construction, operational, and decommissioning activities at a very large scale over several decades would inevitably pose significant risks to these sensitive ecological receptors. Given the intrinsic ecological importance of the site and its vulnerability, the potential for significant adverse environmental effects from the proposed development cannot be adequately discounted.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically addressing the guillemot population at the North Colonsay and Western Cliffs Special Protection Area. Such documents are typically prepared in circumstances where an adverse effect on the integrity of a protected site cannot be definitively ruled out. Their inclusion in this application highlights the applicant’s acknowledgement of potential impacts on this designated area.

These submissions indicate the applicant's intention to comply with relevant derogation provisions, seeking to mitigate any identified harm through appropriate compensation measures. The focus on the guillemot population underscores the recognised sensitivity of this species within the Special Protection Area, and the need for targeted management strategies to address potential ecological consequences.

Nonetheless, it remains clear that the applicant’s position anticipates a degree of uncertainty, as they acknowledge that the Scottish Ministers may ultimately reach a different conclusion regarding the likelihood of adverse effects. Therefore, while the submitted derogation and compensation documents form a key component of the application, further scrutiny will be necessary to establish whether the proposed measures are sufficient to satisfy statutory environmental safeguards.

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.

1.1.751 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.

The Environmental Impact Assessment submitted fails to provide sufficient information to enable the Scottish Ministers to reach a fully informed decision. Although it is comprehensive in scope, the assessment falls short in addressing key potential significant effects with adequate rigour. For instance, the landscape assessment relies on a distance-based pattern that is not supported by its own methodology, while the heritage assessment lacks clear evidence of applying its stated integrity test. Additionally, the socio-economic assessment omits a focused place-based analysis of the affected islands, undermining its relevance. Crucially, the application defers consideration of certain impacts to future post-consent plans, monitoring, and additional approvals, yet the EIA Regulations require that likely significant effects be clearly understood prior to determination. It is therefore imperative that decisions are made on the basis of the evidence presently before the Scottish Ministers, not on assumptions that outstanding issues will be satisfactorily resolved later. The applicant has not demonstrated that the environmental information provided meets this essential standard.

1.1.752 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 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.

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.

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.

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.

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

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

The applicant's environmental impact assessment systematically moderates and discounts the significance of effects on highly sensitive receptors located beyond approximately 20 kilometres. This approach results in a consistent underestimation of impacts, as evidenced by the treatment of these distant communities. Instead of conducting thorough, place-based assessments that accurately reflect the experiences of those affected, the assessment applies a broad-brush reduction in magnitude of change and effect significance once the 20-kilometre threshold is exceeded. Consequently, the assessment fails to capture the true extent and nature of environmental effects on these sensitive receptors. In conclusion, this distance-based methodology fundamentally undermines the integrity and reliability of the environmental impact assessment, as it neglects to properly evaluate and represent the impacts experienced by communities beyond this arbitrary boundary.

1.1.753 Summary

The proposal for the MachairWind Offshore Wind Farm fails to meet the requirements set out in 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, independent analysis of the submitted documents reveals that these impacts have been understated. Crucially, the necessary heritage assessment has not been completed, and while the effects on island communities were identified, they have never been properly evaluated. Additionally, the ecological criteria required to justify the development 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 substantial shortcomings, it is respectfully submitted that consent for the MachairWind Offshore Wind Farm, along with the associated marine licence, should be refused. Should the Scottish Ministers be inclined not to refuse consent outright, it is urged that they require the submission of further environmental information and enhanced visualisation materials. Moreover, it is requested that the applications should only be determined following a public inquiry, enabling a thorough examination of all matters raised in this objection. Regardless of the outcome, it is essential that the Ministers provide explicit and reasoned conclusions relating to the effects on cultural heritage and the impacted island communities within their 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 680
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.

1.1.754 Seascape, Landscape and Visual Effects

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.

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.

1.1.755 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of the proposed development's impact on the setting of historic assets does not fully comply with the recognised methodology established by Historic Environment Scotland. While the applicant claims to have adopted this methodology, which necessitates evaluating whether changes to setting affect its contribution to the cultural significance of heritage assets and whether the integrity of that setting is adequately retained, the assessment fails to demonstrate this critical evaluative step. Notably, the methodology explicitly states that visual change should not be directly equated with adverse impact, yet the applicant's analysis appears to overlook this distinction.

A detailed Methodological Audit, prepared in support of community objections and based solely on the applicant's Appendix 14.3, reveals that although the assessment identifies relevant heritage attributes such as visibility, distance, monument prominence, retained views, screening, and skyline occupation, it stops short of showing how the integrity of setting has been assessed in accordance with the applicant's own accepted methodology. The Audit finds that the assessment merely describes visual changes and then asserts that the integrity of setting is adequately retained without providing the necessary evaluative reasoning. This omission undermines the reliability of the applicant's conclusions regarding heritage impacts and calls into question the robustness of the assessment overall.

The applicant's 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.

There remains a degree of uncertainty surrounding the reliability of the heritage impact conclusions presented. This uncertainty chiefly arises from the dependence

of these conclusions on the underlying landscape assessment. As noted, where the landscape effects have been understated, as previously demonstrated, the heritage conclusions that rely on this assessment inevitably inherit the same understatement. Consequently, any deficiencies in the landscape evaluation directly undermine the credibility of the heritage impact findings, casting doubt on the robustness of the overall appraisal.

1.1.756 Effects on Island Communities, Tourism and the Local Economy

The applicant's own baseline evidence confirms that the island communities affected by this proposal rely exceptionally heavily on visitors who are drawn specifically by the qualities of landscape, seascape, cultural heritage, tranquillity and remoteness. Any alteration to these attributes directly threatens the fundamental economic foundations of these communities. This economic impact would inevitably undermine local services, diminish population levels, and jeopardise the long-term social and economic sustainability of the islands. Given this dependency, the proposal poses a significant risk to the continued viability of these communities.

The 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.

1.1.757 Effects on Local Area

The applicant's assessment falls short in adequately addressing the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, undermining the reliability of the environmental and heritage impact evaluation. While mitigation and compensation measures are proposed for internationally protected seabird populations along Colonsay's North Colonsay and Western Cliffs Special Protection Area, these acknowledge that harm cannot be excluded but do not extend to a full place-based evaluation of the wider community impacts. Islay, situated immediately south-east of the 448 square kilometre development area, is principally considered only as a potential project location rather than as a community whose Atlantic-facing settlements confront the nearest edge of

the array. This oversight results in no substantive assessment of effects on Islay's setting, economy, or community life. Similarly, Colonsay and Oronsay's seaward outlooks, integral to daily life and cultural identity, face the array directly, yet the application fails to adequately assess the implications for these communities. Of particular concern is Oronsay Priory, a scheduled monument of national importance located within this area, whose open maritime setting is insufficiently addressed given the acknowledged gaps in the heritage assessment. Collectively, these deficiencies demonstrate that the applicant's evaluation does not reliably capture the full extent of impacts on these island communities, calling into question the sufficiency of the proposed mitigation and compensation measures.

The applicant's Coastal Character assessment recognises the Sound of Iona as an area of high sensitivity, noting its direct orientation towards the 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 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 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 Environmental Statement assesses the South Tiree coastal area as having High sensitivity at a distance of approximately 35 kilometres, yet attributes a

Low magnitude of change to the proposed development's visual impact. This evaluation forms the basis for their overall conclusion on the effects experienced by this receptor.

However, Tiree's landscape character is exceptionally distinctive and sensitive, being an exceptionally low-lying island where the dominance of sea and sky defines its sense of place. The island's highest point, Ben Hynish, rises to only 141 metres, and the open oceanic horizon contributes fundamentally to its character. The introduction of turbines reaching heights of up to 335 metres would present vertical structures unprecedented in Tiree's seascape. Given this context, the applicant's conclusion of a Low magnitude of change significantly understates the true scale of impact on this sensitive receptor, rendering the overall assessment unreliable.

The assessment fails to consider the significant visual and economic impacts on a range of mainland and island communities with direct views of the proposed development. Notably, Gigha—a community-owned island celebrated nationally as a symbol of island regeneration—faces the development site from the east, yet no examination has been made of how this may affect its delicately balanced community and economy. Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic seaward views that attract visitors along the entire peninsula; these very high-quality receptors have been subject to a distance-based moderation approach that underestimates their sensitivity.

Furthermore, the chain of communities along the west coast of Kintyre derive much of their character and visitor economy from their outlook over the open Atlantic seaboard towards Islay, Jura, and the adjacent waters. This distinctive seascape setting, which also includes the Treshnish Isles and other nearby small islands and mainland coasts facing the development area, shares the same unassessed vulnerability. The omission of these receptors from the applicant's assessment compromises the thoroughness and reliability of the environmental evaluation.

In conclusion, by neglecting to assess the effects on these key mainland and island communities—each with direct visual exposure and economic reliance on the seascape—the applicant's appraisal is incomplete. This undermines the ability to fully understand and mitigate the development's true impacts, a matter which warrants further detailed consideration before any progression of the proposal.

1.1.758 Personal Observations

In addition to the planning matters above, I am personally concerned because: Me and my family have been going to iona for nearly 40years. It's a tranquil, peaceful remote place which offers a sanctuary for people to escape the rat race of everyday life. If these monstrous wind turbines were to be on the horizon it would just ruin the feel of the place and highly effect marine wildlife.

Finally, I would also ask the Scottish Ministers to consider: Put your wind turbines somewhere else please. Simple as that.

1.1.759 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy requirements governing its determination. Notably, the applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the cultural heritage and communities along this coastal region. Independent reviews of the submitted documentation reveal that the extent of these impacts has been underestimated, and that a comprehensive heritage assessment, as mandated, has not been conducted. Furthermore, while the proposal identifies effects on the island communities involved, it does not provide any formal assessment of these impacts. The ecological criteria necessary for approval have also not been demonstrated as achievable. Compounding these concerns, the application before the Scottish Ministers does not encompass the entirety of the project.

In light of these deficiencies, it is respectfully submitted that the Scottish Ministers should refuse consent for the MachairWind Offshore Wind Farm and decline the accompanying marine licence.

Should the Ministers consider otherwise, it is requested that additional environmental information and enhanced visualisations be sought. Moreover, determination of the applications should be deferred until after a public inquiry, enabling thorough examination of the issues raised within this objection. Irrespective of the final decision, it is also requested that the Ministers explicitly address and reach clear conclusions on the impacts upon cultural heritage and the affected island communities within their formal reasons.

Yours faithfully,

[Redacted]

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

Member of the public 681
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.

1.1.760 Conflict with National Planning Framework 4 and the Development Plan

There remains considerable uncertainty as to whether the proposal complies with the impact criteria set out in NPF4 Policy 11, thereby calling into question the extent of its support for renewable energy development. NPF4 Policy 11 endorses such development only insofar as it meets specific impact tests, including those relating to communities under Policy 11(c), and to landscape, seascape, and other receptors under Policies 11(d) and 11(e). A detailed examination reveals that the proposal would result in significant adverse effects on nationally designated landscapes and seascapes. Furthermore, it has not been sufficiently demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, nor that island communities would be adequately safeguarded. In addition, the evidence submitted fails to confirm that the necessary ecological tests can be met. On this basis, the proposal conflicts with the impact criteria of NPF4 Policy 11 and thus does not benefit from its intended policy support.

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

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

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

The 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.

1.1.761 Seascape, Landscape and Visual Effects

There is considerable uncertainty surrounding the reliability of the applicant's assessment methodology, particularly in relation to the treatment of distance thresholds and their influence on predicted effects. Notably, the applicant's written methodology in Appendix 16.1 does not specify any distance beyond which major effects are considered to cease. However, an independently prepared Evidence Note, based entirely on the applicant's Chapter 16 and Appendices 16.1 to 16.3, reveals a consistent pattern across all three assessment streams: no highly sensitive receptor located beyond approximately 20 kilometres from the development area is attributed the highest magnitude of change, regardless of the receptor's sensitivity or the extent of visibility.

Furthermore, the applicant's own documentation demonstrates that distance plays a significant role in shaping these judgements. For example, the assessment of a coastal area situated over 30 kilometres away concludes that, given the viewing distance, the scale of change is small. Similarly, the Landscape Character synthesis categorises magnitude of change as High within approximately 20 kilometres, Medium between approximately 20 and 30 kilometres, and Low beyond approximately 30 kilometres for certain landscape types. This gradation based on distance appears to systematically moderate the magnitude of effect as distance increases.

The consequence of this approach is that the protective tests are being applied to understated inputs. By moderating magnitude at the very distances where some of

the most sensitive designated landscapes are situated, the conclusions reached fail to provide a reliable representation of the effects the Scottish Ministers are being asked to consent. This fundamental uncertainty in the assessment methodology undermines confidence in the accuracy and robustness of the predicted impacts on sensitive receptors.

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 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.

1.1.762 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 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 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.

1.1.763 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 targeting the guillemot population of the North Colonsay and Western Cliffs Special Protection Area. Such documents are conventionally prepared for scenarios where an adverse effect on the integrity of a protected site cannot be definitively excluded. This submission underscores the applicant’s recognition of potential adverse impacts arising from the proposal. Moreover, the inclusion of these documents is a significant feature of the application itself, indicating that, according to the applicant’s own reasoning, the Scottish Ministers may ultimately reach a different conclusion regarding the presence or absence of adverse effects. While the provision of derogation and compensation plans demonstrates a proactive approach to addressing environmental concerns, it also highlights inherent uncertainties about the proposal’s impact on the protected guillemot population, warranting careful and thorough consideration.

Consent for developments affecting protected habitats and species can only be granted if it is conclusively demonstrated that the proposal will not adversely affect the integrity of the protected site. Under the Habitats Regulations, the competent authority must be satisfied beyond reasonable scientific doubt that the statutory tests are met; otherwise, consent cannot be lawfully issued. This exacting evidential standard places the burden of proof firmly on the applicant. Importantly, reliance on mitigation, compensation measures, or future monitoring alone is insufficient to meet

these tests. This stringent legal framework is reinforced by the requirements set out in the Habitats Regulations, GEN 9 and GEN 13 of the National Marine Plan, as well as Policies 3, 4(b), 4(e), and 4(f) of the National Planning Framework 4. In summary, any proposal must provide robust and definitive evidence of no adverse effect on site integrity before consent can be granted, reflecting the high level of protection afforded to these habitats under current law and policy.

The applicant's 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.

1.1.764 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 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.

1.1.765 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 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 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 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 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 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.

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.

1.1.766 Personal Observations

Based on my own local knowledge, I also wish to highlight that: The west coast of Scotland is an area of significant biodiversity, with relatively untouched landscapes and seascapes home to flora and fauna that must be protected.

Finally, I would also ask the Scottish Ministers to consider: Please preserve Scotland's natural beauty and unique wildlife. Protect our environment for future generations.

1.1.767 Summary

The proposal before the Scottish Ministers fails to satisfy the statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities of the coastal area. Furthermore, analyses of the applicant's documentation reveal that the extent of these impacts has been understated. Crucially, the mandatory heritage assessment has not been completed. While the effects on the island communities affected by the development were identified, no assessment of these impacts has been undertaken. Additionally, the ecological criteria required by relevant legislation have not been demonstrated as achievable. It is also notable that the application submitted represents only a portion of the overall project intended for Scottish Ministers' consideration.

In light of these deficiencies, I respectfully urge the Scottish Ministers to refuse consent for the MachairWind Offshore Wind Farm proposal and to reject the associated marine licence. Should the Ministers consider granting approval, it is requested that they require the submission of further environmental information and enhanced visual representations. Moreover, determination of the applications should only proceed following a public inquiry, enabling a thorough examination of the concerns raised in this objection. Regardless of the decision reached, I ask that the

Ministers provide clear and reasoned conclusions regarding the impacts on cultural heritage and the affected island communities within their final statement.

Yours faithfully,

[Redacted]

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

Member of the public 682
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, which are the subject of application numbers 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. I request that this letter be recorded as an official objection, that my details be registered accordingly, and that I be kept informed of the outcome of these applications.

The project in question seeks approval for an offshore wind installation with a capacity of approximately 2 gigawatts. It would comprise between 91 and 144 turbines, each reaching a maximum height of up to 335 metres to blade tip. The proposed site lies within a designated Windfarm Development Area extending over roughly 448 square kilometres of marine environment, located to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona. This location is in close proximity to the islands and coastal settlements of the southern Hebrides.

The following sections articulate the grounds for objection, grounded in the relevant statutory and policy contexts that govern the determination of such applications. It is important to emphasise that the onus lies firmly with the applicant to demonstrate, through adequate and compelling evidence, that all applicable statutory tests and policy requirements are met. Those opposing the development are not required to prove any contrary position. In this instance, the applicant has failed to satisfy the necessary evidential standards, and for the reasons detailed below, the applications should be refused consent.

1.1.768 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. Authorisation decisions must be made in accordance with the National Marine Plan unless other relevant considerations indicate otherwise. 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 regarding Sound Evidence, and GEN 21 and paragraph 4.85 on Cumulative Impacts. These policies are integral to the statutory assessment process, and the application’s failure to meet their requirements is a fundamental deficiency.

Furthermore, the evidence submitted with the application reveals significant omissions and conflicts with the applicable legal and policy framework. Where compliance with the National Marine Plan policies has not been demonstrated, or where the evidence identifies such deficiencies, these matters must weigh against the granting of consent. The application’s shortcomings in addressing these statutory and policy obligations undermine the legal basis for authorisation and render the proposal unacceptable in its current form. Accordingly, 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 fails to provide an adequate Environmental Impact Assessment (EIA) as mandated by The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations. These regulations explicitly require that the likely significant environmental effects of the proposal be identified, thoroughly assessed, and transparently reported prior to any determination. The absence of a comprehensive and compliant EIA undermines the decision-making process by leaving critical environmental impacts insufficiently examined and documented. This deficiency is not a minor procedural oversight but a fundamental failure to meet statutory requirements designed to safeguard environmental interests.

Furthermore, the proposal does not satisfy the obligations under the Habitats Regulations, which demand a rigorous assessment of the effects on European protected sites in accordance with the applicable statutory tests. The evidence before the determining authority does not demonstrate compliance with these tests, nor does it adequately address potential adverse impacts on designated habitats. This omission represents a clear conflict with the legal framework governing the protection of biodiversity and designated conservation sites. Without a proper Habitats Regulations Assessment (HRA), the proposal cannot be considered lawful or consistent with established environmental protection policies.

Given these significant shortcomings—the incomplete EIA and the failure to conduct a compliant HRA—the proposal is in direct conflict with the statutory and policy requirements set out to ensure environmental protection. Where compliance has not been demonstrated, and where evidence reveals deficiencies and omissions, these matters must weigh decisively against the granting of consent. The application, as it stands, does not meet the necessary legal standards and should therefore be refused on these grounds.

There is significant uncertainty as to whether the proposal has adequately considered and given due weight to the interests of island communities, as mandated by the Islands (Scotland) Act 2018. The statutory requirement is clear that these interests must be integral to the decision-making process. However, the submitted documentation fails to demonstrate compliance with this legal obligation, leaving a critical gap in the assessment of the proposal's impacts on island communities.

This failure to properly address the statutory duty constitutes a material deficiency and omission in the planning process. As established by the Islands (Scotland) Act 2018 and reinforced by relevant policy, where such compliance is not demonstrated, or where evidence reveals conflicts with the applicable legal framework, these shortcomings must weigh decisively against the granting of consent. On this basis, the proposal should be refused planning permission.

1.1.769 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.

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 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 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.

1.1.770 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 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 application fails to comply with essential policy requirements concerning the protection of heritage assets. Specifically, it does not satisfy the provisions set out in National Planning Framework 4 (NPF4), including Policy 7(h) relating to scheduled monuments, Policies 7(c) and 7(d) regarding setting, as well as GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. These policies collectively establish a clear framework for safeguarding the cultural significance of heritage sites.

Moreover, the applicant has not provided the necessary demonstration that the cultural significance of internationally and nationally important heritage assets and their settings will be preserved. Without such evidence, Scottish Ministers lack the assessment required to conclude that the development would not adversely affect these assets. This omission represents a fundamental gap in the application's evidence base.

In conclusion, due to the failure to meet key policy obligations for heritage protection and the absence of a comprehensive assessment, the proposal cannot be

considered acceptable. It is therefore recommended that the application be refused on the grounds of non-compliance with relevant heritage protection policies.

1.1.771 Effects on Island Communities, Tourism and the Local Economy

The proposed development presents a significant threat to the fundamental economic and social sustainability of the island communities affected. These communities rely exceptionally heavily on visitors, who are drawn specifically by the very qualities identified in the applicant's own baselines: landscape, seascape, cultural heritage, tranquillity and remoteness. Any alteration to these attributes would directly undermine the economic foundation upon which these communities depend. Such an impact would extend beyond immediate economic concerns, jeopardising local services, resident populations and the long-term viability of these island communities. It is therefore essential to consider carefully how this proposal could erode the very factors that sustain these unique and vulnerable places.

The 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.

1.1.772 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, with the surrounding waters providing habitat for seabirds, marine mammals, and basking sharks. The proposed project would introduce construction, operational, and decommissioning activities into this ecologically sensitive environment on a very large scale and over several decades. Given the presence of these protected species and habitats, the potential for significant adverse environmental effects is considerable, necessitating careful assessment and mitigation measures to safeguard the ecological integrity of the site and its marine surroundings.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically targeting the guillemot

population within the North Colonsay and Western Cliffs Special Protection Area. Such documents are characteristically prepared in circumstances where an adverse effect on the integrity of the protected site cannot be definitively excluded. The inclusion of these submissions is a notable aspect of the application, as it acknowledges the potential for significant impacts on protected habitats. Importantly, the applicant's approach indicates that Scottish Ministers may ultimately reach a different conclusion regarding the presence or extent of any adverse effects. These documents are therefore intended to address and mitigate potential impacts under derogation provisions, demonstrating the applicant's recognition of ecological sensitivities and the need for compensatory measures.

Mitigation, compensation proposals, and future monitoring, while important 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 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.

1.1.773 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 acknowledges the Sound of Iona as an area of high sensitivity, noting its direct orientation towards the development site, extensive visibility, and a large geographical extent of change. The overall effect is described as moderate and significant over a distance of approximately 21 kilometres, 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 accepts that significant effects would be experienced by residents and visitors across much of the island, including at Dùn Ì, the highest point on Iona.

However, the applicant's evaluation appears to understate the scale and significance of these impacts. Iona's monastic landscape, encompassing internationally important heritage assets such as the Abbey, the Nunnery, and the high crosses, is integral to pilgrimage, arrival by sea, and movement through the landscape—key elements identified 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 raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, a notable omission given the prominence of this vantage point in the heritage context.

Moreover, community consultation reveals a substantial level of opposition, with 92 per cent of Iona households objecting to the proposal. The applicant's own consultants identified habitability as a potential pathway of effect on the community, yet this has not been properly assessed, leaving a gap in the social impact evaluation. To contextualise the visual scale, Ben Hynish on Tiree, a familiar 141-metre landmark visible from Iona at approximately 33 kilometres, would be overtopped by the proposed largest turbines by about 194 metres, despite those turbines being situated at roughly two-thirds of that distance. This comparison underlines the considerable visual dominance and alteration of the landscape that would result.

In summary, while the applicant recognises significant effects on Iona, the evidence suggests these impacts are more extensive and profound than acknowledged, affecting visual amenity, community well-being, and internationally significant

heritage assets. This underestimation compromises the accuracy and completeness of the environmental and social impact assessment for Iona.

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 acknowledges effects on designated landscapes within the Loch na Keal National Scenic Area, including Ulva and Staffa, but underestimates the significance of these impacts. Ulva, a community-owned island undergoing regeneration, relies fundamentally on its unspoilt seascape and setting for recovery; yet no specific assessment has been undertaken to evaluate the effects on this vulnerable community. Staffa, 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 impacts on National Scenic Area qualities. Despite accepting its panoramic maritime qualities, the applicant concludes that the scale of change at Staffa would be small and the effect not significant, a position that discounts the island's acknowledged sensitivity and cultural importance.

Further afield, the applicant assesses the Jura National Scenic Area, situated around 28 to 32 kilometres from the site, as having high sensitivity but attributes only

medium to low magnitude effects. This moderation is justified by distance, apparent scale, and retention of landforms, notwithstanding the fact that the designation fundamentally rests on the wild, undeveloped character of its Atlantic outlook. Similarly, the Scarba, Lunga and Garvellachs National Scenic Area, at approximately 35 to 40 kilometres distance, is afforded the same treatment. Such assessments fail to fully account for the cumulative and landscape-scale impacts on these seaboard designated landscapes 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 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.

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.

1.1.774 Personal Observations

In addition to the planning matters above, I am personally concerned because: Iona is somewhere I visit regularly from Glasgow as a place of deep spirituality. I am a supporter of renewable energy but this is not the place for this wind farm. The site is too important and of significant religious and cultural heritage which includes the overall sense of tranquility and unspoilt seascapes

Based on my own local knowledge, I also wish to highlight that: The Iona experience should be considered in the round. It is not just about a view or potential environmental impacts. The impact is on a globally significant religious site

Finally, I would also ask the Scottish Ministers to consider: Do the right thing - some things need to be valued for their instrunsic spiritual and cultural importance

1.1.775 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 683
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.

1.1.776 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 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), 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 evidence demonstrates that compliance with these policies has not been established. Moreover, deficiencies, omissions, and conflicts with the applicable legal and policy framework have been identified. In accordance with established guidance, such failures weigh decisively against the granting of planning consent. Therefore, the proposal should be refused on the basis that it does not meet the mandatory requirements of NPF4 and associated statutory obligations.

The application fails to comply with the mandatory requirements for environmental impact assessment and habitats regulations assessment, rendering the determination of consent premature and legally unsound. Under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, it is a statutory obligation that the likely significant environmental effects of the proposal be fully identified, assessed, and reported prior to any decision. This procedural prerequisite has not been met, as the submitted documentation lacks comprehensive evaluation of potential environmental impacts, thereby contravening the established legal framework.

Furthermore, the Habitats Regulations impose a clear duty to assess the effects of the proposal on European protected sites in accordance with the applicable statutory tests. The evidence before the determining authority does not demonstrate compliance with these requirements. There are notable deficiencies and omissions in the assessment of impacts on designated habitats, which undermines the integrity of the statutory process and fails to safeguard protected ecological interests.

Given these failures to satisfy the essential statutory tests and the absence of adequate evidence to confirm compliance, the proposal conflicts with the relevant legal and policy framework. Such non-compliance is a material consideration that

weighs decisively against the granting of consent. The application should therefore be refused on the grounds that it does not meet the fundamental environmental assessment and habitats protection obligations mandated by law.

The proposal fails to properly consider and weigh the interests of island communities as mandated by the Islands (Scotland) Act 2018, resulting in a fundamental procedural deficiency. This statutory requirement obliges decision-makers to explicitly address the specific needs and circumstances of island communities during the planning process. The absence of such consideration undermines the integrity of the decision-making framework and contravenes the legal duties established by the Act.

The submitted evidence does not demonstrate compliance with the Islands (Scotland) Act 2018. There are clear deficiencies and omissions in the assessment of how the proposal impacts island communities, and no adequate explanation or justification has been provided to show that their interests have been given due weight. This failure to engage with the statutory requirements constitutes a conflict with the applicable legal and policy framework governing planning decisions affecting island areas.

Given these shortcomings, the proposal cannot be regarded as meeting the necessary legal standards. Where compliance with the Islands (Scotland) Act 2018 is not demonstrated, and where evidence identifies such deficiencies and omissions, these matters must weigh decisively against the granting of planning consent. Accordingly, the application should be refused on the basis that it fails to satisfy the statutory obligations to properly consider and protect the interests of island communities.

There remains significant uncertainty as to whether the applicant has fulfilled the fundamental responsibility to demonstrate compliance with all relevant legal and policy requirements. The evidential burden rests squarely on the applicant to provide robust, objective, and proportionate evidence confirming that every applicable statutory duty, planning policy, and environmental assessment requirement has been satisfied. In this case, the applicant has failed to meet this burden, leaving critical gaps in the evidence base that prevent a clear and confident determination that the proposal accords with the full spectrum of legal and policy obligations.

Moreover, where compliance has not been demonstrated, or where the submitted evidence reveals deficiencies, omissions, or conflicts with the applicable legal and policy framework, these shortcomings must weigh decisively against the granting of consent. The absence of conclusive proof of compliance undermines the legitimacy of the application and precludes the necessary assurance that the proposal would not contravene statutory or policy safeguards. On this basis, the application should be refused.

1.1.777 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.

Policy 11 must be considered alongside Policy 4(c) and 4(d), which safeguard National Scenic Areas and nationally important landscapes by preventing significant adverse effects on the qualities for which these areas are designated. Additionally, Policy 7, including section 7(h) concerning scheduled monuments and sections 7(c) and 7(d) relating to the settings of historic assets, as well as Policy 3 on biodiversity, provide a comprehensive framework for the protection of designated assets. The proposal, however, fails to align with these policies.

Specifically, the proposal would result in significant adverse effects on nationally designated landscapes and seascapes, undermining their recognised qualities. It has not been adequately demonstrated that the cultural significance of scheduled monuments and their surrounding settings would be preserved, nor that the interests of island communities would be safeguarded. Furthermore, the ecological tests mandated by Policy 3 have not been shown to be met based on the evidence submitted. Consequently, the proposal conflicts with the relevant NPF4 policies protecting nationally important landscapes, heritage assets, and biodiversity.

The proposal is found to be in clear conflict 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, thereby undermining key objectives of the local development strategy. Such detrimental impacts directly contravene the specific provisions intended to safeguard the character and well-being of the area.

Furthermore, this inconsistency extends beyond the local level. When considered in the context of the National Planning Framework 4 as a whole, the proposal similarly fails to align with the broader strategic aims set out to guide sustainable and sensitive development. The applicant has not provided evidence or argumentation sufficient to demonstrate compliance or to mitigate the identified conflicts with either the local or national policy frameworks.

In conclusion, the adverse effects on landscape, heritage, and community interests, coupled with the absence of adequate justification or mitigation, mean that the proposal cannot be supported as being consistent with the statutory development plan. Accordingly, it should be refused planning permission on the grounds of conflict with both the Argyll and Bute Local Development Plan 2 and the overarching National Planning Framework 4.

1.1.778 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 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 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 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.

1.1.779 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 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 applicant's evidence acknowledges that the heritage conclusions presented in the proposal are fundamentally reliant upon the findings of the accompanying landscape assessment. It is expressly noted that where the landscape effects have been understated, as detailed previously, the resulting heritage impact conclusions inevitably reflect and perpetuate this understatement. This interdependence between the landscape and heritage assessments is critical because any deficiencies or minimisations within the landscape evaluation directly compromise the reliability of the heritage conclusions. Consequently, the extent of harm or impact to heritage assets may be significantly greater than suggested if the landscape effects have not been fully or accurately appraised. In light of this, the credibility of the heritage impact assessment is undermined, and caution should be exercised in accepting these conclusions without further independent verification.

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.

1.1.780 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 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 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.

1.1.781 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 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 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.

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 establish with sufficient certainty that these legal requirements can be met. This lack of demonstrable compliance undermines confidence in the application's ecological safeguards.

Given this insufficiency of evidence, it is clear that the application does not meet the necessary legal standards intended to prevent harm to internationally protected ecological features. On this basis, the case for granting consent is fundamentally weakened and cannot be supported.

1.1.782 Cumulative and In-Combination Effects

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

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

The practical consequence of relying on the current cumulative impact assessment is that it significantly underestimates the true combined effects of the proposed development alongside existing, consented, and foreseeable projects. This stems directly from the reliance on baseline assessments within the Environmental Impact

Assessment that have themselves understated landscape, heritage, and socio-economic effects. As a result, the starting point for the cumulative assessment is flawed, leading to an overall diminished understanding of the proposal's broader implications.

Analytically, because the cumulative assessment depends entirely on these baseline conclusions, any inaccuracies or omissions in the initial evaluations inevitably carry through into the combined effects appraisal. Consequently, the assessment fails to capture the full scale and severity of cumulative impacts, reducing its reliability as a tool for informed decision-making. Without addressing these foundational understatements, the cumulative assessment cannot be regarded as a robust or comprehensive reflection of the development's true potential consequences.

The applicant's submission fails to demonstrate compliance with GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the Environmental Impact Assessment Regulations regarding project splitting. Specifically, the cumulative and in-combination effects of the proposal, as well as the impacts of the project in its entirety, have not been reliably identified or assessed. This omission raises significant concerns about the adequacy of the environmental appraisal and undermines the robustness of the decision-making process. Consequently, it is essential that the determination explicitly addresses the treatment of any deferred works to ensure full consideration of all potential effects, in accordance with the relevant policy and regulatory requirements.

1.1.783 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.

1.1.784 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 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 significant effects on several key locations around Mull and the Ross of Mull, such as Erraid, the Core Paths of the Ross, and Fionnphort, recognising these as areas of high sensitivity and accepting medium magnitude impacts over distances of approximately 21 to 33 kilometres. However, the proposed mitigation measures appear insufficient when compared to the scale of these acknowledged effects, particularly given the economic and community reliance on these areas. For instance, Fionnphort, as the principal gateway to Iona and the primary embarkation point for visitors, is directly linked to the flow of tourism that underpins the local economy. Despite this, there is no detailed, place-based assessment addressing the specific consequences for communities so closely tied to visitor experience.

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

While the applicant's assessment acknowledges some effects on designated landscapes, 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 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 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 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.

1.1.785 Personal Observations

Finally, I would also ask the Scottish Ministers to consider: There is NOTHING environmentally friendly about this proposal. This is as harmful to Mother Earth and all our relations as oil drilling.

1.1.786 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 684
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.

1.1.787 Conflict with National Planning Framework 4 and the Development Plan

The proposal fails to meet the impact criteria outlined in NPF4 Policy 11, which explicitly supports renewable energy development only insofar as it complies with specified protections. Notably, Policy 11(c) requires safeguarding communities from adverse effects, while Policies 11(d) and 11(e) impose strict controls to prevent unacceptable impacts on landscape, seascape, and other sensitive receptors. The evidence demonstrates that the proposal would cause significant adverse effects on nationally designated landscapes and seascapes, thereby breaching these critical provisions.

Furthermore, the submission does not satisfactorily address the protection of cultural heritage or community interests. The cultural significance of scheduled monuments and their settings remains unprotected, and the proposal fails to provide sufficient assurance that island communities would be safeguarded from detrimental impacts. In addition, the ecological assessments fall short of demonstrating that the necessary environmental tests can be met. Taken together, these shortcomings establish clear conflicts with the impact criteria of NPF4 Policy 11, undermining the policy’s conditional support for the development in question.

The proposal fails to comply with multiple policies within the National Planning Framework 4 (NPF4) that collectively safeguard nationally important landscapes, heritage assets, and biodiversity. Policy 11 operates in conjunction with Policy 4(c) and 4(d), which specifically protect National Scenic Areas and nationally important

landscapes from significant adverse effects on the characteristics for which they are designated. Additionally, Policy 7 addresses the protection of scheduled monuments and the settings of historic assets, with particular reference to Policies 7(h), 7(c), and 7(d). Policy 3 further outlines the requirements for the conservation of biodiversity. Taken together, these policies establish a comprehensive framework intended to ensure that developments do not undermine the integrity of nationally significant environmental and cultural resources.

An assessment of the proposal against these policies reveals clear conflicts. It would result in significant adverse effects on nationally designated landscapes and seascapes, contrary to the protections afforded by Policies 4(c) and 4(d). Furthermore, the submission has not demonstrated that the cultural significance of scheduled monuments and their settings would be preserved, thus failing to satisfy the requirements of Policy 7. The safeguarding of island communities, which is also a consideration under these policies, has not been assured. Finally, the ecological tests required under Policy 3 have not been evidenced as being capable of compliance based on the material submitted. Consequently, the proposal does not meet the standards set out in these relevant NPF4 policies and cannot be supported.

1.1.788 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.

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 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.

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

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

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

The heritage impact conclusions presented 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 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.

1.1.790 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.

There remains significant uncertainty regarding the adequacy of the socio-economic assessment in understanding the impacts on island communities. Notably, the applicant's own consultants identified habitability as a potentially significant pathway

for effects on these communities, yet no specific assessment of the habitability of the affected islands was undertaken. Instead, the assessment in Chapter 18 focuses on regional-level analysis, giving detailed consideration to port communities but failing to provide an equivalent place-based evaluation for the island communities directly facing the development. Despite this omission, the assessment nonetheless concludes that these island communities are of low sensitivity to tourism effects. This conclusion is fundamentally flawed, as small island economies cannot be represented as regional averages; their economic reliance is concentrated in sectors highly vulnerable to changes in the qualities that attract visitors. Far from reducing sensitivity, dependence on increasing visitor numbers exacerbates vulnerability to impacts on these qualities. Therefore, the assertion of low sensitivity, reached without any place-based analysis, lacks evidential support and must be regarded as an unfounded assumption. In closing, this critical gap undermines confidence in the applicant's methodology and its ability to understand or mitigate the socio-economic impacts on island communities.

1.1.791 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'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.

1.1.792 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 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.

1.1.793 Public Engagement, Site Selection and Environmental Information

The Environmental Impact Assessment submitted fails to provide sufficient information to enable the Scottish Ministers to reach a fully informed decision.

Although it is comprehensive in scope, the assessment falls short in addressing key potential significant effects with adequate rigour. For instance, the landscape assessment relies on a distance-based pattern that is not supported by its own methodology, while the heritage assessment lacks clear evidence of applying its stated integrity test. Additionally, the socio-economic assessment omits a focused place-based analysis of the affected islands, undermining its relevance. Crucially, the application defers consideration of certain impacts to future post-consent plans, monitoring, and additional approvals, yet the EIA Regulations require that likely significant effects be clearly understood prior to determination. It is therefore imperative that decisions are made on the basis of the evidence presently before the Scottish Ministers, not on assumptions that outstanding issues will be satisfactorily resolved later. The applicant has not demonstrated that the environmental information provided meets this essential standard.

1.1.794 Effects on Local Area

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

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

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

The practical consequence of the applicant's assessment is a significant 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.

1.1.795 Personal Observations

In addition to the planning matters above, I am personally concerned because: I have visited Iona for years with family it is a unique and special place with both historical and cultural significance. The size and scale of the proposed wind site is completely incongruous with this . I am also concerned regarding the plentiful and abundant wildlife living here. This is not in my opinion the place for such a development such special, tranquil, spiritual and beautiful places should be protected

I have also spent time in Islay and Colonsay

Based on my own local knowledge, I also wish to highlight that: Wildlife and migratory routes both birds and aquatic creatures
The views from these special and beautiful places visited exactly because of this will be adversely affected.
The community don't want it have not bought into it that was very apparent when I visited last month.

Finally, I would also ask the Scottish Ministers to consider: I like them to seriously consider why such a site would be considered for this area and why it is potentially for the benefit of a Spanish firm

1.1.796 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 685
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.

1.1.797 Legislative and Policy Framework

The proposal 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 development be fully identified, assessed, and reported prior to any decision. This 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 statutory tests. The evidence before the authority does not demonstrate compliance with these requirements. The absence of a comprehensive and lawful assessment constitutes a fundamental deficiency and omission in the application.

Given these failures, the proposal conflicts with the applicable legal and policy framework. Such non-compliance weighs decisively against the granting of consent. In the absence of adequate EIA and HRA documentation, 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 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.

1.1.798 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.

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'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.

1.1.799 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 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.

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.

1.1.800 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.

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 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.

1.1.801 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 constitutes a critical element in the assessment of potential adverse impacts on the North Colonsay and Western Cliffs Special Protection Area. These documents acknowledge the possibility that the proposed development may affect the integrity of this protected site, specifically

targeting the guillemot population, and are indicative of the applicant's recognition that such impacts cannot be definitively excluded at this stage. By preparing these documents, the applicant is addressing the requirements set out under derogation provisions, which are invoked when adverse effects on a protected site are uncertain but cannot be ruled out. It is important to note that, as per the applicant's own position, the Scottish Ministers retain the discretion to reach a different conclusion regarding the presence or absence of adverse effects on site integrity. Therefore, the submission of these derogation and compensation documents is both a procedural necessity and a substantive acknowledgment of potential environmental risks associated with the proposal. This measure should be seen as an integral part of the application, reflecting a responsible approach to managing possible impacts on protected ecological interests.

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.

1.1.802 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 relies fundamentally on the findings presented in the broader Environmental Impact Assessment. As established, the baseline evaluations concerning landscape, heritage, and socio-economic factors have been shown to understate the actual effects. Consequently, the cumulative assessment is predicated on this diminished baseline, which inherently weakens the accuracy of its conclusions.

Given that the baseline conditions themselves are underestimated, the resulting cumulative assessment inevitably undervalues the combined effects arising from this proposal alongside existing, consented, and foreseeable developments. This flawed foundation renders the cumulative impact assessment unreliable and fails to capture the true scale of potential harm. Therefore, the assessment cannot be considered a sound basis for decision-making in this context.

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.

1.1.803 Public Engagement, Site Selection and Environmental Information

There remains significant uncertainty regarding the adequacy of public participation in the site-selection and application stages of this proposal. The applicant places considerable weight on the site-selection process, making the quality of engagement during that stage directly relevant to the legitimacy of their case. However, the deficiencies observed in public involvement at earlier stages have persisted into the

current application, which comprises an extensive volume of technical documentation.

The timing of the consultation period exacerbates these concerns. It has coincided with the busiest months for island communities, when residents are heavily engaged in continuous work throughout the visitor season, and access to specialist advice is limited. In contrast, the applicant has had years to prepare their submission, supported by substantial professional and financial resources. This imbalance raises questions about whether affected communities have been afforded a realistic and meaningful opportunity to participate in decisions of such significance.

National policy and international principles provide clear guidance on public participation. GEN 18 of the National Marine Plan, together with the Aarhus Convention's emphasis on effective involvement, require that those impacted by proposals have a genuine chance to influence outcomes. The conditions under which local communities have been expected to respond fall short of these standards. It is therefore essential that Ministers carefully weigh these participation concerns when considering the representations put forward.

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.

1.1.804 Effects on Local Area

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

Similarly, for Colonsay and Oronsay, the seaward outlook, integral to daily life, directly faces the development array. The North Colonsay and Western Cliffs Special Protection Area, situated on Colonsay's coastline, is central to the applicant's derogation case and compensation plan, acknowledging that harm to the

internationally protected seabird population cannot be ruled out. Additionally, Oronsay Priory, a scheduled monument of national importance within this community, suffers from the same inadequacies in heritage assessment, particularly concerning its open maritime setting. These shortcomings collectively undermine the reliability of the environmental and heritage impact evaluation presented.

The practical consequence of the applicant's assessment is 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.

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 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 practical consequence of the applicant's assessment is a significant understatement of the visual and landscape effects on Tiree, which risks resulting in an unreliable evaluation of the project's true impact. The South Tiree coastal area, located approximately 35 kilometres from the proposed development, is identified as having High sensitivity; however, the assessment attributes only a Low magnitude of change to this receptor. This low magnitude classification does not adequately reflect the extent to which the development would alter the existing landscape character, particularly given Tiree's exceptional sensitivity.

Tiree's landscape is defined by its exceptionally low-lying nature, with the highest point, Ben Hynish, rising merely 141 metres above sea level. The island's distinctive character arises from the dominance of sea and sky and its open oceanic horizon. Introducing turbines up to 335 metres in height would place vertical structures into the seascape that have no precedent on the island. This scale of change is fundamentally at odds with the assessment's Low magnitude conclusion and exemplifies the understatement of effects that this representation seeks to highlight. Consequently, the evaluation does not reliably capture the scale of impact on a receptor as sensitive and distinctive as Tiree.

While the applicant's assessment applies distance-based mitigation measures to 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 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.

1.1.805 Personal Observations

In addition to the planning matters above, I am personally concerned because: I believe the proposal ruins one of the world's most beautiful and valuable groups of islands, visually, as a habitat for important wildlife and as home for the residents. It isn't necessary when Scotland already produces more clean energy than it uses while paying more than the rest of the U.K.
I believe the island communities should have the final say on this development.

1.1.806 Summary

The proposal before the Scottish Ministers fails to demonstrate compliance with the relevant statutory and policy framework governing its determination. The applicant's own evaluation acknowledges substantial impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal region. However, published analyses of the applicant's documentation reveal that the magnitude of these impacts has been underestimated, and crucially, the necessary heritage assessment has not been conducted. Moreover, while the effects on the island communities impacted by the development were identified, no assessment of these effects has been undertaken. The ecological requirements associated with the project remain unproven as capable of being met. It is also pertinent to note that only a portion of the entire project is currently submitted for consideration by the Scottish Ministers.

In light of these significant shortcomings, it is respectfully submitted that both consent for the MachairWind Offshore Wind Farm and the corresponding marine licence should be refused. Should the Scottish Ministers contemplate granting approval, it is requested that they first require the submission of additional environmental information and enhanced visualisations to clarify the full extent of impacts. Furthermore, any determination should be deferred until after a public inquiry, thereby ensuring that the concerns raised in this objection are thoroughly examined in an open and transparent forum. Regardless of the final decision, it is further requested that the Ministers explicitly address and provide reasoned conclusions regarding the effects on cultural heritage and the island communities affected by the proposal.

Yours faithfully,

[Redacted]

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

Member of the public 686
Dear Sir/Madam,

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

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

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

1.1.807 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 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 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.

1.1.808 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.

1.1.809 Cumulative and In-Combination Effects

The assessment of the current project is fundamentally flawed because it considers only a portion of the development before the Scottish Ministers, with significant components such as the export cable corridor and the onshore transmission works deferred to future applications. These elements are essential for the wind farm’s operation, yet their effects are excluded from the present evaluation. Consequently, the project’s impacts are never assessed in their entirety, but rather fragmented across separate consenting processes that follow the principal decision. This piecemeal approach contravenes established legal principles, as affirmed by the courts in Raeshaw Farms, which require that a project must be assessed comprehensively rather than being artificially divided into smaller parts whose individual effects might appear less significant. Therefore, the current assessment does not satisfy the necessary procedural and legal standards for a holistic evaluation of the project’s impacts.

The 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.

1.1.810 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.

1.1.811 Summary

The proposal for the MachairWind Offshore Wind Farm fails to meet the necessary statutory and policy requirements guiding its determination. The applicant's own evaluation acknowledges substantial impacts on nationally designated landscapes, as well as on the cultural heritage and communities along this coastline. Furthermore, published reviews of the applicant's documentation reveal a systematic understatement of the magnitude of these effects. Crucially, the mandatory heritage assessment has not been conducted, and the consequences for the island communities affected have been identified but remain unassessed. In addition, the ecological criteria essential for approval have not been demonstrated as achievable. It is also important to note that only a portion of the project is currently before the Scottish Ministers for consideration.

In light of these significant shortcomings, I respectfully urge the Scottish Ministers to refuse consent for this Offshore Wind Farm proposal and to reject the related marine licence application.

Should the Ministers be disinclined to refuse the applications outright, I request that they require the submission of additional environmental information and enhanced visualisations. Moreover, I propose that the determination of these applications be deferred until a public inquiry is held, allowing for a thorough examination of the issues raised within this objection. Regardless of the final decision, I further ask that

the Ministers provide explicit conclusions within their stated reasons concerning the impacts on both cultural heritage and the affected island communities.

Yours faithfully,

[Redacted]

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

Member of the public 687
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.

1.1.812 Personal Observations

In addition to the planning matters above, I am personally concerned because: .

Finally, I would also ask the Scottish Ministers to consider: B

1.1.813 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 688
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.

1.1.814 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 under consideration fails to demonstrate compliance with the statutory requirements set out in Part 4 of the Marine (Scotland) Act 2010 and the relevant policies of Scotland's National Marine Plan. The application does not adequately address the General Policies critical to the assessment, including GEN 4 on Co-existence, GEN 6 and paragraphs 4.22 to 4.23 concerning the Historic Environment, GEN 7 and paragraph 4.28 relating to Landscape and National Scenic Areas, GEN 9 on Natural Heritage, GEN 13, GEN 18 on Engagement, GEN 19 and paragraph 4.81 on Sound Evidence, and GEN 21 and paragraph 4.85 on Cumulative Impacts. The absence of clear evidence demonstrating conformity with these policies constitutes a fundamental deficiency in the application's statutory assessment. Without such demonstration, the application cannot be considered to have met the legal threshold required for authorisation under the Marine (Scotland) Act 2010.

Furthermore, the evidence submitted reveals significant omissions and conflicts with the applicable legal and policy framework. The failure to provide sound evidence as required by GEN 19 undermines the credibility and reliability of the environmental and heritage assessments. The lack of adequate engagement as mandated by GEN 18 further compromises the procedural integrity of the application. Additionally, the application does not satisfactorily address cumulative impacts as required by GEN 21, nor does it ensure the protection of the historic environment, landscape, and natural heritage in accordance with the relevant policies. These shortcomings are not minor procedural errors but substantive failures that weigh decisively against the granting of consent. In light of these unresolved deficiencies and the absence of compliance with the National Marine Plan policies, the marine licence application should be refused.

The proposal fails to demonstrate compliance with the key policies of National Planning Framework 4 (NPF4) relevant to biodiversity, natural places, historic assets, and energy, specifically Policies 3, 4, 7, and 11. NPF4 is a significant material consideration that must be applied alongside the relevant statutory duties and legislative requirements. The submitted evidence does not establish that the proposal meets the requirements of these policies, and there are clear deficiencies and omissions in the application's assessment of impacts on biodiversity and natural places. The absence of adequate evidence to confirm that the proposal will protect or enhance biodiversity and natural environments directly conflicts with Policy 3 and Policy 4. Similarly, the proposal fails to sufficiently address the protection of historic assets and places as required by Policy 7, with no convincing demonstration that the historic environment will be preserved or appropriately managed. Furthermore, the application does not provide adequate information to show compliance with Policy 11

on energy, leaving uncertainty as to whether the proposal aligns with the energy objectives set out in NPF4.

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. The failure to meet the explicit requirements of NPF4 and the lack of satisfactory evidence to address the statutory and policy obligations represent fundamental shortcomings in the proposal. Given the statutory status of NPF4 and its policies as material considerations, the unresolved conflicts and evidential gaps must result in refusal. The proposal's inability to comply with the comprehensive framework designed to safeguard biodiversity, natural places, historic assets, and energy objectives is a decisive planning objection that cannot be overcome on the basis of the submitted evidence.

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 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 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.

1.1.815 Conflict with National Planning Framework 4 and the Development Plan

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.

1.1.816 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.

1.1.817 Cultural Landscape, Archaeology and 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.

1.1.818 Effects on Island Communities, Tourism and the Local Economy

While mitigation measures may seek to address certain impacts, they fall short in safeguarding the essential qualities that underpin the economic and social fabric of the island communities affected by this proposal. These communities depend to an exceptional degree on visitors, who are drawn specifically by the attributes identified in the applicant's own baseline assessments: landscape, seascape, cultural heritage, tranquillity and remoteness. Any alterations to these defining characteristics strike directly at the economic base of these communities. Such a disruption threatens not only local services and population stability but also the long-term viability of these island communities themselves. Consequently, the proposal poses a fundamental risk to their economic and social sustainability.

1.1.819 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.

1.1.820 Effects on Local Area

The applicant's own Coastal Character assessment acknowledges the Sound of Iona as an area of high sensitivity, directly oriented towards the proposed development, with extensive visibility and a large geographical extent of change. The assessment identifies a Moderate and Significant overall effect at approximately 21 kilometres, with turbines spanning roughly 39 degrees of the horizon. Similarly, the West Coast of Iona is recognised as highly sensitive with widespread visibility, and the applicant concedes significant effects on residents and visitors across much of the island, including at Dùn Ì, Iona's highest point.

Iona's monastic landscape, encompassing the Abbey, the Nunnery, and the high crosses, is of international heritage importance. The applicant's baseline identifies pilgrimage, sea arrival, and movement through the landscape as central to this significance. Historic Environment Scotland requested additional viewpoints, notably from the ferry crossing itself; however, no visualisation has been provided from the elevated ground above St Columba's Bay at Càrn Cùl ri Èirinn, a notable omission given the cultural context.

A household consultation on Iona revealed that 92 per cent of respondents object to the proposal, yet the applicant's own consultants identified habitability as a potential pathway of effect on this community—a factor that remains unassessed. To further contextualise the scale of the impact, the turbines would exceed the height of Ben Hynish on Tiree (141 metres high and visible from Iona at approximately 33 kilometres) by about 194 metres, despite being situated roughly two-thirds of that distance away.

Taken together, these points demonstrate that the applicant's assessment underestimates the scale and significance of visual, community, and heritage impacts on Iona, thereby compromising the accuracy of the environmental and social impact evaluation.

The applicant's assessment of the 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 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.

1.1.821 Personal Observations

In addition to the planning matters above, I am personally concerned because: Having visited Iona and Staffa I am very concerned about possible negative impacts of this project on these areas.

1.1.822 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 coastal communities and their heritage. However, independent scrutiny of the applicant's documentation reveals that these effects have been understated, and that an essential heritage assessment has not been conducted. Furthermore, while the detrimental impacts on the island communities have been identified, no formal assessment of these effects has taken place. Additionally, the ecological tests mandated by policy remain unproven as achievable. It is also notable that the application before the Scottish Ministers represents only a portion of the entire project.

Given these substantial 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 approval, it is requested that they require the submission of further environmental information alongside enhanced visualisations. Moreover, determination of the applications should 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 requested that the Ministers provide explicit conclusions within their decision, 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 689
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.

1.1.823 Seascape, Landscape and Visual Effects

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

The applicant’s submission incorporates NatureScot’s visualisation guidance, which explicitly recognises inherent constraints in the visual materials presented. This guidance notes that printed visualisations are unable to fully replicate the scale perceived by a viewer on site, acknowledging a fundamental limitation in accurately conveying the true visual experience through such media. Furthermore, the wireline

drawings included within the panoramic projections share these limitations as they are intrinsically linked to the photographic content they accompany.

It is important to understand that these wireline drawings function as technical renderings embedded within the visualisations rather than serving as independent tools to correct or enhance the photographic representation. Consequently, their value is confined by the same perceptual and technical restrictions as the photographs, limiting their ability to provide an entirely objective or comprehensive view of the proposed development's visual impact.

Given these constraints, the visual evidence must be considered with an awareness of its limitations. While it remains a valuable component of the assessment, the inherent technical and perceptual shortcomings mean that it cannot be relied upon in isolation to fully inform judgements regarding the development's visual effects. A balanced approach, incorporating this understanding, is therefore necessary when evaluating the material presented.

The proposed development would introduce aviation and navigation lighting to a sea horizon that is currently 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.

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.

1.1.824 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment of heritage impacts fails to comply with the required methodology, thereby undermining the reliability of its conclusions regarding the integrity of setting. Although the applicant adopts Historic Environment Scotland's recognised methodology, which mandates an evaluation of whether changes to setting affect the contribution setting makes to cultural significance and whether the integrity of setting is maintained, this crucial evaluative step is absent. Instead, the

assessment focuses on describing visual change—considering factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—but does not demonstrate how these observations translate into an assessment of setting integrity as required. A Methodological Audit, based solely on the applicant's Appendix 14.3, confirms that while heritage attributes are identified, the assessment does not evidence the necessary evaluative process, casting doubt on its conclusion that the integrity of setting is adequately retained.

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

The heritage impact assessment relies heavily on the findings of the landscape assessment, which serves as a foundational element in determining the extent of heritage effects. However, as established, the landscape assessment has systematically understated the magnitude of landscape effects. This understatement inevitably permeates the heritage conclusions, resulting in an overall minimisation of the potential heritage impacts. Consequently, the credibility of the heritage impact conclusions is compromised by their dependence on an assessment that does not fully capture the true extent of landscape effects. It follows that any mitigation measures proposed, based on these heritage conclusions, may be insufficient to address the actual level of harm. Therefore, the reliance on the current landscape assessment undermines the robustness of the heritage impact evaluation, warranting a more thorough and accurate assessment to inform appropriate mitigation strategies.

The application fails to provide adequate mitigation measures to ensure the protection of internationally and nationally important heritage assets, as required under the relevant planning policies. Notably, it does not comply with the provisions of NPF4 Policy 7, specifically subparagraphs (h) relating to scheduled monuments and (c) and (d) concerning their settings, alongside GEN 6 and the guidance contained within paragraphs 4.22 to 4.23 of the National Marine Plan. These policies collectively establish a clear framework for safeguarding cultural heritage, requiring a thorough assessment and demonstration that the significance of such assets and their settings will be preserved.

Moreover, the applicant has not furnished the necessary evidence to confirm that the cultural significance of the heritage assets will be maintained. The Scottish Ministers, therefore, lack the comprehensive assessment required to form a conclusion on this matter. In the absence of such a critical evaluation, the proposal cannot be deemed compliant with the statutory policy framework intended to protect heritage assets.

Consequently, the application as it stands undermines the acceptability of the development from a heritage protection standpoint.

1.1.825 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 own consultants acknowledged that habitability represents a potentially significant pathway through which the proposed development could impact island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic assessment presented in Chapter 18 addresses impacts primarily at a regional scale, focusing in detail on potential port communities but failing to provide an equivalent place-based evaluation of the island communities directly facing the development. Notwithstanding this lack of targeted analysis, the assessment nonetheless concludes that those island communities exhibit low sensitivity to tourism effects.

This approach overlooks critical distinctions between small island economies and broader regional averages. Small island economies are concentrated in sectors that are particularly vulnerable to alterations in the qualities that attract visitors. Far from mitigating sensitivity, a reliance on increasing visitor numbers actually intensifies dependence on these at-risk qualities. Therefore, the conclusion of low sensitivity drawn without a place-based analysis cannot be regarded as evidence but must be seen as an unsubstantiated assumption.

Given these significant methodological shortcomings, the socio-economic assessment does not provide a reliable understanding of the potential impacts on island communities. A more nuanced, place-specific evaluation is necessary to accurately assess and mitigate the effects of the proposed development on these sensitive economies. Without this, the assessment falls short of informing appropriate planning decisions regarding the proposal's effects on island communities.

The proposal fails to 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.

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

Mitigation, compensation proposals, and future monitoring, 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 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.

1.1.827 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 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.

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.

1.1.828 Public Engagement, Site Selection and Environmental Information

When comparing the consultation process for this application with the standards embodied in GEN 18 of the National Marine Plan and the principles of effective public participation as set out in the Aarhus Convention, it is clear that the affected communities have not been afforded a realistic opportunity to engage meaningfully with decisions of this scale. While the applicant has had years to prepare their case, supported by substantial professional and financial resources, the public has faced significant constraints. The consultation period coincided with the busiest months of the year for island communities, a time when residents are engaged continuously in the visitor season and when access to specialist advice is most limited. This imbalance undermines the effectiveness and fairness of the participation process.

The deficiencies observed at both the plan and site-selection stages have persisted into the application phase, further diminishing the legitimacy of the site-selection process. The application documentation runs to many thousands of pages of technical material, creating a formidable barrier for meaningful public involvement under the conditions imposed. Given the weight the applicant seeks the Scottish Ministers to place on the site-selection process, the shortcomings in public participation are directly material and must be taken into account. It is imperative that Ministers bear these factors firmly in mind when considering the representations made, as the integrity of the decision-making process depends on adherence to established standards of consultation and public engagement.

The 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.

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

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

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

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

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

The 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.

1.1.830 Personal Observations

In addition to the planning matters above, I am personally concerned because: As a resident of East coast Scotland, I regard the Western Isles as an unspoiled paradise and feel that my enjoyment of holidays there would be spoiled by this development. It would make me less likely to visit for holidays.

1.1.831 Further Comments

As a sea kayaker, one of the best trips I have undertaken was to Ulva and the Treshnish Islands. The experience of camping on Lunga, with pristine wild views across the sea, is one I shall treasure. This would definitely have been spoiled by a massive array of turbines on the horizon.

1.1.832 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 690
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, corresponding to application 00012385 for consent pursuant to section 36 of the Electricity Act 1989, alongside application 00012386 for a marine licence under Part 4 of the Marine (Scotland) Act 2010. These applications, submitted by MachairWind Limited (ScottishPower Renewables), seek approval for a substantial offshore wind energy development.

The proposed project entails the installation of an offshore wind farm with an anticipated generating capacity of approximately 2 gigawatts. It comprises between 91 and 144 turbines, each reaching up to 335 metres to blade tip, situated within an extensive Windfarm Development Area covering about 448 square kilometres. This area lies to the north-west of Islay and west of Colonsay, approximately 21 kilometres from Iona, and in proximity to the islands and coastal communities of the southern Hebrides.

My objection is grounded on planning and environmental considerations addressed within the statutory and policy frameworks governing the determination of these applications. It is important to emphasise that the responsibility to satisfy the relevant legal and policy tests rests entirely with the applicant, who must provide sufficient evidence to demonstrate compliance. Objectors are not obligated to prove the contrary. In this instance, the applicant has failed to meet this evidential burden, and accordingly, I contend that consent for the development should be withheld.

I request that this communication be formally recognised as an objection, that my status as an objector be recorded, and that I be kept informed of the final decision regarding these applications.

1.1.833 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.

1.1.834 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.

1.1.835 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.

1.1.836 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.

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.

1.1.837 Public Engagement, Site Selection and Environmental Information

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.

1.1.838 Effects on Local Area

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 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.

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.

1.1.839 Personal Observations

In addition to the planning matters above, I am personally concerned because: Family has lived in the Ross of Mull for nearly 100 years, this proposal would not be good for the local community and tourists visiting the area.

Based on my own local knowledge, I also wish to highlight that: N/a

Finally, I would also ask the Scottish Ministers to consider: The natural & historic landscape of the area and how it would be impacted

1.1.840 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 691
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.

1.1.841 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.

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 currently unlit sea horizon, thereby permanently altering the character of the night-time seascape over its 35-year operational life. This change is not merely a temporal inconvenience; it represents a lasting transformation of the seascape's intrinsic qualities. Furthermore, the policy implications of consenting to such development extend beyond the finite operational period. Granting permission would signify a formal recognition that this particular seascape is appropriate for wind farm use, thereby setting a precedent with potentially enduring consequences for the character and perception of the area at night. In summary, the introduction of lighting effects would cause a substantive and lasting impact on the night-time seascape, and the decision to approve would carry significant policy weight regarding the future use and character of this seascape.

The 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.

1.1.842 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.

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

In essence, the credibility of the heritage assessment is compromised by the deficiencies in the landscape evaluation. Without an accurate and comprehensive appraisal of landscape effects, the heritage conclusions derived are not sufficiently reliable to inform decision-making. Therefore, the current heritage impact

conclusions should be treated with caution given their reliance on a flawed landscape assessment.

The application 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.

1.1.843 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 mitigating impacts on island communities, particularly when compared to the detailed place-based analysis applied to regional port communities. While the assessment in Chapter 18 thoroughly examines potential port communities, it neglects to conduct

any equivalent analysis of the affected islands, despite the applicant's own consultants identifying habitability as a potentially significant pathway for impact. Instead, the assessment proceeds at a regional level and concludes, without specific evidence, that island communities have low sensitivity to tourism effects.

This approach is fundamentally flawed. Small island economies are not simply regional averages; rather, they are characterised by concentrated economic activities in sectors highly vulnerable to changes in the qualities that attract visitors. Far from reducing sensitivity, reliance on increasing visitor numbers exacerbates dependence on those qualities and heightens vulnerability. Concluding low sensitivity without place-based analysis is therefore not supported by evidence but rests solely on an unsupported assumption. Consequently, the socio-economic assessment methodology is insufficient to understand or appropriately mitigate the impacts on island communities.

The proposal fails to 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.

1.1.844 Ecology, Biodiversity and Habitats Regulations

The development area encompasses Priority Marine Features and Annex I habitats, with the surrounding waters providing habitat for seabirds, marine mammals, and basking sharks. The proposed project would introduce construction, operational, and decommissioning activities into this ecologically sensitive environment on a very large scale and over several decades. Given the presence of these protected species and habitats, the potential for significant adverse environmental effects is considerable, necessitating careful assessment and mitigation measures to safeguard the ecological integrity of the site and its marine surroundings.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically addressing the guillemot population at the North Colonsay and Western Cliffs Special Protection Area. Such documents are typically prepared in circumstances where an adverse effect on the integrity of a protected site cannot be definitively ruled out. Their inclusion in this application highlights the applicant's acknowledgement of potential impacts on this designated area.

These submissions indicate the applicant's intention to comply with relevant derogation provisions, seeking to mitigate any identified harm through appropriate compensation measures. The focus on the guillemot population underscores the recognised sensitivity of this species within the Special Protection Area, and the need for targeted management strategies to address potential ecological consequences.

Nonetheless, it remains clear that the applicant's position anticipates a degree of uncertainty, as they acknowledge that the Scottish Ministers may ultimately reach a different conclusion regarding the likelihood of adverse effects. Therefore, while the submitted derogation and compensation documents form a key component of the application, further scrutiny will be necessary to establish whether the proposed measures are sufficient to satisfy statutory environmental safeguards.

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 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.

1.1.845 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, as presented, relies fundamentally on the conclusions drawn in other sections of the Environmental Impact Assessment, particularly those concerning landscape, heritage, and socio-economic factors. However, these baseline assessments have been demonstrated to understate the extent of the effects, as previously detailed. This initial underestimation directly influences the cumulative assessment, which consequently begins from a reduced baseline. As a result, the combined effects of the proposed development, when considered alongside existing, consented, and foreseeable projects, are correspondingly understated. This reliance on flawed baseline data undermines the reliability of the cumulative impact assessment, leading to an incomplete understanding of the true combined effects. Therefore, it is concluded that the assessment fails to adequately capture the full scale of cumulative impacts, necessitating a reassessment based on more accurate baseline information.

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.

1.1.846 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 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 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 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 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.

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 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.

1.1.847 Personal Observations

In addition to the planning matters above, I am personally concerned because: There has been insufficient assessment of the impact on marine cetaceans. This will impact the dolphin and whale population which is incredibly rich in the area. Additionally, this is an area of important heritage and a site of religious significance. People visit Iona specifically for its reputation of serenity and natural beauty, and by undermining that the site will in turn undermine the income the island derives from tourism. For example there is a working monastery on the island which is almost entirely dependent on religious tourism. Additionally, in what way will this development bring any benefits or prosperity to the community? Of course we need renewables but this is not a sensible place to put a windfarm of this magnitude because of its negative effects on a landscape of ecological and visual importance.

Based on my own local knowledge, I also wish to highlight that: Yes, the cetacean population needs to be better considered and I believe concerns have been raised by the Hebridean Whale and Dolphin Trust which is a reputable scientific organisation.
The fact that this is a site of religious importance does not seem to have been taken into account at all.

Finally, I would also ask the Scottish Ministers to consider: What benefit will the local community or even the country see from this development? What are our plans to actually gain any prosperity from our renewable resources rather than letting this go to other people?

1.1.848 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 692
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.

1.1.849 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 has not shown that reasonable steps have been taken to mitigate adverse effects arising from the proposal on these interests. As the Scottish Ministers are also required to have regard to these duties in determining the application, the identified deficiencies and omissions in addressing these statutory requirements weigh decisively against the granting of consent.

The application fails to provide the required environmental impact assessment and habitats regulations assessment as mandated by law, rendering the proposal non-compliant with statutory requirements. Under The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the equivalent marine works regulations, it is mandatory to identify, assess, and report the likely significant environmental effects of the proposal prior to any determination. Additionally, the Habitats Regulations require a thorough assessment of the proposal's 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 these assessments constitute a direct conflict with the legal and policy framework. Consequently, these failures 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 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 meet the fundamental responsibility of demonstrating compliance with all relevant legal and policy requirements through robust, objective, and proportionate evidence. It is a well-established principle that the burden lies with the applicant to prove that every statutory duty, planning policy, and environmental assessment requirement has been satisfied. In this case, the evidence submitted does not fulfill this evidential burden.

Specifically, the applicant's documentation reveals deficiencies and omissions that have not been adequately addressed. There is a lack of clear, comprehensive proof that all applicable statutory duties and planning policies have been complied with. Furthermore, the evidence identifies conflicts with the legal and policy framework that remain unresolved. These shortcomings are material and significant, and they weigh decisively against the granting of planning consent.

In the absence of satisfactory demonstration of compliance, the proposal cannot be considered lawful or policy-compliant. The failure to discharge this evidential responsibility undermines the legitimacy of the application and justifies refusal.

1.1.850 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.

1.1.851 Seascape, Landscape and Visual Effects

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 fails to demonstrate adequate mitigation when assessed against the requirements of key planning policies safeguarding landscape and seascape interests. Specifically, the applicant has not shown that its conclusions regarding the scale of the acknowledged effects align with its own assessment methodology. Consequently, there is no clear evidence that the proposal complies with the protections afforded to nationally important landscapes and seascapes. These shortcomings engage the provisions of National Planning Framework 4, notably Policies 4(c) and 4(d), Policies 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. Taken together, this indicates that the proposal does not meet the necessary policy standards intended to safeguard these valued environmental assets.

1.1.852 Cultural Landscape, Archaeology and Historic Environment

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

The 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.

1.1.853 Effects on Island Communities, Tourism and the Local Economy

The proposed development presents a significant threat to the fundamental economic and social sustainability of the island communities affected. These communities rely exceptionally heavily on visitors, who are drawn specifically by the very qualities identified in the applicant’s own baselines: landscape, seascape, cultural heritage, tranquillity and remoteness. Any alteration to these attributes would directly undermine the economic foundation upon which these communities depend. Such an impact would extend beyond immediate economic concerns, jeopardising local services, resident populations and the long-term viability of these island communities. It is therefore essential to consider carefully how this proposal could erode the very factors that sustain these unique and vulnerable places.

The applicant’s 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.

1.1.854 Ecology, Biodiversity and Habitats Regulations

The development site encompasses Priority Marine Features and Annex I habitats, indicating its high ecological value. Additionally, the surrounding waters are known to support significant populations of seabirds, marine mammals, and basking sharks. This rich biodiversity underscores the environmental sensitivity of the area and the need for careful consideration of any activities proposed within it.

The proposed development entails large-scale construction, operation, and eventual decommissioning over a period spanning several decades. Such prolonged and extensive intervention presents a substantial risk of adverse environmental effects on the designated marine features and protected species. Given the ecological importance of the site and its surroundings, the potential for significant negative impacts must be thoroughly assessed and addressed to ensure adequate protection of these vulnerable marine ecosystems.

The applicant's submission of 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 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.

1.1.855 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 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 demonstrate compliance with GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the Environmental Impact Assessment Regulations regarding project splitting. Specifically, the cumulative and in-combination effects of the proposal, as well as the impacts of the project in its entirety, have not been reliably identified or assessed. This omission raises significant concerns about the adequacy of the environmental appraisal and undermines the robustness of the decision-making process. Consequently, it is essential that the determination explicitly addresses the treatment of any deferred works to ensure full consideration of all potential effects, in accordance with the relevant policy and regulatory requirements.

1.1.856 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 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.

1.1.857 Effects on Local Area

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

The applicant's assessment acknowledges the 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 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 consider the significant effects on mainland and island communities that have direct views of the proposed development and rely economically on the seascape. This omission undermines the completeness of the evaluation and risks overlooking important social and economic impacts. For example, Gigha, a community-owned island celebrated nationally for its regeneration, faces the development waters from the east, yet no examination has been made of how the project might affect its delicate community balance and local economy.

Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard which attract visitors throughout the peninsula. These seaward panoramas represent precisely the receptors that the

applicant’s distance-based visual impact mitigation approach fails to address adequately. The absence of specific assessment for this area is a notable gap given its established role in local tourism and community identity.

Furthermore, the chain of communities along the west coast of Kintyre, whose character and visitor economy are shaped by the open Atlantic seaboard facing Islay, Jura, and surrounding waters, have been similarly neglected. The same applies to the Treshnish Isles and other small islands and mainland coasts with views towards the development site. Together, these omissions indicate a systemic failure to evaluate effects on key receptors, thereby compromising the reliability of the applicant’s overall assessment.

The applicant’s environmental impact assessment systematically 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.

1.1.858 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the requirements set out by the relevant statutory and policy frameworks. The applicant’s own evaluation acknowledges considerable impacts on nationally designated landscapes, as well as on the cultural heritage and communities along this coastal area. 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. Although the detrimental effects on the island communities concerned were recognised, they have never been properly assessed. In addition, the ecological safeguards mandated by applicable tests have not been demonstrated as achievable. It is also noteworthy that only a portion of the project is currently under consideration by Scottish Ministers.

In light of these significant 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 decide against refusal, it is requested that they require the submission of further environmental information and enhanced visualisations. Moreover, the applications should only be determined following a public inquiry, enabling a comprehensive examination of the issues raised in this objection. Regardless of the outcome, I further ask that the Ministers

explicitly address and record their conclusions regarding the effects on cultural heritage and the impacted island communities within their 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 693
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.

1.1.859 Cultural Landscape, Archaeology and Historic Environment

The cultural significance of the heritage assets affected by the proposal encompasses a complex array of qualities, including pilgrimage, arrival by sea, movement through a living cultural landscape, the interrelationships between monuments, spirituality, and the surrounding landscape and seascape. These attributes are principally experienced dynamically through movement rather than from static viewpoints, as acknowledged within the applicant’s own baseline assessment. This nuanced experiential dimension implies that any assessment of heritage impact must adequately capture the full extent of these broader cultural and landscape qualities to avoid underestimating potential harm.

Historic Environment Scotland’s consultation responses, as recorded in the application, underscore this point by requesting additional viewpoints to ensure that these wider qualities are properly represented in the assessment. The applicant’s current approach appears insufficient in this regard, potentially overlooking significant experiential and contextual factors that contribute to the heritage assets’ cultural value. It is therefore imperative that the assessment methodology be expanded to include these broader landscape and experiential elements to provide a comprehensive understanding of the proposal’s impact on heritage significance.

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.

1.1.860 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.

1.1.861 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.

1.1.862 Further Comments

Having visited Iona and Mull many times over the years, I know how special these islands are. Their character is defined by the vast seas, unspoilt island views, dark skies, wildlife and tranquillity that make this part of Scotland so unique. Iona holds a particularly special place in my heart, as I am named after the island. I am deeply concerned that the proposed offshore wind development would industrialise the Inner Hebrides and permanently alter the horizon that has remained largely unchanged for generations. The waters around Mull and Iona support an abundance of wildlife and are central to the islands' natural heritage. These fragile and unique communities, landscapes and ecosystems deserve the highest level of protection.

1.1.863 Summary

The proposal for the MachairWind Offshore Wind Farm fails to meet the necessary statutory and policy requirements guiding its determination. The applicant’s own evaluation acknowledges substantial impacts on nationally designated landscapes, as well as on the cultural heritage and communities along this coastline. Furthermore, published reviews of the applicant’s documentation reveal a systematic understatement of the magnitude of these effects. Crucially, the mandatory heritage assessment has not been conducted, and the consequences for the island communities affected have been identified but remain unassessed. In addition, the ecological criteria essential for approval have not been demonstrated as achievable. It is also important to note that only a portion of the project is currently before the Scottish Ministers for consideration.

In light of these significant shortcomings, I respectfully urge the Scottish Ministers to refuse consent for this Offshore Wind Farm proposal and to reject the related marine licence application.

Should the Ministers be disinclined to refuse the applications outright, I request that they require the submission of additional environmental information and enhanced visualisations. Moreover, I propose that the determination of these applications be deferred until a public inquiry is held, allowing for a thorough examination of the issues raised within this objection. Regardless of the final decision, I further ask that the Ministers provide explicit conclusions within their stated reasons concerning the impacts on both cultural heritage and the affected island communities.

Yours faithfully,

[Redacted]

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

Member of the public 694
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.

1.1.864 Legislative and Policy Framework

The applicant’s submission fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be considered and given due weight during the decision-making process. This statutory obligation is clear and unequivocal, as set out in the Act and reiterated in the applicant’s own evidence (S01).

A thorough examination of the proposal reveals significant deficiencies and omissions in addressing these statutory requirements. The applicant has not provided adequate evidence to show that the interests of island communities have been properly identified, assessed, or balanced in the planning application. There is no substantive analysis or documentation evidencing meaningful engagement with island communities or consideration of their specific social, economic, and environmental circumstances as required by the Act.

Furthermore, the absence of demonstrable compliance with the Islands (Scotland) Act 2018 constitutes a direct conflict with the applicable legal and policy framework. As established in the applicant’s evidence (S01), where such compliance is not shown, or where deficiencies and omissions exist, these matters must weigh against the granting of consent.

In conclusion, the proposal fails to meet the statutory duty imposed by the Islands (Scotland) Act 2018 to properly consider and give due weight to the interests of island communities. This failure represents a material defect in the application and provides a clear and compelling basis for refusal.

1.1.865 Seascape, Landscape and Visual Effects

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

1.1.866 Cultural Landscape, Archaeology and Historic Environment

The applicant's assessment methodology, while adopting Historic Environment Scotland's recognised approach, falls short in demonstrating the required evaluative analysis of setting integrity, thereby undermining the reliability of its conclusions regarding heritage impacts. Although the methodology rightly distinguishes visual change from adverse impact and mandates an evaluation of how changes affect the contribution of setting to cultural significance, the applicant's operational assessment relies heavily on descriptive elements such as visibility, distance, monument prominence, retained views, screening, and skyline occupation. However, it stops short of articulating how these factors collectively inform a judgement on whether the integrity of setting is maintained, as required by the methodology. This shortcoming is clearly identified in a published Methodological Audit, which, using the applicant's own Appendix 14.3, reveals that while heritage attributes are acknowledged, the crucial evaluative step that the methodology demands is absent from all examined examples. Consequently, without this essential analysis, the assessment's conclusions that the integrity of setting is adequately retained cannot be substantiated with confidence.

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 applicant's evidence recognises a fundamental interdependence between the landscape assessment and the heritage impact conclusions. It is explicitly acknowledged that the heritage conclusions rely upon the landscape assessment as a foundational element. Where the landscape effects have been understated, as identified in preceding analysis, the heritage conclusions that build upon this assessment inevitably inherit the same understatement. This linkage highlights a critical vulnerability in the overall appraisal, as any deficiencies in the landscape analysis directly compromise the accuracy and credibility of the heritage impact findings.

Given this dependency, it follows that the heritage conclusions cannot be regarded as robust where the underpinning landscape assessment fails to fully capture the extent of effects. The understatement of landscape impacts effectively results in a corresponding understatement of heritage effects, thereby diminishing the reliability of the heritage impact conclusions presented. This concern undermines confidence in the planning appraisal's ability to adequately safeguard heritage assets, signalling the need for a more rigorous and transparent evaluation of landscape effects to inform a credible heritage impact 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.

1.1.867 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development rely to an exceptional degree on visitors, whose presence underpins the local economy and social fabric.

These visitors are attracted specifically by the qualities identified in the applicant's own baseline assessments: the landscape, seascape, cultural heritage, tranquillity and remoteness of the area. Any changes to these defining characteristics would directly undermine the economic foundations of these communities. This, in turn, would jeopardise the provision of essential services, threaten population stability and ultimately compromise the long-term viability of the island settlements.

The applicant's 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.

1.1.868 Ecology, Biodiversity and Habitats Regulations

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

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

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

The applicant's submission of a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan constitutes a critical element in the assessment of potential adverse impacts on the North Colonsay and Western Cliffs Special Protection Area. These documents acknowledge the possibility that the proposed development may affect the integrity of this protected site, specifically targeting the guillemot population, and are indicative of the applicant's recognition that such impacts cannot be definitively excluded at this stage. By preparing these

documents, the applicant is addressing the requirements set out under derogation provisions, which are invoked when adverse effects on a protected site are uncertain but cannot be ruled out. It is important to note that, as per the applicant's own position, the Scottish Ministers retain the discretion to reach a different conclusion regarding the presence or absence of adverse effects on site integrity. Therefore, the submission of these derogation and compensation documents is both a procedural necessity and a substantive acknowledgment of potential environmental risks associated with the proposal. This measure should be seen as an integral part of the application, reflecting a responsible approach to managing possible impacts on protected ecological interests.

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 application fails to demonstrate compliance with the statutory tests designed to protect internationally important habitats and species, a fundamental requirement that cannot be overlooked. Specifically, the evidence submitted, including the applicant's own derogation documents, reveals significant uncertainty regarding the satisfaction of these legal protections. This lack of demonstrated compliance undermines the integrity of the application and the assurances provided concerning ecological safeguarding.

It is essential to recognise that the statutory framework demands a clear and unequivocal demonstration that the proposed development will not adversely affect internationally important ecological features. The applicant's failure to meet this standard is not a minor procedural shortcoming but a critical deficiency that strikes at the heart of environmental protection obligations. Without robust evidence to satisfy the relevant tests, granting consent would conflict with established legal requirements and the principles of sustainable development.

In conclusion, the application does not provide the necessary certainty that the statutory protections for internationally important habitats and species will be upheld. This fundamental failure renders the case for granting consent unsound. Accordingly, the application should be refused to ensure that the statutory duties to protect these valuable ecological assets are fully respected and enforced.

1.1.869 Cumulative and In-Combination Effects

There is a fundamental uncertainty regarding the reliability of the cumulative impact assessment presented, stemming from the baseline assessments upon which it depends. Specifically, the cumulative assessments rely directly on conclusions drawn in other parts of the Environmental Impact Assessment. If, as indicated, the underlying evaluations of landscape, heritage, and socio-economic effects understate the true impacts, then the cumulative assessment inherently begins from this diminished baseline. Consequently, the combined effects of the proposal alongside existing, consented, and foreseeable developments are similarly understated. This flawed foundation casts doubt on the accuracy of the cumulative impact conclusions, suggesting that the true extent of combined effects has not been fully recognised or appropriately addressed.

The applicant's submission fails to comply with the requirements set out in GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the Environmental Impact Assessment Regulations concerning project splitting. Specifically, there is no adequate demonstration that the cumulative and in-combination effects of the proposal, nor the impacts of the project in its entirety, have been thoroughly identified or assessed. Furthermore, the approach to deferred works remains unaddressed in the application. It is therefore essential that the decision-making process explicitly considers these deferred elements to ensure full compliance with policy and regulatory obligations.

1.1.870 Effects on Local Area

The applicant's assessment notably underestimates the scale and significance of visual, community, and heritage impacts on Iona, thereby compromising the accuracy of the environmental and social impact evaluation. The Coastal Character assessment identifies the Sound of Iona as an area of High sensitivity, with extensive visibility and a Large geographical extent of change. The turbines would be visible across approximately 39 degrees of the horizon from a distance of some 21 kilometres, producing a Moderate and Significant overall effect. Similarly, the West Coast of Iona is recognised as highly sensitive, with widespread visibility; the applicant concedes significant effects on residents and visitors across much of the island, including at Dùn Ì, Iona's highest point.

Iona's monastic landscape, comprising internationally important heritage assets such as the Abbey, the Nunnery, and the high crosses, is intrinsically linked to experiences of pilgrimage, arrival by sea, and movement through the landscape. Despite Historic Environment Scotland's request for additional viewpoints—including from the ferry crossing itself—no visualisation is provided from the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn, an omission that weakens the thoroughness of the heritage impact assessment. Moreover, a household consultation on Iona revealed that 92 per cent of respondents oppose the proposal, yet the applicant's consultants fail to assess habitability, despite identifying it as a potential pathway of effect on the community. To contextualise the visual scale, the tallest turbines would exceed Ben Hynish on Tiree—visible from Iona at approximately 33 kilometres and standing 141 metres high—by roughly 194 metres, at a closer distance of around two-thirds of that range.

In light of these factors, the applicant's evaluation does not adequately reflect the magnitude of impacts on Iona's landscape, community, and heritage values. This underestimation undermines the credibility of the environmental and social impact assessment and calls for a more comprehensive and rigorous appraisal before the proposal can be properly considered.

1.1.871 Personal Observations

In addition to the planning matters above, I am personally concerned because: I'm from Maine, USA that has visited the Isle of Iona several times over the years, mostly staying at Martyr's Bay B&B. I've experienced the destruction these "farms" cause within my own state with no financial gain to the citizens. Other states might benefit some but mostly big, greedy & corrupt dark companies whose main object is to destroy sacred ground to gain more power & financial gain. Dark money.

Based on my own local knowledge, I also wish to highlight that: Iona is special, sacredness beyond imagination. Why must dark companies, entities continually destroy for more and more and more with no consideration for the islanders themselves and the wildlife. Sound & vibration will alter the health physically, emotionally, and the energies of Light .. oh wait .. that's the goal of the dark.. isn't it…

Finally, I would also ask the Scottish Ministers to consider: I have lots to say but I have found in my own State of Maine that those politicians involved are part of the dark with the decisions already made.

1.1.872 Further Comments

It makes me sad that a beloved island I've stayed a month at a time is even being considered for such a plan without an ounce of real data on how the sound & vibrations will cause dis-ease thus disease.. but then, that's the intent.. isn't it…

1.1.873 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy requirements governing its determination. Notably, the applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the cultural heritage and communities along this coastal region. Independent reviews of the submitted documentation reveal that the extent of these impacts has been underestimated, and that a comprehensive heritage assessment, as mandated, has not been conducted. Furthermore, while the proposal identifies effects on the island communities involved, it does not provide any formal assessment of these impacts. The ecological criteria necessary for approval have also not been demonstrated as achievable. Compounding these concerns, the application before the Scottish Ministers does not encompass the entirety of the project.

In light of these deficiencies, it is respectfully submitted that the Scottish Ministers should refuse consent for the MachairWind Offshore Wind Farm and decline the accompanying marine licence.

Should the Ministers consider otherwise, it is requested that additional environmental information and enhanced visualisations be sought. Moreover, determination of the applications should be deferred until after a public inquiry, enabling thorough examination of the issues raised within this objection. Irrespective of the final decision, it is also requested that the Ministers explicitly address and reach clear conclusions on the impacts upon cultural heritage and the affected island communities within their formal reasons.

Yours faithfully,

[Redacted]

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

Member of the public 695
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.

1.1.874 Personal Observations

In addition to the planning matters above, I am personally concerned because: I live outside uk but thinking of moving there. This affects everyone and everything!!!!

Based on my own local knowledge, I also wish to highlight that: Alle the wildlife in the air andcsea will be hughely affected. So many animals will die!!!!

Finally, I would also ask the Scottish Ministers to consider: Don’t do this. The arra will never be the same again

1.1.875 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 696
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.

1.1.876 Seascape, Landscape and Visual Effects

The applicant’s assessment methodology fails to establish a clear distance threshold beyond which major effects cease, undermining the reliability of its predicted impacts. Although Appendix 16.1 does not specify such a threshold, independent analysis of the applicant’s Chapter 16 and related appendices reveals a consistent pattern: no highly sensitive receptor situated beyond approximately 20 kilometres from the development area is assigned the highest magnitude of change, regardless of receptor sensitivity or visibility extent. This implicit distance-based limitation is further evidenced by the applicant’s own documentation, which acknowledges that for a coastal area over 30 kilometres away, the scale of change is considered small due to viewing distance. Moreover, the Landscape Character synthesis categorises magnitude of effect as High within roughly 20 kilometres, Medium between 20 and 30 kilometres, and Low beyond 30 kilometres for certain landscape types. Such systematic moderation of magnitude at distances coinciding with the location of the most sensitive designated landscapes effectively understates the inputs to the protective tests. Consequently, the conclusions drawn from this methodology cannot be regarded as a reliable description of the effects that Scottish Ministers are being asked to consent.

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

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

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

1.1.877 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 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 provide adequate mitigation measures to ensure the protection of internationally and nationally important heritage assets, as required under the relevant planning policies. Notably, it does not comply with the provisions of NPF4 Policy 7, specifically subparagraphs (h) relating to scheduled monuments and (c) and (d) concerning their settings, alongside GEN 6 and the guidance

contained within paragraphs 4.22 to 4.23 of the National Marine Plan. These policies collectively establish a clear framework for safeguarding cultural heritage, requiring a thorough assessment and demonstration that the significance of such assets and their settings will be preserved.

Moreover, the applicant has not furnished the necessary evidence to confirm that the cultural significance of the heritage assets will be maintained. The Scottish Ministers, therefore, lack the comprehensive assessment required to form a conclusion on this matter. In the absence of such a critical evaluation, the proposal cannot be deemed compliant with the statutory policy framework intended to protect heritage assets. Consequently, the application as it stands undermines the acceptability of the development from a heritage protection standpoint.

1.1.878 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 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 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.

1.1.879 Ecology, Biodiversity and Habitats Regulations

The proposed development presents a significant risk of adverse environmental effects due to its location within an ecologically sensitive area. Priority Marine Features and Annex I habitats are present within the development site itself, indicating a high level of ecological importance. Furthermore, the surrounding waters provide habitat for protected species, including seabirds, marine mammals, and basking sharks. The scale and duration of the proposed construction, operational, and decommissioning activities—extending over several decades—would exert considerable pressure on these vulnerable ecosystems. Given the presence of such valuable marine biodiversity and the potential for substantial disturbance, the development is likely to result in significant environmental harm. It is therefore imperative that this ecological sensitivity is fully recognised and appropriately addressed in any planning decisions.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan specifically addressing the guillemot population at 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 this application highlights the applicant’s acknowledgement of potential impacts on this designated area.

These submissions indicate the applicant's intention to comply with relevant derogation provisions, seeking to mitigate any identified harm through appropriate compensation measures. The focus on the guillemot population underscores the recognised sensitivity of this species within the Special Protection Area, and the

need for targeted management strategies to address potential ecological consequences.

Nonetheless, it remains clear that the applicant's position anticipates a degree of uncertainty, as they acknowledge that the Scottish Ministers may ultimately reach a different conclusion regarding the likelihood of adverse effects. Therefore, while the submitted derogation and compensation documents form a key component of the application, further scrutiny will be necessary to establish whether the proposed measures are sufficient to satisfy statutory environmental safeguards.

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.

1.1.880 Public Engagement, Site Selection and Environmental Information

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

1.1.881 Effects on Local Area

The applicant's assessment significantly underestimates the direct and substantial effects of the proposed development on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Although Islay and Colonsay lie immediately adjacent to the development area—Islay to the south-east and Colonsay to the east—the application predominantly considers Islay only as a potential project location rather than as a distinct island community subject to direct impacts. This approach fails to recognise that Islay's Atlantic-facing communities confront the nearest edge of a 448 square kilometre development zone, without any place-specific evaluation of consequences for their local setting, economic activities, or community life. Similarly,

Colonsay and Oronsay's daily experience is defined by their seaward outlook facing the array directly. The North Colonsay and Western Cliffs Special Protection Area, located on Colonsay's coastline, forms the focus of the applicant's derogation case and compensation proposals, implicitly acknowledging that harm to the internationally protected seabird populations cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance situated within this community, has its open maritime setting inadequately addressed, reflecting the broader deficiencies identified in the heritage assessment. These omissions collectively undermine the reliability and completeness of the environmental and heritage impact evaluation.

The applicant's assessment of 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 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 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 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.

1.1.882 Personal Observations

In addition to the planning matters above, I am personally concerned because: This area is unspoiled natural beauty and nature.

Based on my own local knowledge, I also wish to highlight that: Yes. The sea creatures and birds and residents and visitors

Finally, I would also ask the Scottish Ministers to consider: Put ugly disruptive electric stations in ugly places that have already been ruined by short sighted greedy humans and not where more incredible nature will not be disturbed.

1.1.883 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 697
Dear Sir/Madam,

I hereby submit a formal objection to the MachairWind Offshore Wind Farm proposals, corresponding to 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. I request that this correspondence be recorded as an objection, that my status as an objector be acknowledged, and that I receive notification of the final determination regarding these applications.

The proposals envisage the construction of an offshore wind farm with an installed capacity of approximately 2 gigawatts, consisting of between 91 and 144 turbines. Each turbine would reach a maximum height of 335 metres to blade tip. The development area encompasses around 448 square kilometres of marine space situated to the north-west of Islay and west of Colonsay, lying approximately 21 kilometres from Iona. The location is adjacent to the islands and coastal communities within the southern Hebrides.

This objection is founded on planning and environmental grounds, assessed within the statutory and policy framework that governs the determination of these applications. It is incumbent upon the applicant to provide sufficient evidence to satisfy the relevant statutory tests. The onus is not on objectors to disprove the proposals but on the applicant to prove compliance. Having carefully considered the submissions, it is evident that the applicant has failed to meet this evidential burden. Consequently, I contend that the applications should be refused consent.

1.1.884 Legislative and Policy Framework

The application fails to demonstrate adequate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989. This Schedule explicitly requires the applicant to have regard to the desirability of preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, as well as protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant must take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The evidence before the determining authority does not establish that these requirements have been sufficiently addressed or fulfilled.

In addition, the Scottish Ministers, as the determining authority, are mandated by the same statutory duties to have regard to these considerations when deciding the application. The absence of demonstrated compliance, coupled with identified deficiencies and omissions in the evidence submitted, constitutes a direct conflict with the applicable legal and policy framework. Such failures weigh decisively against the granting of consent for this proposal.

The marine licence application 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 applicant's submission acknowledges that National Planning Framework 4 (NPF4) is a significant material consideration and that Policies 3, 4, 7, and 11 are engaged by this proposal, addressing biodiversity, natural places, historic assets, and energy respectively. This recognition confirms the relevance of these policies and the statutory duties and legislative requirements that must be applied in the determination of the application.

However, the evidence before the determining authority does not demonstrate compliance with these key policies. There are identified deficiencies and omissions in the applicant's documentation that fail to adequately address the protection and enhancement of biodiversity and natural places as required by Policies 3 and 4. Similarly, the proposal does not sufficiently consider the impact on historic assets and places in accordance with Policy 7. Furthermore, the application lacks clear evidence of conformity with Policy 11 relating to energy, leaving significant uncertainties unresolved.

Given these shortcomings, the proposal conflicts with the applicable legal and policy framework established by NPF4. As stated in the evidence, where compliance has not been demonstrated or where deficiencies and conflicts exist, these matters weigh against the granting of consent. Therefore, the application should be refused

on the basis that it fails to meet the essential requirements of NPF4 and its associated policies.

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 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 demonstrating compliance with every relevant statutory duty, planning policy, and environmental assessment requirement. This failure to meet the evidential burden means that significant deficiencies and omissions remain unaddressed, resulting in unresolved conflicts with the applicable legal and policy framework. As established, where such compliance is not demonstrated, these shortcomings must weigh decisively against the granting of consent. Therefore, on the basis of the applicant's inability to prove full compliance with all legal and policy obligations, this application should be refused.

1.1.885 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 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 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 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.

1.1.886 Cultural Landscape, Archaeology and Historic Environment

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

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

While the applicant'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 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 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.

1.1.887 Effects on Island Communities, Tourism and the Local Economy

The island communities affected by the proposed development rely heavily on visitor numbers, with the latter drawn specifically by the very qualities the applicant's own baseline assessments identify: landscape, seascape, cultural heritage, tranquillity and remoteness. Any alteration to these attributes would directly undermine the fundamental economic base that sustains these communities. This dependency means that changes to the environment risk precipitating a decline not only in tourism revenue but also in essential local services and population stability.

Such a decline poses a serious threat to the long-term viability of these island settlements. The economic and social sustainability of the islands is intrinsically linked to the preservation of their unique visitor-attracted characteristics. Therefore, the proposal's impact on these key qualities must be given paramount consideration, as it jeopardises the continued existence and prosperity of the island communities themselves.

The applicant's own consultants acknowledge that habitability constitutes a potentially significant pathway through which the proposal could impact island communities. Despite this recognition, no specific assessment of the habitability of the affected islands was undertaken. Instead, the socio-economic appraisal presented in Chapter 18 focuses predominantly on the regional scale, providing detailed examination of potential port communities but omitting an equivalent place-based analysis for the island communities most directly facing the development. This approach nonetheless leads to the conclusion that these island communities possess low sensitivity to tourism effects.

However, this conclusion warrants careful scrutiny. Small island economies are not simply reflective of regional averages; rather, their economic structures are often heavily concentrated in sectors that are particularly vulnerable to changes in the characteristics that attract visitors. Moreover, their reliance on increasing visitor numbers does not serve to mitigate this sensitivity but rather intensifies dependence on the very qualities that may be at risk from the proposed development. Therefore, the assessment's failure to conduct a place-based analysis undermines the validity of the low sensitivity conclusion.

In light of this, the socio-economic assessment methodology employed by the applicant is flawed and insufficient for understanding or mitigating the potential impacts on island communities. A more detailed, island-specific evaluation is necessary to accurately capture the sensitivity and vulnerabilities of these communities, ensuring that any consequential effects are properly identified and addressed. Without such an approach, the assessment risks overlooking significant adverse socio-economic consequences.

The proposal fails to comply with the 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.

1.1.888 Ecology, Biodiversity and Habitats Regulations

The proposed development presents a significant risk of adverse environmental effects due to its location within an ecologically sensitive area. Priority Marine Features and Annex I habitats are present within the development site itself, indicating a high level of ecological importance. Furthermore, the surrounding waters provide habitat for protected species, including seabirds, marine mammals, and basking sharks. The scale and duration of the proposed construction, operational, and decommissioning activities—extending over several decades—would exert considerable pressure on these vulnerable ecosystems. Given the presence of such valuable marine biodiversity and the potential for substantial disturbance, the development is likely to result in significant environmental harm. It is therefore imperative that this ecological sensitivity is fully recognised and appropriately addressed in any planning decisions.

The submission of a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan by the applicant 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 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 satisfy the statutory tests is that the protection of internationally important habitats and species cannot be assured, which fundamentally undermines the justification for granting consent. Without clear demonstration that these legal requirements are met, the risk of harm to designated ecological features remains unacceptably high.

The evidence submitted, including the applicant's own derogation documents, reveals significant uncertainty regarding compliance with the necessary statutory criteria. This uncertainty indicates that the applicant has not provided sufficient assurance that the proposed development will avoid adverse impacts on protected habitats and species of international importance.

Given the applicant's inability to meet the statutory tests, it is clear that the application does not fulfil the legal obligations designed to safeguard critical ecological assets. Consequently, the case for granting consent is not made, and the application should be refused to ensure the continued protection of these internationally significant environmental features.

1.1.889 Cumulative and In-Combination Effects

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

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

The applicant's submission fails to demonstrate compliance with GEN 21, paragraph 4.85 of the National Marine Plan, NPF4 Policy 11(e), and the Environmental Impact Assessment Regulations regarding project splitting. Specifically, the cumulative and

in-combination effects of the proposal, as well as the impacts of the project in its entirety, have not been reliably identified or assessed. This omission raises significant concerns about the adequacy of the environmental appraisal and undermines the robustness of the decision-making process. Consequently, it is essential that the determination explicitly addresses the treatment of any deferred works to ensure full consideration of all potential effects, in accordance with the relevant policy and regulatory requirements.

1.1.890 Public Engagement, Site Selection and Environmental Information

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

The Environmental Impact Assessment submitted with this application is insufficient for the Scottish Ministers to make a fully informed decision. While the assessment covers various topics, it fails to investigate identified pathways to significant effects comprehensively. For example, the landscape assessment's conclusions are based on a distance pattern not supported by its own stated methodology. Similarly, the heritage assessment does not adequately apply the integrity test it claims to use, and the socio-economic assessment lacks any place-based analysis relevant to the affected islands. Furthermore, the application inappropriately relies on future assessments, post-consent plans, monitoring, and additional approvals to address uncertainties, which conflicts with the requirement under the EIA Regulations that likely significant effects be understood before determination. It is therefore clear that the applicant has not demonstrated that the environmental information provided is adequate for the Scottish Ministers to discharge their duty properly at this stage.

1.1.891 Effects on Local Area

The applicant's assessment significantly underestimates the direct and substantial effects that the proposed development would have on the communities, economy, and heritage of Islay, Colonsay, and Oronsay. Although Islay and Colonsay lie closest to the development area—which extends immediately north-west of Islay and west of Colonsay—the application primarily considers Islay from the perspective of its potential use as a project location rather than as an impacted island community in its own right. Crucially, the Atlantic-facing communities of Islay confront the nearest edge of a 448 square kilometre development zone, yet there is no place-based evaluation of how this proximity would affect their local setting, economic activities, or community life. This absence undermines the reliability of the environmental and heritage impact assessment for these islands.

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

The applicant's assessment 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.

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 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 characterises the South Tiree coastal area as possessing High sensitivity at a distance of approximately 35 kilometres while attributing a Low magnitude of change to the proposed development. This classification underpins the overall evaluation of the effects on Tiree's landscape character. However, this Low magnitude conclusion appears to underestimate the true extent of visual and perceptual impact that would arise from the introduction of large-scale turbines into this setting.

Tiree's landscape is uniquely defined by its exceptional low-lying topography, where the prominence of sea and sky shapes its distinctive character. The island's highest elevation, Ben Hynish, reaches only 141 metres, emphasising the openness and expansive nature of the oceanic horizon. The proposed turbines, reaching heights of up to 335 metres, would therefore represent unprecedented vertical elements within this seascape. Their scale and prominence would disrupt the island's characteristic sense of openness and natural order, introducing features that are entirely discordant with the existing landscape.

Given this context, the conclusion that the magnitude of change would be Low does not adequately reflect the sensitivity of Tiree's receptor or the scale of change introduced. The applicant's evaluation consequently presents an unreliable estimate of effects, failing to capture the significant alteration that such structures would impose on the island's sensitive and distinctive landscape character. This underestimation warrants careful reconsideration to ensure that the assessment fully recognises the true magnitude of impact on Tiree.

The applicant's assessment 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 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.

1.1.892 Personal Observations

In addition to the planning matters above, I am personally concerned because: It would impact the solidarity of a tight knit community

Based on my own local knowledge, I also wish to highlight that: Golden eagles and seabirds, health and habitat are a huge concern

1.1.893 Further Comments

The community's voice must be more important than a corporation's

1.1.894 Summary

The proposal before the Scottish Ministers fails to satisfy the statutory and policy requirements governing its determination. The applicant's own evaluation acknowledges significant impacts on nationally designated landscapes, as well as on the heritage and communities along this coastal area. However, published analyses of the applicant's documentation reveal that the extent of these impacts has been

underestimated. Crucially, the necessary heritage assessment has not been conducted, and although effects on the island communities involved were identified, no comprehensive assessment of these impacts has been undertaken. Furthermore, the ecological criteria pertinent to the proposal have not been demonstrated as achievable. It is also important to note that only a portion of the project is currently submitted for Ministerial consideration.

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

Should the Ministers consider proceeding without refusal, I request that they require the submission of further environmental information alongside enhanced visualisations. Moreover, I propose that the applications be determined only following a public inquiry, thereby allowing the issues raised in this objection to be thoroughly examined. Regardless of the decision reached, I further request that the Ministers provide clear conclusions within their reasons specifically addressing the effects on cultural heritage and the impacted island communities.

Yours faithfully,

[Redacted]

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

Member of the public 698
Dear Sir/Madam,

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

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

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

1.1.895 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 the desirability of preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, as well as protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant is 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 requirements have been satisfactorily addressed.

In addition, the Scottish Ministers, in their determination of the application, are similarly required to have regard to these statutory duties. Where compliance with these duties has not been demonstrated, or where the evidence reveals deficiencies, omissions, or conflicts with the applicable legal and policy framework, such matters must weigh against the granting of consent. Given the absence of demonstrated compliance and the presence of unresolved statutory concerns, the application should be refused.

The marine licence application must be refused as it fails to demonstrate compliance with the statutory requirements of Part 4 of the Marine (Scotland) Act 2010 and the

relevant policies of Scotland's National Marine Plan. Authorisation decisions under this legislation are mandated to accord with the National Marine Plan unless material considerations indicate otherwise. In this case, the application does not meet the necessary standards set out in key General Policies including GEN 4 (Co-existence), GEN 6 and paragraphs 4.22 to 4.23 (Historic Environment), GEN 7 and paragraph 4.28 (Landscape and National Scenic Areas), GEN 9 (Natural Heritage), GEN 13, GEN 18 (Engagement), GEN 19 and paragraph 4.81 (Sound Evidence), and GEN 21 and paragraph 4.85 (Cumulative Impacts). The absence of demonstrated compliance with these policies constitutes a fundamental deficiency in the application. Furthermore, the evidence identifies omissions and conflicts with the applicable legal and policy framework, which must weigh decisively against the granting of consent. Therefore, on the basis of the statutory assessment requirements and the failure to satisfy the National Marine Plan policies, the marine licence application should be refused.

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

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

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

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

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

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

The proposal fails to meet the fundamental requirements set out in the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and the corresponding marine works regulations, which mandate that the likely significant environmental effects of any development must be thoroughly identified, assessed, and reported prior to determination. This statutory obligation is not fulfilled in the current submission, resulting in a deficient environmental impact assessment that undermines the decision-making 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 relevant statutory tests. The absence of a comprehensive habitats regulations assessment leaves a critical gap in understanding the potential adverse impacts on protected habitats and species, thereby failing to satisfy legal requirements designed to safeguard biodiversity.

Given these clear deficiencies and omissions in both the environmental impact assessment and habitats regulations assessment, the proposal conflicts with the applicable legal and policy framework. Where such compliance has not been demonstrated, these shortcomings must weigh heavily against the granting of consent. The failure to provide adequate and lawful environmental assessments constitutes a substantive ground for objection to this 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 given due weight in the decision-making process. This statutory obligation is clear and unambiguous, establishing a legal framework within which proposals affecting island communities must be assessed.

The evidence before the determining authority reveals deficiencies and omissions in how the proposal addresses the interests of island communities. There is no satisfactory demonstration that these interests have been properly identified, evaluated, or balanced in accordance with the Act. Such shortcomings represent a failure to meet the statutory duty imposed by the Islands (Scotland) Act 2018.

Given that compliance with this legislative requirement has not been shown, and that the evidence identifies clear procedural and substantive gaps, these matters must weigh against the granting of consent. The proposal's failure to properly consider and give due weight to island communities' interests is a material planning concern that should lead to refusal.

The applicant 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.

1.1.896 Conflict with National Planning Framework 4 and the Development Plan

The proposal does not 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, such support is expressly contingent upon adherence to its impact criteria, including the protection of communities under Policy 11(c), and the safeguarding of landscape, seascape, and other receptors as required by 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 fails to demonstrate adequate protection for the cultural significance of scheduled monuments and their settings, nor does it show that island communities would be safeguarded. Additionally, the ecological assessments submitted do not satisfactorily establish that the necessary environmental tests can be met. Taken together, these shortcomings indicate a clear conflict with the key impact criteria of 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 applicant's evidence clearly indicates that the proposal conflicts with the terrestrial development plan framework relevant to land-based effects, including the

Argyll and Bute Local Development Plan 2. Specifically, the proposal would have adverse impacts on the landscape, heritage, and community interests that the policies within this plan are designed to protect. These conflicts are directly attributable to the nature and location of the development, which the plan seeks to safeguard through its provisions.

Furthermore, the proposal is not only at odds with the local development plan but also with the National Planning Framework 4 when considered in its entirety. The applicant has not provided sufficient justification or evidence to demonstrate that these conflicts can be reconciled or mitigated. Consequently, the proposal remains inconsistent with the established development plan framework, underscoring its unsuitability in the current form.

1.1.897 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 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 introduction of aviation and navigation lighting as part of the proposed development would result in a permanent alteration to the night-time seascape,

which is currently unlit. This change would persist for the entirety of the stated 35-year operational period, significantly modifying the visual character of the sea horizon during night hours. Such a transformation would be readily perceptible and may affect the qualities that currently define this coastal environment after dark.

Beyond the immediate practical impact, the decision to consent to the development carries a wider policy implication. Granting permission signals that the seascape is considered appropriate for wind farm use despite the acknowledged harm caused by lighting and its effect on the night-time character. This represents a broader acceptance of change to the seascape's intrinsic qualities, not limited to the operational lifespan but indicative of the long-term characterisation of the area within planning policy considerations.

The applicant's evidence acknowledges that the 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.

1.1.898 Cultural Landscape, Archaeology and Historic Environment

There is uncertainty surrounding the reliability of the applicant's assessment of heritage impacts due to apparent non-compliance with the required evaluation methodology. Although the applicant states that Historic Environment Scotland's recognised approach has been adopted, which involves evaluating whether changes affect the contribution setting makes to cultural significance and whether the integrity of setting is adequately retained, the application's conclusions warrant closer scrutiny.

A Methodological Audit, prepared independently in support of community objections and based entirely on the applicant's Appendix 14.3, highlights that while the operational assessment identifies relevant heritage attributes, it fails to demonstrate how the integrity of setting has been properly assessed against the applicant's own accepted methodology. The assessment focuses primarily on describing visual change—considering factors such as visibility, distance, monument prominence, retained views, screening, and skyline occupation—but does not present the necessary evaluative step required to determine the adequacy of setting integrity.

Consequently, the absence of this critical evaluative analysis undermines confidence in the assessment's conclusion that the integrity of setting is adequately retained.

This gap raises significant concerns about the robustness and credibility of the heritage impact conclusions drawn by the applicant and indicates that further clarification and methodological adherence are essential before the assessment can be relied upon.

The applicant's baseline assessment acknowledges that the cultural significance of the heritage assets in question arises from a complex set of qualities. These include aspects such as pilgrimage, arrival by sea, and movement through a living cultural landscape. It also recognises the importance of the relationships between monuments, spirituality, and the surrounding landscape and seascape, which are experienced dynamically through movement rather than from fixed viewpoints.

Historic Environment Scotland, in their consultation responses recorded within the application, requested the inclusion of additional viewpoints to ensure that these broader experiential qualities are fully captured. This suggests that the initial assessment may not have adequately represented the wider cultural landscape and the nuanced ways in which the heritage assets are appreciated and experienced.

Given these considerations, it is important that any further assessment or mitigation fully embraces the dynamic and relational nature of the cultural significance identified. Without this, the potential impacts on the heritage assets could be underestimated, leading to an incomplete understanding of the effect on the cultural landscape as a whole.

The applicant's heritage conclusions are fundamentally reliant on the findings of the landscape assessment. This dependency is critical, as the landscape assessment forms the evidential foundation upon which the heritage impact conclusions are constructed. Any shortcomings or inaccuracies within the landscape evaluation inevitably influence the validity of the heritage assessment.

It has been demonstrated that the landscape effects have been understated, as outlined in the preceding analysis. This understatement is not a trivial matter; rather, it represents a significant deficiency that affects the overall appraisal. Because the heritage conclusions are predicated on the landscape assessment, any minimisation of landscape impacts is directly transmitted into the heritage impact findings, thereby diminishing their reliability.

Consequently, the credibility of the heritage conclusions is compromised by the inherent weaknesses within the landscape assessment. A more robust and accurate landscape evaluation is essential to ensure that the heritage impacts are properly understood and fairly assessed. Without addressing these deficiencies, reliance on the current heritage conclusions remains questionable and potentially misleading.

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

demonstrable mitigation strategy, the proposed development cannot be considered to adequately protect these heritage assets or their surroundings.

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

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

This conclusion is fundamentally flawed. Small island economies cannot be equated with regional averages; their economic structures are heavily concentrated in sectors most vulnerable to changes in the qualities that attract visitors. The islands' reliance on increasing visitor numbers does not mitigate their sensitivity to potential adverse effects; on the contrary, it intensifies their dependence on the very attributes that the

proposal risks undermining. Drawing a conclusion of low sensitivity without conducting a thorough, place-specific analysis is therefore not supported by evidence but represents an unsubstantiated assumption.

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

The proposal fails to meet the 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.

1.1.900 Ecology, Biodiversity and Habitats Regulations

The development site encompasses Priority Marine Features and Annex I habitats, indicating its high ecological value. Additionally, the surrounding waters are known to support significant populations of seabirds, marine mammals, and basking sharks. This rich biodiversity underscores the environmental sensitivity of the area and the need for careful consideration of any activities proposed within it.

The proposed development entails large-scale construction, operation, and eventual decommissioning over a period spanning several decades. Such prolonged and extensive intervention presents a substantial risk of adverse environmental effects on the designated marine features and protected species. Given the ecological importance of the site and its surroundings, the potential for significant negative impacts must be thoroughly assessed and addressed to ensure adequate protection of these vulnerable marine ecosystems.

The applicant has submitted a Without Prejudice Derogation Case alongside a Without Prejudice Guillemot Compensation Plan 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 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.

1.1.901 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.

Because the baseline assessments for landscape, heritage, and socio-economic factors are understated, the cumulative impact assessment that relies on these foundations consequently underestimates the true combined effects. This means that the practical consequence of the cumulative assessment is that it does not fully capture the extent of harm when this proposal is considered alongside existing, consented, and foreseeable developments.

The cumulative assessment depends entirely on the conclusions drawn elsewhere in the Environmental Impact Assessment. If those individual assessments start from a diminished baseline, then the aggregated effects presented cannot be relied upon as accurate. Therefore, the cumulative impact evaluation lacks robustness and fails to provide a reliable basis for decision-making regarding the proposal's wider environmental and social consequences.

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.

1.1.902 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 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.

1.1.903 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 approach taken primarily views Islay in terms of its potential function as a direct project location, rather than as an affected island community in its own right. This perspective fails to provide a place-based evaluation of the effects on Islay's Atlantic-facing communities, which confront the nearest edge of the 448 square kilometre development area. Consequently, the assessment does not adequately consider the potential impacts on the setting, economy, or community life of these populations.

For Colonsay and Oronsay, the situation is more acute given that their seaward outlook directly faces the proposed array. 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 acknowledgement indicates an acceptance that harm to the internationally protected seabird population in this area cannot be excluded. Furthermore, Oronsay Priory, a scheduled monument of national importance, lies within this community's vicinity, yet the heritage assessment does not adequately address the impact on its open maritime setting. These deficiencies collectively undermine the reliability of the environmental and heritage impact evaluation for the communities, economy, and heritage of Islay, Colonsay, and Oronsay.

The applicant's assessment significantly underestimates the scale and impact of the proposed development on Iona, with practical consequences for the accuracy of the environmental and social impact evaluation. The Coastal Character assessment itself attributes a high sensitivity to the Sound of Iona, noting its direct orientation towards the development area, extensive visibility, and a large geographical extent of change. The overall effect is considered moderate and significant, with the turbines visible across approximately 39 degrees of the horizon at a distance of around 21 kilometres. Similarly, the West Coast of Iona is assessed as highly sensitive with widespread visibility, and the applicant concedes that significant effects would be experienced by residents and visitors throughout much of the island, including at Dùn Ì, the island's highest point. These findings demonstrate that the visual impact is not only extensive but also of substantial significance to the community and visitors.

Beyond visual effects, the applicant's evaluation fails to adequately address the profound heritage and community implications for Iona. The island's internationally important monastic landscape—including the Abbey, the Nunnery, and the high crosses—is recognised for its significance in pilgrimage and arrival by sea, elements inherently connected to views and movement through the landscape. Despite Historic Environment Scotland's request for additional visualisations, including from the ferry crossing, no visualisation has been provided from key vantage points such as the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn. Furthermore, a household consultation revealed that 92 per cent of respondents on Iona object to the proposal, yet the potential effect on habitability—a pathway acknowledged by the applicant's own consultants—was never assessed. The scale of the turbines relative to familiar landmarks also underscores the visual dominance; for instance, Ben Hynish on Tiree, which stands at 141 metres and is visible from Iona at approximately 33 kilometres, would be overtopped by the largest turbines by about 194 metres at roughly two-thirds of that distance. These considerations collectively highlight that the applicant's assessment does not fully capture the magnitude or significance of the impacts on Iona's community, heritage, and landscape.

The applicant's assessment fails to 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 significantly underestimates the impacts on important designated landscapes and vulnerable island communities, leading to inadequate protection of their natural and cultural qualities. Ulva, a community-owned island within the Loch na Keal National Scenic Area, is a small, re-establishing community whose recovery critically depends on the unspoilt seascape and setting at risk; yet, no assessment of effects on Ulva has been made. Similarly, Staffa, also within the Loch na Keal National Scenic Area and renowned as one of Europe's most celebrated small islands, lies approximately 35 kilometres from the development area—beyond the 30 kilometre threshold NatureScot recommended for assessing effects on National Scenic Area qualities. Despite acknowledging the panoramic maritime qualities of Staffa, the applicant concludes that the scale of change would be small and the effect not significant, a judgement that appears to downplay potential harm. The Jura National Scenic Area, assessed as having high sensitivity at a distance of 28 to 32 kilometres, is attributed only medium to low magnitude effects, justified by distance and retained landforms, even though its designation is founded on the wild, undeveloped character of its Atlantic outlook. The Scarba, Lunga and the Garvellachs National Scenic Area, situated approximately 35 to 40 kilometres away, is subject to a similar assessment approach. Taken together, these assessments fail to adequately reflect the significance of effects on these designated landscapes and island communities, thereby undermining the safeguards necessary to maintain their distinctive natural and cultural attributes.

The applicant's assessment 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 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 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.

1.1.904 Personal Observations

In addition to the planning matters above, I am personally concerned because: Destruction of natural habitats.

Based on my own local knowledge, I also wish to highlight that: Iona and mull

Finally, I would also ask the Scottish Ministers to consider: Do not have wind turbines in places of natural beauty

1.1.905 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 699
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.

1.1.906 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.

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 practical consequence of the proposal is that it would cause adverse effects on the landscape, heritage, and community interests safeguarded by the terrestrial development plan, including the Argyll and Bute Local Development Plan 2. These elements are fundamental to the local environment and identity, and their protection is a clear objective of the relevant policies. The proposal's impacts run contrary to these aims, resulting in tangible harm to the area's character and valued assets.

This conflict with the development plan framework is significant and cannot be overlooked. The proposal fails to align with the policies set out in the Argyll and Bute Local Development Plan 2 that are material to land-based effects, underscoring an inconsistency with the established planning framework. Furthermore, this discord extends to the National Planning Framework 4 when considered in its entirety, which the applicant has not successfully rebutted or mitigated through their submissions.

In conclusion, the proposal's adverse effects and policy conflicts demonstrate that it is not supported by the terrestrial development plan framework. Given the clear and substantive nature of these inconsistencies, the proposal should be regarded as contrary to the planning policies designed to protect the landscape, heritage, and community interests of Argyll and Bute. It follows that the proposal should be refused on these grounds.

1.1.907 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 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 of the night-time seascape character throughout the stated 35-year operational life. This fundamental change would transform the visual experience of the seascape after dark, introducing new and continuous light sources where none presently exist.

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

There remains significant uncertainty regarding the 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.

1.1.908 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.

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 heritage conclusions are fundamentally reliant on the findings of the landscape assessment. This dependency is critical, as the landscape assessment forms the evidential foundation upon which the heritage impact conclusions are constructed. Any shortcomings or inaccuracies within the landscape evaluation inevitably influence the validity of the heritage assessment.

It has been demonstrated that the landscape effects have been understated, as outlined in the preceding analysis. This understatement is not a trivial matter; rather, it represents a significant deficiency that affects the overall appraisal. Because the heritage conclusions are predicated on the landscape assessment, any minimisation of landscape impacts is directly transmitted into the heritage impact findings, thereby diminishing their reliability.

Consequently, the credibility of the heritage conclusions is compromised by the inherent weaknesses within the landscape assessment. A more robust and accurate landscape evaluation is essential to ensure that the heritage impacts are properly understood and fairly assessed. Without addressing these deficiencies, reliance on the current heritage conclusions remains questionable and potentially misleading.

There remains significant uncertainty regarding the 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.

1.1.909 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 have recognised habitability as a potentially significant pathway through which the proposal could impact island communities. Despite this acknowledgement, no assessment was undertaken to evaluate the habitability of the affected islands. Instead, the socio-economic assessment presented in Chapter 18 focuses primarily on regional-level analysis, providing detailed examination of potential port communities while neglecting a comparable place-based assessment of the island communities directly facing the proposed development. This approach culminates in a conclusion that these island communities exhibit low sensitivity to tourism effects, a finding reached without the benefit of specific, localized analysis.

Such a regional generalisation fails to capture the distinctive characteristics of small island economies, which are not accurately represented by regional averages. These economies tend to be highly concentrated in sectors most vulnerable to changes in the qualities that attract visitors. Rather than diminishing sensitivity, reliance on increasing visitor numbers intensifies dependence on the very attributes that may be compromised by the proposal. Therefore, the conclusion of low sensitivity derived without place-based analysis cannot be considered robust evidence but instead amounts to an unsubstantiated assumption. This fundamental flaw in the socio-economic assessment methodology undermines the ability to fully understand or appropriately mitigate impacts on the island communities concerned.

The proposal fails to meet the 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.

1.1.910 Ecology, Biodiversity and Habitats Regulations

The proposed development raises significant concerns due to the presence of Priority Marine Features and Annex I habitats within the site itself. This ecological sensitivity is compounded by the surrounding waters, which provide habitat for a range of protected species including seabirds, marine mammals, and basking sharks. Such environmental assets are of considerable conservation importance and warrant thorough consideration in the planning process.

The scale and duration of the proposed activities further intensify these concerns. Construction, operation, and eventual decommissioning are set to occur over several decades, introducing substantial disturbance into a highly sensitive marine environment. The potential for significant adverse environmental effects cannot be overlooked, particularly given the cumulative impacts that long-term, large-scale development may impose on these vulnerable species and habitats.

In light of these factors, careful assessment and robust mitigation strategies are essential to ensure that the ecological integrity of the site and its surroundings is maintained. Without clear evidence demonstrating that the proposal will not cause unacceptable harm to Priority Marine Features and protected marine species, there remains considerable uncertainty about the environmental acceptability of the development as currently proposed.

The applicant 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 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 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.

1.1.911 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 applicant has failed to demonstrate that the cumulative and in-combination effects of the proposed development, including the full scope of the project as a

whole, have been reliably identified and assessed. This omission directly contravenes 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 to consider the totality of impacts arising from a project to prevent project splitting. Furthermore, the Environmental Impact Assessment Regulations explicitly mandate comprehensive assessment of all related works to ensure informed decision-making. Notably, the treatment of deferred works has not been expressly addressed within the application, leaving a significant gap in the evaluation of potential environmental consequences. In light of these deficiencies, it is imperative that the decision-making process explicitly incorporates an assessment of the deferred elements and their cumulative effects before any consent is granted. Without such consideration, the proposal remains non-compliant with both planning policy and environmental regulation, and permission should accordingly be withheld.

1.1.912 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.

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.

1.1.913 Effects on Local Area

The applicant's assessment fails to adequately address the direct and significant effects on the communities, economy, and heritage of Islay, Colonsay, and Oronsay, thereby undermining the reliability of the overall environmental and heritage impact evaluation. Islay and Colonsay are the closest inhabited areas to the proposed development, which lies immediately north-west of Islay and west of Colonsay. Despite this proximity, the application primarily considers Islay in terms of its potential as a project location rather than as an affected community. Crucially, the Atlantic-facing communities of Islay confront the nearest edge of a 448 square kilometre development area, yet no place-based assessment is provided to evaluate how their setting, economic activities, or community life might be impacted. For Colonsay and Oronsay, the situation is similarly concerning. The seaward outlook, fundamental to daily life on these islands, faces the development directly. Notably, the North Colonsay and Western Cliffs Special Protection Area, which forms part of Colonsay's coastline, is central to the applicant's derogation case and compensation plan. This area is internationally protected for its seabird population, and the application itself acknowledges that harm to this population cannot be ruled out. Furthermore, Oronsay Priory, a scheduled monument of national importance, lies within this community's area, yet the heritage assessment fails to properly consider the impact on its open maritime setting. In sum, the applicant's underassessment of effects on Islay, Colonsay, and Oronsay results in a deficient appraisal of environmental and heritage impacts, calling into question the credibility of the application's conclusions.

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

The applicant's assessment acknowledges 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 characterises the South Tiree coastal area as possessing High sensitivity at a distance of approximately 35 kilometres while attributing a Low magnitude of change to the proposed development. This classification underpins the overall evaluation of the effects on Tiree's landscape character. However, this Low magnitude conclusion appears to underestimate the true extent of visual and perceptual impact that would arise from the introduction of large-scale turbines into this setting.

Tiree's landscape is uniquely defined by its exceptional low-lying topography, where the prominence of sea and sky shapes its distinctive character. The island's highest elevation, Ben Hynish, reaches only 141 metres, emphasising the openness and expansive nature of the oceanic horizon. The proposed turbines, reaching heights of up to 335 metres, would therefore represent unprecedented vertical elements within this seascape. Their scale and prominence would disrupt the island's characteristic sense of openness and natural order, introducing features that are entirely discordant with the existing landscape.

Given this context, the conclusion that the magnitude of change would be Low does not adequately reflect the sensitivity of Tiree's receptor or the scale of change introduced. The applicant's evaluation consequently presents an unreliable estimate of effects, failing to capture the significant alteration that such structures would impose on the island's sensitive and distinctive landscape character. This underestimation warrants careful reconsideration to ensure that the assessment fully recognises the true magnitude of impact on Tiree.

While the applicant's assessment applies distance-based mitigation measures to certain seascape receptors, this approach fails to address significant effects experienced by mainland and island communities with direct views and economic dependence on the seascape. Notably, Gigha, a community-owned island emblematic of island regeneration, faces the development waters from the east; yet, the impact on its delicate community balance and local economy remains unexamined. Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, offers panoramic views along the Hebridean seaboard that attract visitors throughout the peninsula. These seaward panoramas, precisely the receptors

subject to the contested distance-based mitigation, have not been adequately assessed. Furthermore, the west coast of Kintyre comprises a series of communities whose identity and visitor economy are intrinsically linked to the open Atlantic seaboard views towards Islay, Jura, and surrounding waters. The Treshnish Isles and adjacent small islands and mainland coasts sharing outlooks towards the development area are likewise excluded from comprehensive evaluation. This omission compromises the thoroughness of the applicant's environmental appraisal and undermines the reliability of conclusions regarding the seascape's wider social and economic sensitivities.

The applicant's environmental impact assessment applies a distance-based approach that systematically moderates the magnitude of change and discounts effects on highly sensitive receptors located beyond approximately 20 kilometres. Taken together, these places demonstrate a single proposition: wherever the applicant's assessment encounters such receptors beyond this threshold, the significance of impacts is diminished, and the communities residing in these areas have not been afforded any place-based assessment. This methodology undermines the integrity of the overall assessment by failing to adequately recognise or evaluate the real and potentially significant effects experienced by distant but sensitive populations.

1.1.914 Personal Observations

In addition to the planning matters above, I am personally concerned because: I enjoy visiting the west coast and the islands: this development will ruin the rugged character of the place. We should not be industrialising the highlands and islands of Scotland. The grid will be unable to cope with the energy this development generates anyway, so we'll end up paying for them not to generate it. It will be much cheaper to simply not build it. Scotland already generates more than enough electricity for itself. If England wants more electricity, put a massive wind farm in the lake district.

Based on my own local knowledge, I also wish to highlight that: The wind turbines are huge and will dominate the skyline for miles around.

Finally, I would also ask the Scottish Ministers to consider: This does not benefit Scotland. This will benefit Iberdrola, it's customers and shareholders. Any developments of this sort should be in public hands. We should not destroy our beautiful country so that others can become wealthy.

1.1.915 Further Comments

Stop industrialising the highlands and islands. Inward investment is just another way of saying asset stripping.

1.1.916 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 700
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.

1.1.917 Legislative and Policy Framework

The application fails to demonstrate adequate compliance with the statutory duties set out in Schedule 9 of the Electricity Act 1989. This Schedule mandates that the applicant must have regard to preserving natural beauty, conserving flora, fauna, and geological or physiographical features of special interest, as well as protecting sites, buildings, and objects of architectural, historic, or archaeological interest. Furthermore, the applicant is required to take reasonable steps to mitigate any adverse effects arising from the proposal on these interests. The evidence before the determining authority does not show that these requirements have been satisfactorily addressed.

In addition, the Scottish Ministers, in their determination, are also required to have regard to these statutory duties. The application’s failure to demonstrate compliance, coupled with identified deficiencies and omissions in addressing these legal obligations, constitutes a material conflict with the applicable legal and policy framework. Such shortcomings weigh decisively against the granting of consent for this proposal.

The applicant's submission 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 application fails to demonstrate compliance with these policies, as required by the Framework and associated legislation.

The evidence submitted with the application reveals deficiencies and omissions in addressing these critical policy areas. There is no satisfactory demonstration that the proposal will protect or enhance biodiversity in accordance with Policy 3, nor that it will conserve natural places as required by Policy 4. Similarly, the application does not adequately assess or mitigate impacts on historic assets and places, contrary to the requirements of Policy 7. Furthermore, the proposal lacks sufficient evidence to confirm compliance with Policy 11 on energy, including responsible energy use and sustainability considerations. Given these failures to meet the statutory and policy requirements of NPF4, and the absence of evidence to the contrary, these matters weigh decisively against the granting of planning consent.

The proposal fails to demonstrate compliance with the requirements of the Islands (Scotland) Act 2018, which mandates that the interests of island communities must be properly considered and given due weight in the decision-making process. This statutory obligation is not met, as the 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.

1.1.918 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.

In considering the proposal, it is important first to assess the mitigation measures in relation to the relevant policies within the National Planning Framework 4 (NPF4) that are designed to protect nationally important assets. Policy 11 must be read in conjunction with Policies 4(c) and 4(d), which safeguard National Scenic Areas and nationally important landscapes from significant adverse effects on the qualities for which they have been designated. Additionally, Policy 7, particularly Policy 7(h) concerning scheduled monuments and Policies 7(c) and 7(d) on the setting of historic assets, alongside Policy 3 relating to biodiversity, collectively establish a robust framework to ensure the preservation of designated assets.

Upon detailed examination, the proposal fails to satisfy these interconnected policies. It would result in significant adverse effects on nationally designated landscapes and seascapes, contravening the protections envisaged under Policies 4(c) and 4(d). Furthermore, the evidence submitted does not demonstrate that the cultural significance of scheduled monuments and their settings would be adequately safeguarded, thus conflicting with the requirements of Policy 7. The protection of island communities, an important consideration within these policies, has also not been assured. Finally, the ecological assessments provided fail to meet the necessary tests stipulated under Policy 3, leaving uncertainty as to whether biodiversity interests can be effectively protected.

In conclusion, the proposal does not comply with multiple relevant NPF4 policies intended to protect designated landscapes, heritage assets, and biodiversity, resulting in significant adverse impacts that cannot be satisfactorily mitigated on the basis of the current evidence.

The practical consequence of the proposal is that it would cause adverse effects on the landscape, heritage, and community interests safeguarded by the terrestrial development plan, including the Argyll and Bute Local Development Plan 2. These elements are fundamental to the local environment and identity, and their protection is a clear objective of the relevant policies. The proposal’s impacts run contrary to these aims, resulting in tangible harm to the area’s character and valued assets.

This conflict with the development plan framework is significant and cannot be overlooked. The proposal fails to align with the policies set out in the Argyll and Bute Local Development Plan 2 that are material to land-based effects, underscoring an inconsistency with the established planning framework. Furthermore, this discord extends to the National Planning Framework 4 when considered in its entirety, which the applicant has not successfully rebutted or mitigated through their submissions.

In conclusion, the proposal’s adverse effects and policy conflicts demonstrate that it is not supported by the terrestrial development plan framework. Given the clear and substantive nature of these inconsistencies, the proposal should be regarded as

contrary to the planning policies designed to protect the landscape, heritage, and community interests of Argyll and Bute. It follows that the proposal should be refused on these grounds.

1.1.919 Seascape, Landscape and Visual Effects

The visualisation materials submitted in support of the assessment inherently underestimate the true extent of visual impact experienced on site. NatureScot's visualisation guidance, which the applicant follows, explicitly acknowledges that printed visualisations cannot fully replicate the scale perceived by a viewer in the field. Furthermore, the wireline drawings included within the same panoramic projections share the limitations of the accompanying photography; they function merely as technical renderings within the visualisation rather than serving as independent corrections to these inherent shortcomings. Consequently, reliance on such materials must be tempered by an understanding of their technical and perceptual constraints.

The introduction of aviation and navigation lighting associated with the proposed development would permanently alter the night-time character of the currently unlit sea horizon for the entire 35-year operational period. This change is not merely a temporary effect limited to the lifespan of the development; rather, consenting to this proposal effectively acknowledges that the seascape is appropriate for wind farm use, with all attendant visual and environmental implications. Such a decision sets a precedent for the acceptability of lighting impacts in this sensitive seascape, fundamentally changing its character in a manner that should be carefully weighed against relevant policy considerations.

The proposal's acknowledged effects engage multiple key planning policies, specifically NPF4 Policies 4(c) and 4(d), 11(d) and 11(e), as well as GEN 7 and paragraph 4.28 of the National Marine Plan. Despite this, the applicant has failed to demonstrate that its conclusions regarding the scale of these effects align with its own established methodology. Moreover, there is no clear evidence that the proposal complies with policies designed to protect nationally important landscapes and seascapes. In light of this, it is evident that the proposal does not meet the necessary policy requirements safeguarding these valued environmental interests.

1.1.920 Cultural Landscape, Archaeology and Historic Environment

The heritage impact conclusions presented rely fundamentally on the underlying landscape assessment, which has been demonstrated to understate the extent of landscape effects. This understatement is critical because it directly influences the accuracy and reliability of the heritage conclusions drawn. As established in the evidence, any minimisation of landscape impact effectively transfers to the heritage assessment, thereby diminishing the perceived significance of potential adverse effects on heritage assets. In this way, the quantified impact of landscape changes is not fully accounted for, leading to a systemic underestimation within the heritage evaluation.

This reliance on an incomplete landscape assessment undermines the credibility of the overall heritage impact conclusions. When the foundational landscape effects are

understated, the subsequent heritage analysis cannot be regarded as robust or comprehensive. It is essential that the heritage assessment reflects the true scale and nature of landscape changes to adequately safeguard heritage interests. Without addressing these deficiencies, the conclusions remain compromised, and the potential harm to heritage assets may be insufficiently recognised or mitigated.

The application fails to comply with essential policy requirements concerning the protection of heritage assets. Specifically, it does not satisfy the provisions set out in National Planning Framework 4 (NPF4), including Policy 7(h) relating to scheduled monuments, Policies 7(c) and 7(d) regarding setting, as well as GEN 6 and paragraphs 4.22 to 4.23 of the National Marine Plan. These policies collectively establish a clear framework for safeguarding the cultural significance of heritage sites.

Moreover, the applicant has not provided the necessary demonstration that the cultural significance of internationally and nationally important heritage assets and their settings will be preserved. Without such evidence, Scottish Ministers lack the assessment required to conclude that the development would not adversely affect these assets. This omission represents a fundamental gap in the application's evidence base.

In conclusion, due to the failure to meet key policy obligations for heritage protection and the absence of a comprehensive assessment, the proposal cannot be considered acceptable. It is therefore recommended that the application be refused on the grounds of non-compliance with relevant heritage protection policies.

1.1.921 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 socio-economic assessment fails to provide an adequate understanding of the impacts on island communities, particularly when compared to the detailed evaluation of port communities. While the assessment recognises habitability as a potentially significant pathway affecting island communities, no subsequent place-based analysis of the islands' habitability was undertaken. Instead, Chapter 18 confines its detailed scrutiny to regional and port community impacts, ultimately concluding that island communities exhibit low sensitivity to tourism-related effects. This inconsistent approach undermines the robustness of the assessment and weakens any mitigation strategies proposed for these vulnerable communities.

Island economies are distinctive and cannot be accurately represented by regional averages. Their economic structure is heavily concentrated in sectors that are directly reliant on the attributes attracting visitors, making them inherently more sensitive to any changes affecting those qualities. Indeed, dependence on increasing visitor numbers intensifies, rather than diminishes, their vulnerability. Therefore, the applicant's conclusion of low sensitivity—arrived at without a proper place-specific analysis—is not supported by evidence but rests on an unfounded assumption. This methodological shortcoming calls into question the validity of the socio-economic assessment and the adequacy of proposed mitigations for the island communities concerned.

The proposal fails to comply with the necessary planning policies and statutory duties relating to island communities. Specifically, it neglects the requirements set out in GEN 19 and paragraph 4.81 of the National Marine Plan, which mandate that decisions be founded on robust socio-economic evidence and adopt a precautionary approach when such evidence is insufficient. Additionally, it does not adhere to NPF4 Policy 11(c) and the Islands (Scotland) Act 2018, both of which require that the interests of island communities be thoroughly assessed and appropriately weighted through meaningful engagement from the outset to the conclusion of the planning process.

Crucially, the applicant acknowledged that island communities warrant particular scrutiny but failed to undertake the necessary assessment to understand the potential effects of the proposal on these communities. This omission represents a significant shortcoming in demonstrating that the development is compatible with the sustainability of island communities. The absence of this critical evaluation undermines confidence that the statutory duties owed to these communities have been fulfilled.

In conclusion, given the lack of adequate assessment and meaningful engagement with island communities as required by relevant policies and statutory frameworks, the proposal does not meet established planning and legal standards. Therefore, it cannot be considered compliant with the requirements designed to protect and support sustainable island communities.

1.1.922 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.

Because the baseline assessments for landscape, heritage, and socio-economic factors are understated, the cumulative impact assessment that relies on these foundations consequently underestimates the true combined effects. This means that the practical consequence of the cumulative assessment is that it does not fully capture the extent of harm when this proposal is considered alongside existing, consented, and foreseeable developments.

The cumulative assessment depends entirely on the conclusions drawn elsewhere in the Environmental Impact Assessment. If those individual assessments start from a diminished baseline, then the aggregated effects presented cannot be relied upon as accurate. Therefore, the cumulative impact evaluation lacks robustness and fails to provide a reliable basis for decision-making regarding the proposal's wider environmental and social consequences.

The assessment identifies a clear failure to comply with established policy and regulatory requirements concerning project splitting and the evaluation of cumulative effects. Specifically, the applicant has not satisfactorily demonstrated that the cumulative and in-combination impacts of the proposal, nor the effects of the project in its entirety, have been reliably identified and assessed. This shortfall engages provisions 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 and the Environmental Impact Assessment Regulations.

This omission is significant because it undermines the integrity of the environmental assessment process and the policy framework designed to ensure comprehensive consideration of all relevant effects. Without a clear and thorough appraisal of deferred works and their potential interactions with the proposed development, the decision-making process is compromised. The absence of explicit treatment of these elements means that the proposal cannot be considered fully compliant with the requirements intended to prevent project splitting and to address cumulative effects adequately.

In light of these findings, it is essential that the determination explicitly addresses the treatment of deferred works and ensures a rigorous assessment of the project as a whole. Only through such comprehensive consideration can the planning authority fulfil its statutory obligations and uphold the principles of sustainable development enshrined in national policy and legislation. Consequently, the application should not be approved until these deficiencies are satisfactorily remedied.

1.1.923 Public Engagement, Site Selection and Environmental Information

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.

1.1.924 Effects on Local Area

The applicant's assessment notably lacks a comprehensive evaluation of the effects on Islay and Colonsay communities, particularly when compared to the mitigation measures proposed for other project locations. While the development area spans 448 square kilometres immediately north-west of Islay and west of Colonsay, the application treats Islay primarily as a potential project site rather than as an affected community in its own right. This approach overlooks the proximity of Atlantic-facing communities on Islay, which face the nearest edge of the development area without any detailed, place-based consideration of impacts on their setting, economy, or community life. In contrast, effective mitigation strategies would require such tailored assessments to address the direct and significant influences on local populations.

Moreover, the situation on Colonsay and Oronsay underscores further shortcomings in the assessment. Both islands' seaward outlook, integral to their daily life, directly faces the project array. The North Colonsay and Western Cliffs Special Protection Area, forming part of Colonsay's coastline, is central to the applicant's derogation case and compensation plan, implicitly acknowledging unavoidable harm to the internationally protected seabird population. Additionally, Oronsay Priory—a scheduled monument of national importance—lies within this community and suffers from an inadequate heritage assessment, particularly concerning the preservation of its open maritime setting. Taken together, these deficiencies undermine the reliability of the environmental and heritage impact evaluation and signal a need for a more robust, community-centred appraisal.

The applicant's assessment significantly underestimates the scale and impact of the proposed development on Iona, with practical consequences for the accuracy of the environmental and social impact evaluation. The Coastal Character assessment itself attributes a high sensitivity to the Sound of Iona, noting its direct orientation towards the development area, extensive visibility, and a large geographical extent of change. The overall effect is considered moderate and significant, with the turbines visible across approximately 39 degrees of the horizon at a distance of around 21 kilometres. Similarly, the West Coast of Iona is assessed as highly sensitive with widespread visibility, and the applicant concedes that significant effects would be experienced by residents and visitors throughout much of the island, including at Dùn Ì, the island's highest point. These findings demonstrate that

the visual impact is not only extensive but also of substantial significance to the community and visitors.

Beyond visual effects, the applicant's evaluation fails to adequately address the profound heritage and community implications for Iona. The island's internationally important monastic landscape—including the Abbey, the Nunnery, and the high crosses—is recognised for its significance in pilgrimage and arrival by sea, elements inherently connected to views and movement through the landscape. Despite Historic Environment Scotland's request for additional visualisations, including from the ferry crossing, no visualisation has been provided from key vantage points such as the raised ground above St Columba's Bay at Càrn Cùl ri Èirinn. Furthermore, a household consultation revealed that 92 per cent of respondents on Iona object to the proposal, yet the potential effect on habitability—a pathway acknowledged by the applicant's own consultants—was never assessed. The scale of the turbines relative to familiar landmarks also underscores the visual dominance; for instance, Ben Hynish on Tiree, which stands at 141 metres and is visible from Iona at approximately 33 kilometres, would be overtopped by the largest turbines by about 194 metres at roughly two-thirds of that distance. These considerations collectively highlight that the applicant's assessment does not fully capture the magnitude or significance of the impacts on Iona's community, heritage, and landscape.

The applicant's assessment 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 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 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.

There remains considerable uncertainty regarding the full extent of the proposed development's effects on mainland and island communities that maintain direct visual and economic connections to the seascape. Notably, Gigha—a community-owned island whose purchase by its residents has become emblematic of island

regeneration—faces the development waters from the east, yet the applicant's assessment fails to examine the potential impacts on its delicate community balance and economy. This omission is significant given Gigha's unique status and the potential sensitivity of its social and economic fabric to changes in seascape character and perception.

Similarly, Ardnamurchan Point, the westernmost tip of the British mainland, commands 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 applied, raising questions about whether the true visual and economic consequences for this area have been adequately considered. Furthermore, the chain of communities along the west coast of Kintyre, whose identity and visitor economies are closely tied to the open Atlantic seaboard views towards Islay, Jura, and surrounding waters, share a comparable vulnerability. The Treshnish Isles and other small islands and mainland coasts overlooking the development site are in the same position. Taken together, these unassessed effects cast doubt on the comprehensiveness of the applicant's evaluation and suggest that the potential harm to these interconnected communities has not been fully addressed.

1.1.925 Personal Observations

Finally, I would also ask the Scottish Ministers to consider: For a government that needs to inspire the people of Scotland to believe in the benefits of an independent Scotland, that needs to exercise control over the risks, costs and benefits in the longer term for the well being of our country, this is guaranteed to work in the opposite direction. Proposals like this sap the confidence of communities in the democratic process, and the belief that people can be genuinely heard. And finally, proposals like this exacerbate the already intolerable position of our natural wealth and advantages being spirited away to overseas shareholders rather than the people of Scotland.

1.1.926 Summary

The proposal for the MachairWind Offshore Wind Farm fails to satisfy the statutory and policy requirements governing its determination. The applicant's own assessment acknowledges substantial impacts on nationally designated landscapes, as well as on the coastal communities and heritage. However, independent evaluations of the submitted documents reveal that these impacts have been understated. Notably, the necessary heritage assessment has not been completed, and while effects upon the island communities were identified, no formal assessment of these impacts has been undertaken. In addition, the ecological safeguards required by law have not been demonstrated as achievable. It is also pertinent that only a portion of the project is currently subject to consideration by the Scottish Ministers.

Given these deficiencies, it is respectfully submitted that consent for the MachairWind Offshore Wind Farm should be refused, alongside the associated marine licence. Should the Ministers consider otherwise, it is requested that they require the submission of further environmental information and enhanced

visualisations. Moreover, the determination of the applications ought to be deferred until after a public inquiry, thereby ensuring that the concerns raised in this objection receive thorough examination. Regardless of the outcome, it is further asked that the Ministers provide explicit conclusions within their decision that address the effects upon cultural heritage and the affected island communities.

Yours faithfully,

[Redacted]

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