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# Representations - Statutory Consultees

Argyll and Bute Council

Argyll and Bute Council
Comhairle Earra Ghàidheal agus Bhóid

**Development and Economic Growth**
Director: [Redacted]

Helensburgh and Lomond Civic Centre, 38East Clyde Street, Helensburgh G84 7PG
Tel: 01546-605-552

16 September 2026

Our Ref: 26/01100/S36
Your Ref: MD-00012385 / MD-00012386

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By E-Mail to Marine Directorate MD.MarineRenewables@gov.scot

FAO : [Redacted]

Dear Marine Directorate

**Electricity Act Section 36 consultation response of Argyll and Bute Council relevant to the proposed construction and operation of the proposed Machair Offshore Wind Farm.**

**Applicant**: The Scottish Government on behalf of Scottish Power Renewables/MachairWind Limited

**Proposal**: A project design envelope approach comprises 91 335m blade tip height turbines or 144 280m blade tip height turbines above lowest astronomical tide within the Wind Development Area (WDA), offshore substation platforms, inter-array cabling, and associated infrastructure. The turbines will have a combined rated capacity of approx. 2GW.

**Site Address**: 15km northwest of Islay and 12.4 west of Colonsay within the W1 Plan Option Area with a total area of 448 km2

I write to inform you that Argyll and Bute Council Planning Protective Services and Licensing Committee considered the above proposal at its meeting on 15.9.26. The Committee agreed with the officer recommendation[1] that in response to the Section 36 Consultation, Argyl and Bute Council:

**(1)** Raise an **objection** to the proposal on **seascape and landscape visual impact grounds,** as the proposed offshore wind farm would result in extensive significant adverse seascape, landscape and visual effects at national, regional and local levels contrary to Policy GEN 7 of the National Marine Plan, Policy 11 and Policy 4 of the National Planning Framework 4 and Policy 30, 70 and 71 of the Argyll and Bute Local Development Plan 2.

**(2)** Raise an **objection** to the proposal on **cultural heritage impact grounds,** as the proposed offshore wind farm would result in significant effects on the setting of terrestrial heritage assets and on the setting of Iona conservation area, contrary to the provisions

[1] (Reference: Report by Head of Development and Economic Growth dated 3 September 2026 and supplementary report 1 dated 14 September 2026, enclosed)

of Policy GEN 6 of the National Marine Plan, Policy 7 of the National Planning Framework 4 and Policy 16, 17 and 19 of the Argyll and Bute Local Development Plan 2.

**(3)** Raise an Objection in relation to the **principle of the development** of the proposed offshore windfarm at the proposed location and, as a consequence of its location, scale and nature, its likely significant adverse effects on seascape, landscape, and visual amenity, and on the unique cultural heritage assets of the planning authority area. These significant adverse effects are such that they are considered to outweigh any positive contribution to renewable energy generation and climate change targets.

**(4)** Note to Scottish Ministers that Argyll and Bute Council considers that the significance of effect of this proposal on both seascape landscape and visual impact and on cultural heritage grounds is so great that the proposed development would **fail to meet provisions within The Electricity Act 1989**, which require Scottish Ministers, in considering proposals for consent, to have regard to the desirability of preserving natural beauty of the countryside, and of protecting sites, buildings and objects of architectural, historic or archaeological interest, and to do what can reasonably be done to mitigate any such effects.

**(5)** Raise strong concerns about the adequacy of the EIA Report, in relation to the assessment of the significant negative environmental effects of the project as a whole, and specifically in relation to underassessment of the significance of seascape landscape and visual impacts, cultural heritage impacts and a lack of assessment of the full range of socio-economic and tourism and recreation impacts on the fragile local communities most impacted.

**(6)** Raise concerns about the prematurity of determining this application in the absence of further information being submitted to address identified inadequacies and in advance of any of the proposed statutory mitigation and compensation programmes being implemented.

I therefore confirm that Argyll and Bute Council object to the current proposals on the basis of the determination set out above and provide further commentary on procedural matters. This objection has been submitted in accordance with agreed timescales. A copy of the minutes of the PPSL meeting will be provided when available.

I attach the following documentation in respect of the above for your reference;

- Appendix A - The Officer Report to Committee
- Appendix B – The Supplementary Officer Report to Committee
- Appendix C – Landscape Consultant Advice

Please do not hesitate to contact me further should you have any questions in respect of the above.

Yours faithfully

**[Redacted]**

Senior Planning Officer
Major Applications Team
Argyll and Bute Council

**This report is a recommended response to the Scottish Government's Marine Directorate (MD-LOT) Section 36 Consultation on the proposed Machair Offshore Wind Farm.**

| | |
|---|---|
| **Reference No:** | 26/01100/S36/ MD-00012385 / MD-00012386 |
| **Applicant:** | Scottish Power Renewables/MachairWind Limited |
| **Proposal:** | A project design envelope approach comprises 91 335m blade tip height turbines or 144 280m blade tip height turbines above lowest astronomical tide within the Wind Development Area (WDA), offshore substation platforms, inter-array cabling, and associated infrastructure. The turbines will have a combined rated capacity of approx. 2GW. |
| **Site Address:** | 15km northwest of Islay and 12.4 west of Colonsay within the W1 Plan Option Area with a total area of 448 km2 (central latitude and longitude co-ordinates: 56°01.520'N 006°40.880'W (WGS84)). |

## (A) THE APPLICATION

**The following consents are being sought from Scottish Ministers for the WDA:**

- Consent under Section 36 of the Electricity Act 1989;
- Two Marine Licences (for generation and transmission infrastructure assets and related activities) under the Marine (Scotland) Act 2010; and
- A declaration under Section 36A of the Electricity Act 1989 is being made with respect to proposed generating infrastructure within the WDA and would come into effect when any approval is given by the Scottish Ministers to the Development Specification and Layout Plan covering the WDA.

**The Section 36 Application comprises the following key offshore components within the WDA:**

- Up to 91 of the tallest 335m blade tip height WGT or up to 144 of the smaller 280m blade tip height WGT and their associated fixed-bottom foundations;
- Up to 2 Offshore SubStation Platforms (OSPs) and their associated fixed-bottom foundations;
- Scour protection around foundations;
- Offshore cables comprising:
  - Offshore export cables (linking the OSPs to the landfall);
  - OSP link cables (linking OSPs together); and
  - Inter Array Cables (IACs) (linking the WTGs together and to the OSP(s)).
- External cable protection on offshore cables as required; and
- Fibre optic communications cables integrated or bundled with the offshore cables.

**Connection to Electricity Grid** – the Offshore export cable corridor (ECC) is at an early stage of development. However, the portion of cables that will be located wholly within the WDA has been assessed on a 'worst case scenario' basis. This comprises up to four HVDC offshore export cables with a power voltage up to 525 kV with an indicative external cable diameter of up to 160 mm and a total length of 50 km per cable (200 km in total for up to four cables). Fibre optic cores will be included in the cables to transmit data to the Onshore

Transmission Development Area. Up to two offshore export cables would be bundled together in a single trench. This has been defined assuming an OSP location in the northeast of the WDA which results in the greatest distance to the proposed landfall location near Girvan, South Ayrshire.

The entirety of the OSP link cables will be sited within the WDA. Separate marine licences to construct, alter or improve the cables and generation infrastructure have been applied for alongside this S36 application. If two OSPs are required, up to four OSP link cables would connect OSPs to each other. The OSP link cable voltage would be up to 525 kV, with an indicative external cable diameter of up to 275 mm. They would also be integrated with fibre optic cables.

The generation capacity of the wind turbines will be around 2GW. Permission is sought to operate the proposal for a period of 35 years. The earliest any construction works at the WDA would start is assumed to be in 2030. It is anticipated that the maximum offshore construction period would be five years (excluding pre-construction activities such as surveys). The time periods of specific activities would vary and be encompassed within this five-year offshore construction period.

**Project Design Envelope -** The Project Design Envelope or 'Rochdale Envelope' is an approach that allows for the definition of appropriate design parameters to inform assessment where details of a proposal have not yet been confirmed. The applicant has defined a range of design parameters relating to the location, design and size of the Offshore Project, taking into account the guidance provided by Scottish Government, industry knowledge, site specific survey information and environmental conditions of the area. The final design of the Offshore Project would be required to fall within this Envelope and would be controlled through appropriate conditions that would be attached to the s.36 Consent and Marine Licences.

The Project has an existing grid connection date of September 2033; however, this may be delayed to 2035 or 2038 depending on the energisation of the separate Western Link 2 project being developed by Transmission Owners, National Grid Electricity Transmission and ScottishPower Transmission and due to the required development of complex and novel HVDC technology and the constraints of global HVDC supply chains. An extended consent validity period of eight years is requested to accommodate external programme adjustments.

## (B) RECOMMENDATION:

Following examination of relevant parts of the EIA Report and supporting documents and having regard to the consultation responses and advice received (as detailed in Section 'C' of this Report of Handling) it is recommended that Argyll and Bute Council:

**(1)** Raises an **objection** to the proposal on **seascape and landscape visual impact grounds,** as the proposed offshore wind farm would result in extensive significant adverse seascape, landscape and visual effects at national, regional and local levels contrary to Policy GEN 7 of the National Marine Plan, Policy 11 and Policy 4 of the National Planning Framework 4 and Policy 30, 70 and 71 of the Argyll and Bute Local Development Plan 2.

**(2)** Raises an **objection** to the proposal on **cultural heritage impact grounds,** as the proposed offshore wind farm would result in significant effects on the setting of terrestrial heritage assets and on the setting of Iona conservation area,

contrary to the provisions of Policy GEN 6 of the National Marine Plan, Policy 7 of the National Planning Framework 4 and Policy 16, 17 and 19 of the Argyll and Bute Local Development Plan 2.

**(3)** Raises an Objection in relation to the **principle of the development** of the proposed offshore windfarm at the proposed location and, as a consequence of its location, scale and nature, its likely significant adverse effects on seascape, landscape, and visual amenity, and on the unique cultural heritage assets of the planning authority area. These significant adverse effects are such that they are considered to outweigh any positive contribution to renewable energy generation and climate change targets.

**(4)** Notes to Scottish Ministers that Argyll and Bute Council considers that the significance of effect of this proposal on both seascape landscape and visual impact and on cultural heritage grounds is so great that the proposed development would **fail to meet provisions within The Electricity Act 1989**, which require Scottish Ministers, in considering proposals for consent, to have regard to the desirability of preserving natural beauty of the countryside, and of protecting sites, buildings and objects of architectural, historic or archaeological interest, and to do what can reasonably be done to mitigate any such effects.

**(5)** Raises strong concerns about the adequacy of the EIA Report, in relation to the assessment of the significant negative environmental effects of the project as a whole, and specifically in relation to underassessment of the significance of seascape landscape and visual impacts, cultural heritage impacts and a lack of assessment of the full range of socio-economic and tourism and recreation impacts on the fragile local communities most impacted.

**(6)** Raises concerns about the prematurity of determining this application in the absence of further information being submitted to address identified inadequacies and in advance of any of the proposed statutory mitigation and compensation programmes being implemented.

## (C) CONSULTATIONS

Scottish Ministers have consulted a range of stakeholders including NatureScot, SEPA, Historic Environment Scotland and other relevant authorities or stakeholders on the EIA Report. The consultation responses will address matters within their respective interests and areas of expertise e.g. habitats and species, ornithology, marine ecology and aviation, among others. At the time of writing, the views of other statutory consultees and contributors have not been formally published on the Marine Directorate website.

### Argyll and Bute Council Consultee Responses

The Council has consulted all relevant Community Councils and where responses have been received, these are available in full on the Council's public access system. A summary of responses is set out below:

**Tiree Community Council (Summary of response dated 25.8.2026): Objection** on landscape and visual impact grounds; dark sky degradation; historical and cultural impacts (particularly in relation to the Skerryvore Lighthouse); economic impacts on the tourism economy whereby any reduction in the area's attractiveness, or the perception that its unique landscapes have become industrialised, risks having direct economic consequences for businesses, employment and investment across fragile island communities. Concerns also raised on the potential impact on Tiree's nationally important Corncrake population which has not been assessed within the submitted EIAR and the lack of formalised community benefit as the island is not designated a 'host community'.

The response concludes: *"the overwhelming majority of opinion on MachairWind Offshore Wind Farm submitted to Tiree Community Council is strongly against the proposal."*

**Mull Community Council (Summary of response dated 18.8.2026) Objection** Raises concerns with issues of compliance with the National Marine Plan, NPF4 Policy 4(a) and 7 and noting that a formal Island Communities Impact Assessment (ICIA) should be carried out in line with The Islands (Scotland) Act 2018. Objections raised include:

- The development would unacceptably industrialise iconic views around Mull, Iona and surrounding waters including the designated Loch na Keal National Scenic Area which includes the Tresnish Isles, Staffa and Ulva. The use of a 20km distance from the WDA as the point in reduction of harm given Mull and Iona are 21km from the proposal.
- Tourism is the largest sector of the local economy and there are concerns about impacts on nationally and internationally important destinations.
- Inadequate Environmental Impact Assessment on affected communities including those on the Ross of Mull and Iona, although some respondents noted that the impact is overstated and visitors will not be put off by the turbines.
- Impacts of construction noise on marine mammals and cetaceans and associated impacts on tourism directly linked to whale watching etc
- The absence of assessment of corncrake impacts and their migration route through the proposed WDA in the EIA in addition to concern about the Guillemot Special Protection Area and other seabird species.
- Long-term impacts on Marine ecosystems from construction works.
- Impacts on dark skies due to turbine aviation lighting.
- Lack of meaningful community benefits to outweigh the risks to the economy and an imbalance between local impacts and corporate profits, which would largely benefit overseas corporate owners. Some supporters thought benefits could be realised through community energy initiatives.
- The current distribution network is incapable of coping with all the electricity currently produced in Scotland and many respondents were angered by the 'constraints payments' given to windfarm operators to switch off turbines.
- Inadequate community as consultation events were held on the Ross of Mull
- Criticism that throughout the consultation the project was framed as 'inevitable'.

**Gigha Community Council (Summary of response dated 25.8.2026):** Raises an **Objection** primarily on the basis of 'need' and strongly disputes the presumption of

unlimited renewables expansion in Scotland to seek to allegedly meet commitments made under the 2015 Paris agreement. Renewables development is being driven by supply side interests to provide for expanding electricity demand, not in making reductions of energy consumption through equivalent demand management proposals.

Supply side developments aim to increase energy usage, not balance supply and demand at net zero to comply with Paris agreement commitments. This is not how net zero accounting, as developed by Professor Myles Allen for IPCC almost twenty years ago, is intended to work.

The planning system that aims to balance all elements of resource consumption is not in place. Note that data centres compromise Paris targets for Net Zero.

Machair very clearly represents considerable over development of inshore marine wind. There are NO national benefits when Scotland already produces 180%+ of its own consumption and can supply reasonable growth in demand within the country without continued expansion into new pristine rural areas and inshore marine sites in sensitive land and seascapes. The proposed interconnector, 150km across the Firth of Clyde to Ayrshire, via submarine cabling would take power very close to the central belt AI development strip, but also capable of further transmission south. It has little or no value whatsoever for current Scottish energy consumption, and unless there is massive AI/hyperscale computer centre development, no future market within Scotland either.

There are no statutory community benefits required for offshore wind farms in the UK. Unless there are binding formal community benefit contracts or mandatory profit-sharing formulas then neither this nor any other modified offshore projects should be considered for development. There are no proposals for any community benefit, and certainly no consideration of the £10m per annum that a 2.0GW project would generate if it were land based.

These are remote land and sea scapes, not urban fringes or adjacent, so are treasured for their intrinsic wilderness qualities, and for tourism, as well as being valuable marine habitats. The landscape, seascape and environmental settings of Argyll's Inner Hebrides are of global significance, as are specific cultural and geological sites. There are a considerable number of landscape, archaeological, historical and geological sites of national interest within the development area sight zone.

Concern about the very short timetable for consultation on the largest inshore marine windfarm in the UK within a highly sensitive land and seascape.

Endorse the actions of Colonsay, Mull and Iona Community Councils in pursuing a comprehensive impact assessment under Section 14(1) of the 2018 Act, namely that Argyll and Bute Council make an S14 request in respect of the Sectoral Marine Plan for Offshore Wind Energy to undertake a retrospective Communities Impact Assessment.

**Iona Community Council (Summary of detailed response dated 29.7.2026):** Raises an **objection** with the central issue that the EIA repeatedly attributes less significance to identified effects than the applicant’s own evidence requires, and that those reduced conclusions are carried forward into the cultural heritage assessment, the tourism and socio-economic assessment, and ultimately into the planning balance on which the Scottish Ministers are asked to determine these applications. The other grounds for objection are summarised as follows:

- Seascape, landscape and visual: The SLVIA repeatedly applies non-standard de facto distance thresholds which appear in neither GLVIA3, NatureScot guidance nor the applicant’s own written methodology, and which have the effect of suppressing

the magnitude — and therefore the planning weight — of effects on nationally important landscape and seascape receptors.

- Cultural landscape and heritage: Historic Environment Scotland has consistently advised that Iona must be understood as an interconnected cultural landscape. The applicant accepts the qualities that make Iona's setting culturally significant in its baseline assessment, but the operational assessment does not apply the accepted methodology for assessing whether the integrity of setting has been retained. Instead, it describes predicted visual changes before concluding that integrity has been adequately retained, without undertaking the assessment required to demonstrate that conclusion.

- Tourism, socio-economics and habitability: The applicant's own consultants acknowledge that *"There are potential impacts on habitability for island communities in particular."* Yet the assessment undertakes no place-based assessment of Iona or any other affected island community, other than Islay, which is considered separately because of its potential role as a direct project location. Without assessing those communities, the applicant cannot reliably conclude that tourism, community resilience, habitability and long-term island sustainability would not be adversely affected.

- Ecology and biodiversity: Priority Marine Features and Annex I habitats lie within the WDA. The applicant has submitted a Without Prejudice Derogation Case and a Without Prejudice Guillemot Compensation Plan directed at the guillemot of the North Colonsay and Western Cliffs SPA — documents prepared because, in the applicant's own words, the Ministers "may not reach the same conclusion" as the applicant on adverse effect. Consent may lawfully be granted only where no reasonable scientific doubt remains.

- Cumulative and in-combination effects: The application assesses the WDA alone, deferring the export cable corridor and onshore transmission works to later applications, such that whole-project effects cannot properly be evaluated at the point of decision.

- Adequacy of the EIA: Taken together, these recurring assessment approaches deprive the Scottish Ministers of the evidential basis required to determine the applications.

Raises concerns on the lack of meaningful consultation on the W1 Plan Option as it was not made clear that the consultation concerned the identification of a nationally significant offshore wind development area immediately adjacent to Iona, Staffa and the Treshnish Isles, or that decisions taken at that stage could shape the future of these internationally significant landscapes, island communities and surrounding seas. For Iona and for other affected island communities, this application is the first real opportunity to engage with the suitability of this location — by which stage the development area has long since been identified, leased, and advanced through years of project development and substantial financial investment.

This engages GEN 18 of the National Marine Plan directly. GEN 18 requires that engagement be "appropriate, proportionate and meaningful", that it be "undertaken as early as possible" in planning and consenting processes, and that "the views expressed should be a consideration in decision making". Two generically titled emails, issued after the consultation had opened and at the onset of a civil emergency [covid-19], did not meet that standard. The Community Council invites the Scottish Ministers to weigh that history when assessing the reliance the applicant places upon the site-selection process.

Iona Community Council requests that the Scottish Ministers REFUSE consent under section 36 of the Electricity Act 1989 and REFUSE the associated marine licence applications.

**Colonsay Community Council (Summary of response dated - 29.7.2026):** Colonsay measures roughly eight miles by three. It lies in the open Atlantic between Islay and Mull, with Oronsay joined to its southern end across the tidal sands of the Strand. The island is known, with good reason, as the Jewel of the Hebrides: golden beaches such as Kiloran Bay, high western cliffs, machair bright with wildflowers in summer, genuinely dark night skies, and a stillness that has all but vanished elsewhere. A small, close-knit permanent community lives here year round. Its economy rests almost entirely on visitors, and visitors come for one reason: the island's unspoilt character. Colonsay faces west. The clean Atlantic horizon beyond its beaches and cliffs is not scenery incidental to island life; it is the island's principal asset, economically and in every other sense.

The Community Council wishes to be clear at the outset about what this objection is, and what it is not. It is not opposition to offshore wind, and it is not a demand that these waters be left untouched. The community accepts, and has said throughout, that a wind farm off Colonsay's west coast could be acceptable if it were scaled to its setting. The principle is one of simple proportion: a development close to a stunning, scenic, pristine Atlantic inhabited coast must be modest, and a vast development must stand far away. The detailed **objection** is advanced on seven grounds:

1. The site was selected without consulting the islands most affected and in disregard of the statutory adviser's own design guidance;
2. The development would cause major and significant harm to Colonsay's coast which the applicant has identified but not mitigated;
3. It would irrevocably devastate the setting and sense of place of the listed scheduled monument, Oronsay Priory;
4. The socio-economic effects on the island have never been assessed - chapter (EIAR Chapter 18) contains no study of Colonsay: no investigation of its community, its economy, its demography, its visitor base or its businesses.
5. Construction noise as experienced on Colonsay has not been assessed;
6. Unresolved scientific doubt attaches to the protected seabird colony of Colonsay's own cliffs; and
7. Only part of the project has been put forward for assessment. The applicant's recorded reasons for splitting this project are grid connection uncertainty, the limited remaining shelf-life of its ornithological baseline data, and precedent for separate submissions. These are administrative and commercial conveniences, not environmental justifications, and the appeal to precedent is the very argument Raeshaw rejected.

Scotland's framework does not ask decision-makers to choose between the climate and everything else. NPF4 and the National Marine Plan pursue renewable energy and the protection of landscapes, heritage, biodiversity and communities together, and the balance to be struck is whether this proposal satisfies the framework that serves both ends. The Community Council repeats what it said in opening: it supports the energy transition, and the community it speaks for would accept a development in these waters built in proportion to them… the applicant has never quantified a smaller, more distant or reconfigured scheme.

The Community Council asks the Scottish Ministers to **refuse** the application for consent under section 36 of the Electricity Act 1989, and to refuse the associated marine licence applications. If the Ministers are not minded to refuse, the Community Council asks in the alternative that further environmental information be required from the applicant under the 2017 EIA Regulations before any determination is made addressing at least the following:

- a genuine appraisal of primary mitigation of the seascape and visual effects on Colonsay and Oronsay, including relocation of the array, or its eastern portion, further from the coast with floating foundations as the water deepens, and a reduction in turbine height and number.
- identification of the mitigation measure cited as M-47, or confirmation that the citation is an error.
- a representative visualisation from the Strand crossing towards Oronsay Priory.
- a place-based socio-economic and habitability assessment of Colonsay, founded on primary research conducted within the community itself.
- a construction noise assessment addressed to Colonsay's coastal communities.
- any further ecological information needed for the Ministers to discharge their duties under the Habitats Regulations.

*Officer note: Colonsay, Gigha, Mull and Iona Community Councils have requested in their responses that Argyll and Bute Council make a request under Section 14(1) of the 2018 Islands Act in respect of the Sectoral Marine Plan for Offshore Wind Energy to undertake a retrospective Communities Impact Assessment. It is noted that the Scottish Government published a Final Islands Communities Impact Assessment alongside the Sectoral Marine Plan in October 2020[1]. It is also noted that a draft Islands Communities Impact Assessment (ICIA) has been prepared in relation to the draft updated Sectoral Marine Plan[2] and a final ICIA is due to be published alongside the Updated SMP-OWE.*

*The Council does not therefore consider it necessary to request a retrospective Islands Communities Impact Assessment, although it is acknowledged that project-level impacts on island communities have not been fully assessed as part of the EIAR process.*

**Argyll and Bute Council's Consultant Landscape Architect (Summary of response dated - 31.8.2026):** Overall, the Landscape Character Assessment appears to be comprehensive and generally supported by the accompanying ZTV analysis, figures and visualisations. We agree with some of the conclusions presented. However, the SLVIA appears to underestimate effects on the LCTs:

- LCT 42 (Rocky Moorland – Argyll), specifically the area south of Loch Gorm and;
- LCT 35 (Rugged Mountains), specifically the Jura units.

We consider the extent of visibility and influence of the proposal on perceptual qualities such as wildness, remoteness and the relationship with the sea to result in a higher magnitude of impact and significance of effect than those presented in the assessment.

Overall, the Coastal Character Assessment appears to be comprehensive and generally supported by the accompanying ZTV analysis, figures and visualisations. Whilst we agree with some of the conclusions, the SLVIA appears to underestimate the significance of effects on the following CCAs:

- CCA 7 - Ross of Mull;
- CCA 15 - Loch Tarbert;

[1] sectoral-marine-plan-offshore-wind-energy-final-islands-communities-impact-assessment.pdf
[2] Island Communities Impact Assessment for draft updated Sectoral Marine Plan for Offshore Wind Energy Consultation

- CCA 18 – Sgairail and;
- CCA 20 – Ardnave Point to Rhinns Point.

The proposal would influence key characteristics of these CCAs associated with remoteness, wildness, openness and the relationship between the coastline and the sea and we consider that the extent of visibility, scale of the proposal and influence on defining characteristics would result in a higher magnitude of impact and significance of effect.

Overall, the assessment of effects on the NSAs appears comprehensive and generally supported by evidence. However, we consider that the magnitude of impact and significance of effects on several SLQs relating to remoteness, wildness, naturalness and the relationship between the landscape and sea has been underestimated in the SLVIA. We do not agree with the conclusion that the effects on 'the remaining NSA SLQs' presented in Appendix 16.2 would be 'no greater than minor and not significant'.

- For the Jura NSA (a medium magnitude of impact and **moderate** significance for the SLQ *An island close yet remote* and a high magnitude of impact and **major** significance for the SLQ *The distinctive Paps of Jura* would be appropriate.
- For Loch na Keal, Isle of Mull NSA, a medium magnitude of impact and a **moderate** significance would be more appropriate for the SLQs *A voyage from enclosed sea loch to the open Atlantic, Views of an island studded seascape, World famous Staffa and Fingal's Cave* and *A vast natural world, dwarfing human settlement*.
- For Scarba, Lunga and the Garvellachs NSA, a medium magnitude of impact and **moderate** significance would be appropriate for the SLQ *Uninhabited, Remote, Wild Islands*.

We generally agree with the assessment of effects on all the LLAs. **Significant** effects of up to **major** significance are predicted for North and West Islay (Coast) and Central, South and West Mull LLAs, and we consider these conclusions appropriate given the extent of visibility identified within the ZTV analysis and the influence of the proposal on the perceptual qualities of these landscapes. Effects on the Jura LLA are assessed as minor and not significant, which also appears reasonable given the distance of the proposal, the partial screening of Colonsay and limited extent of visibility identified within the assessment.

Visual

The SLVIA assesses 30 viewpoints spread across an area up to 60km from the WDA, with either **moderate** or **major significant** effects predicted at 16 of these. Significant visual effects are predicted across a wide area encompassing many of the islands of the Hebrides to the north, south and east of the WDA, at distances of up 39km from the development.

We consider that effects assessed at several of the viewpoints which were assessed in the SLVIA as not significant, should be considered as **significant**. These are Viewpoint 17: Oban - Colonsay Ferry, Viewpoint 24: Staffa, Viewpoint 27: Ben More, Mull, and Viewpoint 19: Hynish, Tyree. Although these locations lie a considerable distance from the WDA, the very large scale and spread of the proposal mean it would still significantly affect the visual amenity. In addition, we consider that visual effects experienced from Viewpoint 18: Scarab and 19: Cnoc Dhomhuill could, arguably, also be **significant** in clear weather conditions.

The review also considers that for seven viewpoints the significance of effect should be increased from **moderate** and **significant** to **major** and **significant** due to under-evaluation of either sensitivity or magnitude of effect. These include Viewpoint 9: Colonsay to Port Askaig Ferry, Viewpoint 10: Loch Tarbert, Jura, Viewpoint 11: Beinn an Oir, Jura, Viewpoint 15: Uragaig, Colonsay Viewpoint 16: Summit of Beinn nan Gudairean, Colonsay, Viewpoint 21: Mull – Iona Ferry and Viewpoint 22: Dun I, Iona.

We also consider that visual effects on residents of Iona, Colonsay and Islay have not been adequately assessed within the SLVIA. The assessment of visual effects experienced from settlements has been limited to include only settlements found within the A&B LDP despite much of the islands' population being in scattered communities. In addition, some viewpoints have been assessed without taking the high sensitivity of residents into account and viewpoints that are stated to represent residential receptors have not been located close to residential properties at Baile Mor and Sligneach on Iona, Kilchattan and Uragaig on Colonsay and Portnahaven on Islay.

The proposal's size and spread mean that it would significantly affect the visual amenity of over a very extensive area of some of the most valued and scenic seascapes in Scotland. The islands of Colonsay, Oronsay, Islay, Jura, Mull, Iona and Staffa are known for their unspoilt and beautiful scenery and many tourists come to experience their remote undeveloped character.

*Officer comment: please see the full response at Appendix C and commentary in the Appendix A: Committee Report, Section 4: Seascape, Landscape and Visual Impacts.*

**West of Scotland Archaeology Service (WOSAS) (28.8.2026)**: The proposed Machair Wind Farm will have no physical impact on terrestrial archaeological sites. However, the settings of many historic and archaeological sites would be adversely affected by the construction of the proposal under evaluation. Impacts on the settings of designated heritage assets, scheduled monuments and listed buildings which are of national significance were considered by the applicant in agreement with Historic Environment Scotland.

In my opinion the EIA has underplayed the adverse impacts on intangible elements of the setting of designated and important non-designated heritage assets. Their contribution to a wider understanding, appreciation and experience of heritage sites have not been adequately discussed.

**Local Biodiversity Officer (1.9.2026):** I note that discussions regarding ornithological features are ongoing with NatureScot and RSPB and I ask that these continue. There are a number of protected sites around the proposed windfarm that are designated for highly sensitive migrating birds. The impact of the proposed windfarm must be considered on these species. I note that all the Important Ornithological Features (IOFs) are classed as Red or Amber birds of conservation concern.

The cumulative effects of wind farms are having a negative impact on bird species. Therefore, as per NPF4 Policy 1 When considering all development proposals significant weight will be given to the global climate and nature crises, appropriate mitigation measures must be implemented to reduce potential impact of bird collision and displacement.

**Marine and Coastal Policy Officer (20.8.2026):** The Applicant's Environmental Impact Assessment Report (EIAR) and technical reports are welcomed. There are no objections from the Marine and Coastal Development Policy Officer perspective, but only in terms of the marine matters and questions that were previously raised at the EIAR scoping stage (09 January 2025), and satisfactorily answered in the EIAR chapters discussed below. Only summary comments are discussed for chapters; 7, 8, 9, 10, 12, 13, 17, and 21 of the EIAR. Please note that comments from Chapter 8 – Benthic Ecology, Chapter 9 – Fish (Including Basking Shark) and Shellfish, Chapter 10 - Marine Mammals and Leatherback Turtle, and Chapter 17 – Infrastructure and Other Marine Users are subject to NatureScot's recommendations. I also defer to NatureScot's response for further comments on the Applicant's Habitats Regulations Appraisal (HRA) screening report and Report to Inform Appropriate Assessment (RIAA) (Part 2 Marine Mammals).

The proposal must conform to all relevant National Planning Framework 4 (NPF4) policies, Scotland's National Marine Plan: A Single Framework for Managing Our Seas (NMP), all relevant and general policies of the Local Development Plan 2.

It is expected that the majority of environmental monitoring will be undertaken by the Applicant as part of pre-construction, construction, and post construction monitoring as part of the planning and licensing process. In terms of the Applicant's Habitats Regulations Appraisal (HRA) screening report and the potential Likely Significant Effects (LSEs) to marine mammals as a result of the development, I have no further comments to add since my previous scoping response (09 January 2025). I do however defer to NatureScot for their view and comments. I also defer to NatureScot for comments on the Report to Inform Appropriate Assessment (RIAA) (Part 2 Marine Mammals).

**Economic Development (19.8.2026):** Comments provided on port selection, use of population projections for the baseline of the Socioeconomic Impact Assessment. Question the definition of tourism impacts as 'low' and the focus of recreational sailing on Ireland. IT is noted that at this stage the impacts seem to be very general and we will not have a clear idea about how it might benefit or impact the area until they have confirmed the port locations and what it will mean for each of the sites. The Council's Economic Development team are keen to see as much local benefit as possible from the development, should it proceed.

**(D) HISTORY:**

**24/01899/SCRSCO** – Screening and scoping opinion for proposed Section 36 application for Machair Offshore Wind Farm – Opinion issued 03 Dec 2024.

**(E) PUBLICITY:**

As the Council is not the Determining Authority the Scottish Government's Marine Directorate oversees the Publicity of the application.

**Public Consultation –** the Applicant has undertaken a programme of community and stakeholder consultation to inform the EIA process and Project design. This is detailed in Chapter 6 of the submitted EIAR. The submitted Pre-Application Consultation (PAC) Report further details that two rounds of PAC were undertaken, comprising 12 in-person events and four webinar events across Islay, Jura, Colonsay, Ross of Mull and Iona. The first round of PAC was live for six weeks, from 26 May 2025 to 06 July 2025 (inclusive), and the second round of PAC was live for six weeks, from 20 October 2025 to 30 November 2025 (inclusive).

**(F) REPRESENTATIONS:**

The Council is a consultee and not the determining Authority for this S36 application. All representations are directed to the Scottish Government's Marine Directorate Licencing Operations Team (MD-LOT) and at the time of writing, these have not been published online. However, a local opposition group (Hebridean Horizon) claims that their 'ObjectNow' platform has been used to submit 4,819 individual objections to the proposals to MD-LOT. MD-LOT have subsequently confirmed to officers that they are currently processing over 5,000 objections to this proposal.

Despite not being the determining Authority, the Council has received 3 individual objections. The issues raised are summarised as follows:

- EIAR is inadequate as it fails to present a robust, legally compliant 'realistic worst-case scenario' under the Rochdale Envelope principle and violates section 2.4.3. of the Scottish Ministers Scoping Opinion by withholding critical structural, temporal and geological data. This results in a deeply deficient assessment of marine effects.
- Deficiencies in Substructure Specification, Piling Durations and Acoustic Impacts on Marine Mammals.
- Unsubstantiated geological assumptions and failure to quantify drilled spoil.
- EIAR fails to recognise the impacts on and the significance of Iona – a small, precious jewel of a place and the birthplace of Christianity in Scotland.
- Negative impacts on Scottish consumers electricity costs – the narrative that the proposal will power 2 million homes is misleading if data centre expansion continues in Scotland.
- Projects are being built to exploit the UK Contract's for Difference (CfD) subsidy framework which guarantees a fixed price per mwh to developers. If the market price falls below this threshold, consumers subsidise the difference through their energy bills. Vast amounts of wind power flooding the grid widens the subsidy gap and increases the costs to consumers.
- Expanding generation requires massive transmission upgrades to transport energy from Scotland to high demand areas in the south, and when the grid cannot cope the systems operator pays wind farms to shut down. In 2025 total grid balancing and constraint costs hit a record-breaking £1billion in Scotland, with nearly £343 million paid directly to wind farms to shut down.
- Scotland already generates more renewable energy than it consumes annually.
- Assessment of cultural heritage impacts and the harm caused by the proposal to the setting of heritage assets has been downplayed and the EIAR and has not been correctly assessed against Scottish Planning Policy context of NPF4 Policy 7, HES Guidance or caselaw (as it relies on English planning case law).
- The Cultural heritage assessment fails to fully assess the harm caused to the heritage assets of Iona (St Mary's Abbey, Iona Abbey and Iona Conservation Area), it's historical links to the seascape and to Ireland and their contribution to 'Western culture'.
- The EIAR should include an assessment of the whole of Iona and the Applicant's 'low adverse magnitude' is 'irrational'.

***Note: The comments raised above are addressed in the assessment of the proposal at Appendix A of this report, where relevant to the planning process.***

**(G) SUPPORTING INFORMATION**

**Has the application been the subject of:**

**(i) Environmental Impact Assessment Report (EIAR):** Yes

**<u>The EIAR (June 2026) comprises the following volumes:</u>**
**Non-Technical Summary**

**Volume 1: Introductory Chapters**
Chapter 1 Introduction
Chapter 2 Policy and Legislative Context
Chapter 3 Project Description
Chapter 4 Site Selection and Alternatives

Chapter 5 EIA Methodology
Chapter 6 Consultation and Stakeholder Engagement

**Volume 2: Technical Chapters**
Chapter 7 Marine Physical Environment;
Chapter 8 Benthic Ecology;
Chapter 9 Fish (Including Basking Shark) and Shellfish;
Chapter 10 Marine Mammals and Leatherback Turtle;
Chapter 11 Offshore Ornithology;
Chapter 12 Commercial Fisheries;
Chapter 13 Shipping and Navigation;
Chapter 14 Offshore Archaeology and Cultural Heritage;
Chapter 15 Military and Civil Aviation;
Chapter 16 Seascape, Landscape and Visual Impact Assessment;
Chapter 17 Infrastructure and Other Marine Users;
Chapter 18 Socio-economics;
Chapter 19 Greenhouse Gases Assessment;
Chapter 20 Climate Change Risk Assessment;
Chapter 21 Major Accidents and Disasters; and
Chapter 22 Inter-Related Effects and Ecosystem Assessment.

**Volume 3a: Technical Appendices Standalone**
Appendix 1 WDA Scoping Report
Appendix 2 WDA Scoping Opinion
Appendix 3 WDA Scoping Validation Report
Appendix 4 Gap Analysis
Appendix 5 WDA Mitigation and Commitments Register
Appendix 6 Outline Environmental Management Plan
Appendix 7 Marine Pollution Contingency Plan
Appendix 8 Invasive Non-Native Species Mitigation Plan Haskoning
Appendix 9 Draft Marine Mammal Mitigation Protocol
Appendix 10 Fisheries Mitigation, Monitoring and Communication Plan
Appendix 11 Offshore Written Scheme of Investigation and Protocol for Archaeological Discoveries
Appendix 12 Outline Lighting and Marking Plan
Appendix 13 Outline Vessel Management Plan and Navigational Safety Plan
Appendix 14 Carbon Management Plan
Appendix 15 Design Strategy Document

**Volume 3b Technical Appendices – Introductory Chapters**
Appendix 1.1 Competent Experts
Appendix 5.1 Cumulative Projects Long and Short Lists

**Volume 3c Technical Appendices – Technical Chapters**
Appendix 7.1 Marine Physical Environment Numerical Modelling (Haskoning)
Appendix 7.2 Marine Physical Environment - Stratification Analysis (Haskoning)
Appendix 7.3 Phase 1 Geophysical and Habitat Interpretative Report (Fugro)
Appendix 8.1 2025 Habitat Assessment Report (Sulmara and Benthic Solutions Ltd)Appendix 8.2 Benthic Characterisation Report (Fugro)
Appendix 8.3 Geophysical and Habitat Interpretive Report (Fugro)
Appendix 9.1 Fish (including Basking Shark) and Shellfish Baseline Technical Report (Haskoning)
Appendix 10.1 Underwater Noise Modelling Report (Subacoustech Environmental)
Appendix 10.2 Marine Mammal and Leatherback Turtle Baseline (Haskoning)

Appendix 10.3 Analysis of Hebridean Whale & Dolphin Trust Visual and Passive Acoustic Survey Data off Western Scotland (Scottish Association for Marine Science / Hebridean Whale and Dolphin Trust)
Appendix 10.4 Interim Population Consequences of Disturbance (IPCoD) Modelling Technical Report (Haskoning)
Appendix 10.5 Cumulative Effects Assessment (CEA) Screening (Haskoning)
Appendix 11.1 Overview of Offshore Ornithology EIA and HRA Documents (MacArthur Green part of SLR)
Appendix 11.2 Baseline Site Characterisation (MacArthur Green part of SLR)
Appendix 11.3 Collision Risk Modelling (MacArthur Green part of SLR)
Appendix 11.4 Displacement (MacArthur Green part of SLR)
Appendix 11.5 Cumulative and In-Combination Mortality Calculations (EIA and HRA) (MacArthur Green part of SLR)
Appendix 11.6 Apportioning for HRA (MacArthur Green part of SLR)
Appendix 11.7 Population Viability Analysis (MacArthur Green part of SLR)
Appendix 12.1 Commercial Fisheries Technical Report (Nima)
Appendix 13.1 Navigational Risk Assessment (Anatec)
Appendix 14.1 Archaeological Assessment of Geophysical and Hydrographic Data (Haskoning)
Appendix 14.2 Palaeolandscape Assessment (Haskoning)
Appendix 14.3 Settings Assessment (Haskoning)
Appendix 15.1 Airspace Analysis and Radar Modelling (Cyrrus)
Appendix 15.2 Dubh Artach Lighthouse Technical Note (Cyrrus)
Appendix 16.1 SLVIA and Visualisation Methodology (LUC)
Appendix 16.2 Assessment of Effects on Special Landscape Qualities LUC Appendix 16.3 Coastal Character Baseline and Assessment (LUC)
Appendix 16.4 SLVIA Visualisations (LUC)
Appendix 18.1 Socio-Economics Technical Report (Biggar Economics)
Appendix 19.1 Greenhouse Gas Assessment Methodology (Haskoning)
Appendix 19.2 Blue Carbon Assessment (Haskoning)
Appendix 20.1 Climate Projection Data (Haskoning)
Appendix 20.2 Climate Change Vulnerability Assessment

**In addition, the following documents are provided in support of the application:**

- Pre-Application Consultation (PAC) Report and PAC Appendices (Haskoning)
- Report to Inform Appropriate Assessment (RIAA) Part 1 Upfront Sections (Haskoning)
- Report to Inform Appropriate Assessment (RIAA) Part 2 Marine Mammals (Haskoning)
- Report to Inform Appropriate Assessment (RIAA) Part 3 Ornithology (MacArthur Green - part of SLR)
- Windfarm Development Area Habitats Regulations Appraisal Screening Report (Haskoning / MacArthur Green - part of SLR)
- Without Prejudice Derogation Case Haskoning Report to Inform Marine Protected Area Assessment (Haskoning)
- Planning Statement (Haskoning)
- Nature Positive Plan
- Socio-economic Action Plan (BiGGAR Economics)

**(ii) An Appropriate Assessment under the Conservation (Natural Habitats) Regulations 1994:** The Scottish Government's Marine Directorate, as the determining authority, are the competent authority for the Habitat Regulation Appraisal process for the Appropriate Assessment of potential impacts on European sites,

having regard to the comments of NatureScot and other specialist consultees in this respect.

The application was submitted with a Report to Inform Appropriate Assessment (RIAA) and a Windfarm Development Area Habitats Regulations Appraisal Screening Report. It is not considered by the applicant that any whole project contributions will lead to an Adverse Effect on Site Integrity (AEoSI) of European sites. However, as part of the submissions, a Derogation Case for the Offshore elements of the project has also been provided. This seeks to demonstrate the applicant's view that there are No Alternative Solutions to the proposal and Imperative Reasons of Overriding Public Interest (IROPI) that would be sufficient to enable the project to proceed, should it be considered by Scottish Ministers that the development would have adverse effects on the integrity of a European site(s) and its qualifying feature(s).

The Council does not comment on the RIAA element of the submissions or the potential effect of the proposal on European sites, protected species, habitats and ecology more widely given the Scottish Ministers will have available to them the expertise of NatureScot and in-house ecology specialists within Marine Directorate.

**(iii)** **A Design or Design/Access statement:** No

**(iv)** **Sustainability Checklists (with reference to the requirements of LDP2 Policy 04):** Not required proposal accompanied by full EIAR.

**(v)** **A report on the impact of the proposal e.g. Retail impact, transport impact, noise impact, flood risk, drainage impact etc:** All relevant reports are encompassed within the EIAR.

**(H) PLANNING OBLIGATIONS** **Is a Section 75 agreement required:** No

**(I) Has a Direction been issued by Scottish Ministers in terms of Regulation 30, 31 or 32:** No

**(J) Section 25 of the Act; Development Plan and any other material considerations over and above those listed above which have been considered in the assessment of the application**

**(i) List of all Development Plan Policy considerations considered in assessment of the application.**

**National Marine Plan (2015)**
GEN 1 General Planning Principle
GEN 2 Economic Benefit
GEN 3 Social Benefit
GEN 4 Co-existence
GEN 5 Climate Change
GEN 6 Historic environment
GEN 7 Landscape/Seascape

GEN 13 Noise
GEN 15 Planning alignment
GEN 17 Fairness
GEN 18 Engagement
GEN 19 Sound evidence
FISHERIES 1
FISHERIES 2
FISHERIES 3
WILD FISH 1
RENEWABLES 1
RENEWABLES 4
RENEWABLES 5
RENEWABLES 6
RENEWABLES 7
RENEWABLES 8
REC & TOURISM 2
REC & TOURISM 5
TRANSPORT 1
TRANSPORT 6
CABLES 1
CABLES 2
CABLES 3
CABLES 4

**National Planning Framework 4 (Adopted 13th February 2023)**

NPF4 Policy 1 – Tackling the Climate and Nature Crises
NPF4 Policy 2 – Climate mitigation and adaptation
NPF4 Policy 3 – Biodiversity
NPF4 Policy 4 – Natural Places
NPF4 Policy 7 – Historic Assets and Places
NPF4 Policy 11 – Energy
NPF4 Policy 14 – Design, quality and place
NPF4 Policy 23 – Health and safety
NPF4 Policy 25 – Community Wealth Building
NPF4 Policy 29 – Rural development

Annex B – National Statements of Need

**3 – Strategic Renewable Electricity Generation and Transmission Infrastructure, including:**

a) On and offshore electricity generation, including electricity storage, from renewables exceeding 50 megawatts capacity;
b) New and/or replacement upgraded on and offshore high voltage electricity transmission lines, cables and interconnectors of 132kv or more; and
c) New and/or upgraded infrastructure directly supporting on and offshore high voltage electricity lines, cables and interconnectors including converter stations, switching stations and substations.

**Argyll & Bute Local Development Plan 2 (LDP2) (Adopted 2024)**

Policy 04 – Sustainable Development
Policy 15 – Protection, Conservation and Enhancement of Our Historic Environment
Policy 16 – Listed Buildings

Policy 19 – Scheduled Monuments
Policy 20 – Gardens and Designed Landscapes
Policy 21 – Sites of Archaeological Importance
Policy 30 – The Sustainable Growth of Renewables
Policy 63 – Waste Related Development and Waste Management
Policy 70 – Development Impact on National Scenic Areas (NSA's)
Policy 71 – Development Impact on Local Landscape Areas (LLA's)
Policy 73 – Development Impact on Habitats, Species and Biodiversity
Policy 74 – Development Impact on Sites of International Importance
Policy 75 – Development Impact on Sites of Special Scientific Interest (SSSIs)
Policy 76 – Development Impact on Local Nature Conservation Sites (LNCS)
Policy 80 – Geodiversity

**(ii) List of all other relevant planning considerations considered in the assessment of the application, having due regard to Annex A of Circular 3/2013**

- Uk Marine Policy Statement (2011)
- Scottish Energy Strategy (2017)
- Offshore Wind Policy Statement 2020
- Sectoral Marine Plan for Offshore Wind Energy 2000
- British Energy Security Strategy (UK Government) 2022
- Draft Energy Strategy and Just Transition Plan (2023)
- Clean Power 2030 Action Plan (Uk Government) 2024
- UK Government's Clean Power 2030 Action Plan (2024)
- NMP2 Planning Position Statement (2024)
- Draft Updated Sectoral Marine Plan for Offshore Wind Energy (2025)
- Scottish Government Updated Offshore Wind Ambition (2026)
- Good Practice Principles for Shared Ownership of Renewable Energy Developments, Scottish Government, 2019
- ABC Technical Note – Biodiversity (Feb 2017)
- Landscape Institute and Institute of Environmental Management and Assessment – Guidelines for Landscape and Visual Impact Assessment, Third Edition (2013)
- Scottish Natural Heritage – Visual Representation of Wind Farms Guidance (Version 2.2, 2017)
- Scottish Natural Heritage - Siting and Designing Wind Farms in the Landscape Guidance (Version 3a, 2017)
- Historic Environment Policy for Scotland (2019)
- Scottish Government, Draft Planning Guidance: Biodiversity, 2023
- The Climate Change (Emissions Reduction Targets) (Scotland) Act 2024
- Managing Change in the Historic Environment
- PAN 60 – Planning for Natural Heritage (Jan 2008)
- Views of statutory and other consultees
- Legitimate public concern or support expressed on relevant planning matters

**(K) Is the proposal a Schedule 2 Development not requiring an EIAR:** No, an EIAR was required.

**(L) Has the application been the subject of statutory pre-application consultation (PAC):** In accordance with the Marine Licensing (PAC) (Scotland) Regulations 2013, the Project was required to undertake statutory PAC. This included a combination of public engagement and targeted consultation with statutory and non-

statutory stakeholders. Further detail is provided in Section 3.1.2 of the submitted PAC Report.

**(M) Does the Council have an interest in the site:** No

**(N) Requirement for a pre-determination hearing:** No

**(O) Is the proposal consistent with the Development Plan:** Due to identified extensive significant adverse seascape, landscape and visual impacts, significant cultural heritage impacts and insufficient detail on the proposed socioeconomic impacts on fragile island communities it is not considered that the proposal is consistent with relevant provisions of the Development Plan which comprises the National Marine Plan, National Planning Framework 4 or Local Development Plan 2.

**(P) Need for notification to Scottish Ministers or Historic Environment Scotland:** No

**Author of Report:** [Redacted] **Date:** 3 September 2026

**Reviewing Officer:** [Redacted] **Date:** 3 September 2026

[Redacted]
**Head of Development & Economic Growth**

## APPENDIX A – COMMITTEE REPORT REF: 26/01100/S36

## PLANNING AND POLICY ASSESSMENT

### 1. THE SECTION 36 CONSENTING REGIME FOR OFFSHORE WIND FARM DEVELOPMENT IN SCOTTISH WATERS

Legislative context

1.1 As the proposed infrastructure with the identified Wind Development Area for Machair Offshore Wind Farm represents an offshore generating station greater than 1 MW within the Scottish Marine Area, there is a requirement for consent under Section 36 of the Electricity Act 1989 which establishes the regulatory regime for the construction and operation of generation stations. Reforms enacted under the Planning and Infrastructure Act 2025 aim to modernise aspects of this regime, including measures to streamline the consenting process for nationally significant clean energy projects (UK Government, 2025). At the time of writing these some reforms have come into force but associated Regulations have not yet been published.

1.2 Section 36 consent is required to authorise the installation and operation and maintenance of the proposed wind turbine generators, and inter-array cables within the proposed wind development area. In Scotland, Section 36 consents for offshore projects are authorised by Scottish Ministers and administered by the Marine Directorate within the Scottish Government. The Council is a consultee in this process. Schedule 8 of the Act sets out requirements and procedures in relation to applications for Section 36 consents. Schedule 9 of the Electricity Act requires the Applicant and the decision maker to have regard to the preservation of amenity. It requires that in the formulation of proposals the developer:

*3 (1) 'In formulating any relevant proposals, a licence holder or a person authorised by an exemption to generate, distribute, supply or participate in the transmission of electricity:*

*a) shall have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and*

*b) shall do what he reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects'.*

1.3 The Marine Scotland Act 2010 established the marine planning framework in Scotland, in addition to establishing the requirement for a National Marine Plan (NMP) and Regional Marine Plans in Scottish waters. Scottish Ministers are responsible for granting Marine Licences in the Scottish Inshore region (0-12 nautical mile (nm)) (Scottish Government, 2010). The Applicant will apply for two Marine Licences in accordance with the Act as the entirety of the WDA is situated within the 12 nm boundary: One licence for generation assets, including wind turbine generators, IACs and OSP link cables; and; One licence for transmission assets, including OSPs, OSP link cables and WDA offshore export cable.

1.4 The proposal is subject to provisions within EU Directive 92/43/EEC, known as the 'Habitats Directive' and EU Directive 2009/147/EC, known as the 'Birds Directive' which was implemented to provide a framework for conservation and management of wild birds in the EU. Both sets of the Habitats Regulations require the Habitats Regulations Appraisal (HRA) process to be followed where a project could affect a designated site (SPAs, SACs, proposed or candidate SPAs and SACs or Ramsar Sites), either individually or in-combination with other plans or projects, in view of the site's conservation objectives.

1.5 The Climate Change (Scotland) Act 2009, amended by the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 and Climate Change (Emissions Reduction Targets) (Scotland) Act 2024 The Climate Change (Scotland) Act 2009 was implemented to reduce the Greenhouse Gas (GHG) emissions in Scotland. The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 (Sections 1-3) include Scotland's commitments to reducing GHG emissions (Scottish Government, 2019). In November 2024, the Climate Change (Emissions Reduction Targets) (Scotland) Act 2024 was introduced, which replaces the targets set out in Climate Change (Scotland) Act 2009 with a system of targets based on carbon budgets. However, the overall target of achieving net zero carbon emissions by 2045 remains in place.

Policy context

1.6 Planning Circular 1/2015 sets out the Relationship between the Statutory Land Use Planning System and Marine Planning and Licensing. Marine Scotland, on behalf of Scottish Ministers, has the primary responsibility for marine planning, conservation and licensing from Mean High Water Springs out to 200 nautical miles. Terrestrial planning authorities are responsible for all terrestrial planning matters down to Mean Low Water Springs and for marine fish farming (finfish and shellfish) where planning consent is required out to 12 nautical miles.

1.7 The National Marine Plan (NMP) 2015 and the National Planning Framework 4 2023 (NPF4) provide an aligned framework for marine planning at a national level. They support sustainable development both in the marine area and on land and provide complementary policy. The National Marine Plan supports national developments in the NPF to help to align marine and terrestrial plans. The Marine Sectoral Plan contains Scottish Ministers' spatial strategy to facilitate the sustainable development of commercial scale renewable energy projects by identifying the most suitable locations around Scotland for offshore renewable energy development. Sectoral marine plans are a material consideration in decision making.

1.8 The National Marine Plan provides the statutory framework and policies within which offshore renewable energy developments are progressed, both at the planning and licensing stages, with terrestrial development plans providing the framework for onshore elements. The National Marine Plan reflects the spatial strategy of the Sectoral Marine Plans, which identify locations for renewable energy projects. NPF4 designates certain types of projects as National Developments on the basis that they

are needed to implement the national spatial strategy. The proposed Machair Windfarm would be classed as a National Development under Annex B of NPF4.

Marine Licensing and Electricity Act Consenting

1.9 Where Section 36 consents are required, a statutory provision in the Growth and Infrastructure Act 2013 which amends Section 57 of the Town and Country Planning (Scotland) Act 1997, enables Scottish Ministers to direct that planning permission is deemed to be granted for the ancillary onshore components and related onshore infrastructure. This creates a single application process, consented by Scottish Ministers, and means that an applicant does not have to make separate applications for a marine licence and planning permission.

1.10 Under the Electricity Act 1989 terrestrial planning authorities are not statutory consultees on Section 36 applications for generating stations situated wholly offshore. However, where part of the infrastructure to be covered under the Section 36 consent is to be built onshore then under the Electricity Act the terrestrial planning authority is a statutory consultee on the application as a whole, including the offshore elements.

1.11 Terrestrial planning authorities are, in all cases, statutory consultees under environmental impact assessment processes relating to Section 36 applications. They are, as a matter of course, consulted on Section 36 applications in full, including for matters not related to environmental impact assessment, and on deemed planning permission for the onshore elements. Terrestrial planning authorities are fully consulted on any application for planning permission for the onshore components of an offshore generating station.

1.12 Assessment of the proposal against the relevant policies of the development plan, which includes the National Marine Plan, NPF4 and Argyll and Bute Local Development Plan 2 (LDP2) will ensure that proper consideration is given by the Council to the extent that the proposal satisfies the Schedule 9 duties highlighted above. The Council can either support or object and recommend conditions to be imposed if Scottish Ministers grant consent.

1.13 Previously, if the Council raised an objection to a section 37 or section 37 application, Scottish Ministers were obliged to hold a Public Local Inquiry (PLI) if they were minded to grant consent. On 30 January 2026 the Scottish Government published a letter to industry and planning authorities clarifying new processes around objections to applications for energy consent following the receiving of Royal Assent of the Planning and Infrastructure Act 2025 in December 2025. This letter clarifies that where a planning authority objects to an application and that objection is not withdrawn, or cannot be resolved by conditions or modifications, a new reporter led examination process will apply. These changes come into effect on 18th February 2026 and will be applicable from that date.

1.14 This report considers the relevant policy considerations, planning merits, views of consultees and representations. It recommends views to be conveyed to the Marine Directorate for consideration before a decision is made by Scottish Minsters. It should be noted that this report focuses on those policy areas of greatest relevance to the

development plan and where the Council has resources to properly assess the submitted material. On detailed technical matters where an expert response is expected to be provided to the Marine Directorate by a separate consultee (e.g. ornithology, marine wildlife, benthic matters, commercial navigation and shipping, commercial fishing and national level seascape and landscape and cultural heritage impacts) the Council has largely refrained from comment and would defer to comments submitted by expert authorities on these matters.

## 2. SITE CONTEXT AND DESIGN OF PROPOSAL

The Application Site

2.1 The applicant has entered into an 'Option to Lease Agreement' with Crown Estate Scotland for the entire W1 Plan Option Area as identified in the 2015 Scottish Government's Sectoral Marine Plan. The proposal is for a fixed-bottom Offshore Wind Farm within the W1 area with a potential capacity of 2GW (2000MW) within an identified Windfarm Development Area (WDA) of 448 km2 located off the western coasts of the Isles of Islay, Colonsay, Mull and Iona. The WDA is located at the following distances to the nearest point on each of these islands:

- 12.4 km west of Colonsay;
- 15 km northwest of Islay;
- 20 km southwest of Mull;
- 21 km southwest of Iona; and
- 30 km west of Jura.

2.2 The WDA is not located within any nationally or locally designated landscape. However, there is theoretical visibility that extends to several designated landscapes including the Jura National Scenic Area (NSA), Loch na Keal, Isle of Mull NSA, and Scarba, Lunga and the Garvellachs NSA, as well as Argyll and Bute Local Landscape Areas (LLAs) of North and West Islay (coast) LLA, Central, South and West Mull LLA and Jura LLA. Potential visibility from sections of the Ben More, Mull Wild Land Area (WLA) and Jura, Scarba, Lunga and the Garvellachs WLA has also been identified within the submitted SLVIA assessment.

2.3 Water depths within the WDA range from 21.6 m to 81.7 m below Lowest Astronomical Tide (LAT) and there are sandwaves and a sandbank located in the southwest of the WDA. There is a variety of geology and bedrock types across the WDA.

2.4 The proposed Machair Offshore Windfarm project has been divided into three Development Areas for consenting purposes:

- The WDA – the subject of this Section 36 planning application.
- The Offshore Export Cable Corridor (ECC); and
- The Onshore Transmission Development Area (OnTDA).

The submitted material notes that a grid connection location for the Project was confirmed in August 2025 to be in the vicinity of Girvan, South Ayrshire and that separate consent / marine licence applications will be sought for both the Offshore ECC and OnTDA elements of the project. It is anticipated that the Project will connect to a new High Voltage Direct Current (HVDC) switching station to be built by the Transmission System Operator near the Girvan OnTDA.

In terms of the approach to the EIAR, the applicant used a set of assumptions to inform a combined assessment which will enable potential interactions and additive effects between each Development Area to be identified and assessed. Please see Section 7 of this Report for further commentary relating to current case law and the requirements for applicants to take a 'whole project' approach to large infrastructure projects where separate applications may be required.

Description of development

2.5 The submitted Environmental Impact Assessment (EIA) utilises a project design envelope approach which includes the following parameters within the identified WDA (which is the subject of this Section 36 application):

- Up to 91 of the largest (335 m blade tip height with a minimum blade tip clearance ('Air Gap') (m HAT) of 28.4m) and associated foundations; or
- Up to 144 of the smallest (280 m blade tip height with a minimum blade tip clearance ('Air Gap') (m HAT) of 28.4m) WTGs and associated foundations.
- Up to 2 Offshore substation platforms (OSP).
- Interarray cables (IAC)
- Up to 4 x 50km offshore export cables (ECC).

The final WTG layout will be finalised following completion of detailed pre-construction wind resource studies, site investigations and the selection of the preferred WTGs and their foundations. Foundations being considered are monopile foundations, Jacket on Pin Pile or Jacket on suction buckets. The final turbine layout will be selected from within the consented parameters to optimise energy output and the foundation installation process, accounting for water depths, ground conditions, internal wake effects and any other constraints including having regard to both the overall project objectives and landscape design objectives for the WDA.

2.6 Inter-array cables from each string of WTGs will be brought to an Offshore Substation Platform (OSP). At an OSP, the generated power will be transformed to a High Voltage Direct Current (HVDC) of voltage up to ±525kV. The basic OSP design will consist of a topside structure configured in a multiple deck arrangement, with the decks either open with modular equipment, or fully clad. Weather sensitive equipment would be housed accordingly.

2.7 The location of the OSP(s) will also be confirmed during the detailed design process post consent, accounting for the WTG layout and to optimise the inter-array cables, OSP link and export cable lengths, but will be within the WDA and not located on the perimeter of the WTG/OSP layout.

Construction Phase

2.8 A 5-year WDA construction period is anticipated and the earliest that WDA construction could commence is 2030, with the onshore construction works likely to commence first. As the Project will only utilise bottom-fixed foundations, all WTGs will be assembled on site and will not be towed from shore, fully assembled. A total of 5,699 vessel movements (round trips) is estimated during construction on a worst-case basis. The maximum number of all types of vessels operating within the WDA at any one time during construction is 117. A safety zone of 500m is also proposed around the

construction areas with other regulatory buffers proposed at various stages of the construction and operation.

Operation and maintenance

2.9 Operational control of the Project would be through a SCADA system, which would connect each WTG to the onshore control room. This system would enable the remote control of individual WTG, as well as remote interrogation, information transfer and data storage. A programme of monitoring and scheduled maintenance would be undertaken through the lifetime of the Project to ensure that all offshore infrastructure is maintained in safe working order and to maximise operational efficiency. The overall operation and maintenance strategy will be finalised once the operation and maintenance base location and technical specifications are known.

2.10 A number of vessel and helicopter trips would be required each year to allow for scheduled and unscheduled maintenance activities. These are estimated to total 576 helicopter and 432 vessel annual round trips per year once the wind farm is operational. The indicative ports to be used in the project are identified as follows:

| | |
|---|---|
| Marshalling & Assembly (Construction) | Kishorn;<br>Arnish/Stornoway; and<br>Hunterston. |
| Marine Operations (Construction) | Oban;<br>Port Ellen; and<br>Bendoran (Mull). |
| Operations and maintenance | Campbeltown/ Machrihanish;<br>King George V (Glasgow); and<br>Hunterston. |

Life Extension and Repowering

2.11 The operational life of the Project is expected to be 35 years but continued maintenance may allow for life extension of the Project in its built-out form. Once any potential life extension opportunities have been exhausted, repowering may be considered but a new consent (and EIA) would likely be required at this stage.

Offshore Decommissioning

2.12 The submitted project description confirms that in line with the requirements under Section 105 of the Energy Act 2004 (as amended), the Applicant will prepare a Decommissioning Programme for approval by the Scottish Ministers in the pre-construction period which will include anticipated costs and financial securities, and consider good industry practice, guidance and legislation relating to decommissioning at the time.

2.13 At the end of the WDA's operational life, it is expected that all structures above the seabed (except for scour protection and cable protection) will be fully removed where feasible. Driven piles will be cut at the seabed and left in situ and removal of some or all of the offshore cables may be undertaken. Static portions of cables may remain in situ along with scour protection and cable protection (although the method of decommissioning is yet to be determined). Relevant legislation, guidance and good

practice will be followed at the time of decommissioning. Environmental conditions and sensitivities will also be considered since removal of structures may result in greater environmental impacts in comparison to leaving in situ.

## 3. PRINCIPLE OF DEVELOPMENT

3.1 Argyll & Bute Council has no in principle objection to making a positive contribution towards Scottish Government's targets for renewable energy generation within its administrative area. These targets are important given the compelling need to reduce our carbon footprint and our reliance on fossil fuels, reinforced by the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 and Climate Change (Emissions Reduction Targets) (Scotland) Act 2024, further reinforced by recent Scottish Governments policy commitments to increase offshore wind to 40GW by 2040 as part of achieving the overall target of net zero by 2045. The Council will support renewable energy developments where these are consistent with the principles of sustainable development, and it can be adequately demonstrated that there would be no unacceptable significant adverse effects.

3.2 It is noted that this proposal would make a significant contribution of 2GW installed capacity towards renewable energy targets and could theoretically generate enough electricity to power the domestic electricity needs of approximately 2 million average UK households per annum. The development of a commercial offshore wind farm as proposed would therefore reflect UK and national policies and help to meet the ambitious targets for the growth of renewable energy.

3.3 The National Marine Plan states that the Plan Option areas identified in the Sectoral Marine Plan for Offshore Wind Energy (2020) are considered the preferred strategic locations for the sustainable development of offshore wind and marine renewables. The Project proposal is located within the Sectoral Marine Plan West Region, as Plan Option W1, in accordance with Policy RENEWABLES 1 of the National Marine Plan. The proposal would have a generating capacity of around 2GW, which would accord with the 2 GW capacity identified within the Sectoral Marine Plan. Argyll and Bute Council responded to the SMP 'Draft Locational Guidelines' in 2019 providing a range of comments on the proposed approach and supporting the project for its potential to provide stable and clean energy for Argyll and Bute and economic benefits for the region.

3.4.1 The Sectoral Marine Plan (SMP) identified key risk factors to development in the West region including potential impacts on: visual and landscape/seascape character; marine mammal receptors; commercial shipping; bird species, including collision risk and displacement, as well as potential impacts to birds on migratory pathways; benthic habitats and species; migratory fish species; commercial fishing; recreational angling; and cost impacts and associated navigational risk from diverting key commercial shipping routes. The SMP notes that *"There would be the potential for adverse visual impacts and impacts on seascape and landscape character, due to the proximity of the PO to shore, particularly the southeastern part of the PO, however, these impacts may be reduced or avoided via project-level mitigation measures and the now increased distance from shore due to the modified PO."*

3.6 The Plan also confirms that, as part of any decision making on the suitability of Plan Option W1, these would need careful consideration, and mitigation where possible. It is noted that for some adverse effects, potential mitigation measures would be limited but could include the selection of smaller turbines to reduce visual impact. Furthermore, in relation to PO W1 the NatureScot Consultation Landscape and Visual Impact Assessment and Design Guidance[3] on the Sectoral Marine Plan advised that "*there is a limited opportunity to develop the western part of site without significant adverse landscape and visual effects"* and made the following recommendations:

- *maximum turbine height of 200m. As part of design iteration, turbines lower than 200m should be explored to further mitigate significant effects.*
- *limit development to beyond 50km (mitigating significant effects from elevated viewpoint of Paps of Jura NSA and WLA).*
- *limit development to beyond 35km from Colonsay and Islay.*
- *limit development to beyond 35km from all surrounding coastal edges to reduce effects on distinctive coast character, strong frontier qualities and culturally important features such as Iona.*
- *limiting the extent of development within the DPO site reduces the dominating horizontal extent and field of view of turbines, mitigating significant effects in views from the lower lying coastal fringes and from the Paps of Jura.*
- *at the project level, we encourage a single developer to take forward a design led approach to further mitigate effects.*

3.8 The Draft Updated Sectoral Marine Plan (2025) broadly reflects similar issues in its consideration of Option Areas (formerly called Plan Options) and notes its aim to Assess the potential national and regional level opportunities and constraints resulting from potential development with a generating capacity of up to 37.4 GW, providing greater clarity to industry, investors, consumers and the public. The Draft Updated Sectoral Marine Plan reiterates the issues most likely to constrain development in W1 are the collision or displacement risk of birds, navigational risk and potential significant effects on landscapes and seascapes for developments located within 30 km of inhabited shoreline.

3.9.1 The related Strategic Environmental Assessment (SEA) for the Draft Updated Sectoral Marine Plan dated May 2025[4] identifies potentially significant adverse effects for each Option Area. Those relating to W1 continue to include effects on historic environment features and their settings and effects on landscape and coastal character and also on visual receptors effects on landscape and coastal character and on visual receptors.

3.10 The SEA sets out that *"Due to the proximity to the coastline and adjacent land, the development of offshore wind in W1 has the potential to significantly affect the setting of coastal nationally important historic environment features. Such sites include forts, religious sites and a lighthouse. Effects on landscape and coastal character and also on visual receptors. The development of offshore wind in W1 has the potential to significantly affect the seascape character and also the perception of visual impacts to*

[3] Sectoral Plan Consultation - SNH Landscape and Visual Impact Assessment and Design Guidance.pdf
[4] Draft Updated Sectoral Marine Plan for Offshore Wind Energy: Strategic Environmental Assessment Environmental Report

*human receptors. The east and south east of the site is closest to land and hence will have higher visual effects."*

3.11 The SEA further sets out *"Previous advice from NatureScot should also be taken into account. In particular, they recommend the use of a maximum turbine height of 200 m, to limit development to beyond 50 km from the Paps of Jura (NSA), and to limit the horizontal extent within the OA and field of view of turbines. They also advise that development should be limited in the northeast of this OA to reduce visibility from Fionnphort to Iona Ferry and focussed on the west to avoid significant impact on views from islands and ferries, and to reduce perception of wind farm seascape in views from the Paps of Jura (NSA).*

3.12 It is therefore clear that the SMP and more recently published Draft Updated Sectoral Plan and supporting documents to these have sustained that the principal risks to the development of POA W1 relate to significant impacts on landscape and coastal character and also on visual receptors effects on landscape and coastal character and on visual receptors and effects on historic environment features and their settings. Mitigation is acknowledged as being necessary to reduce these risks.

3.13 While the Applicant has applied some mitigation measures to the WDA through the design process to-date including a reduction in the developable area by approximately 40% which has increased the separation distance from island communities and reduced the horizontal spread of turbines in some views – these measures fall short of NatureScot's recommendations. It is not clear on what grounds and on what assessment NatureScot's original design guidance (2019) which was produced to accompany the (then draft) SMP and retained as part of the SEA to the Draft Updated SMP in 2025 was disregarded. In the meeting notes accompanying the submitted Appendix 15 Design Strategy, it is recorded that NatureScot confirmed that efforts to reduce SLVIA effects should instead be considered at a project level through a 'collaborative working arrangement' to help shape the Project's design development with a commitment that the process would continue throughout the pre- and post-application phases.

3.14 At paragraph 108 of the submitted Planning Statement, the Applicant notes that their own consultation response to the draft updated SMP highlighted that the draft updated SMP did not account for the recent design refinements that the Project had committed to, noting the assessments presented in the draft updated SMP were based on 'highly precautionary, and in some cases unrealistic, interpretations of the Project's design'. The submitted Planning Statement at paragraph 160 further contends that: "*Despite these expected significant effects… The retention of POA W1 with the same expected boundary and capacity of 2 GW indicates the Scottish Ministers' strong support in principle for offshore wind development in this specific location.* And further claims that *"This policy judgement also limits the ability to further address inherent SLVIA sensitivities associated with the location and scale of offshore wind development at a project level."* We disagree with this latter statement, given the previously outlined mitigation as part of the assessment of the W1 area in sectoral plans have been discounted in the project development.

3.15 The Project's design objectives are set out in the submitted Appendix 15 Design Strategy and are noted as having been developed to safeguard the integrity and

objectives of nationally important landscapes by striving to reduce significant effects on NSAs, while recognising that some seascape and visual change as a result of the Project is unavoidable. However, it is made clear in Appendix 15 Design Strategy (Table 3.1) that that the Design Objectives will in all cases be balanced against the wider Project Objectives, which include the *'Project's minimum requirements in terms of economic viability, turbine selection and other constraints*.'

3.16 These objectives have been driven by the requirements of the ScotWind leasing process which proceeded on the basis of a 'maximum development scenario' for the W1 POA as having capacity for 2 GW. The applicant notes that *"to maintain competitiveness with other bidders, the project assumed an estimated 2 GW capacity for the purposes of MachairWind's ScotWind bid, with the potential for a reduced operating capacity not being considered further."*

3.17 Argyll and Bute Council officers note that while the continued inclusion of the POA W1 does lend some level of policy support, it does not negate the need to consider whether or not the proposal at the significant scale and extent proposed would be acceptable in this highly sensitive and economically fragile location. The Sectoral Marine Plan states that it is intended to guide the relevant consenting bodies when making decisions on individual licence and consent applications, but it also goes on to state that it should not be considered as pre-determining those decision-making processes. In this instance, it would appear from the submitted material that an overriding factor in the development of the significant scale and extent of the proposal has been driven by commercial project concerns which have translated into project objectives to 'maximise the site capacity'. Project viability and inclusion within the Sectoral Marine Plan does not as a material consideration override the requirements set out under the provisions of the development plan. Neither the National Marine Plan nor the National Planning Framework reference project commercial viability as a material consideration in the determination of national renewable energy projects.

3.18 Furthermore, the ScotWind leasing round far surpassed the Scottish Government's target of 10GW of potential energy supply, with some 27.6GW of supply being identified from 20 developments. Consequently, whilst recognising and accepting the importance of maximising renewable energy generation, it is considered that this should not be at any cost and, further, that the failing to grant consent for the current development proposed for site W1 would not jeopardise the achievement of the energy supply targets in the Sectoral Marine Plan.

3.19 Argyll and Bute Council previously responded to consultation proposing the establishment of an offshore wind farm in this location. However, that was at Sectoral Marine Plan formulation stage, prior to the project being designed and its scale and consequential effects being fully appreciated. Had it been realised that a 2GW development as a key determinate for project design would result in significant impacts despite mitigation, the Council would have registered concern with a proposal of this scale, in this highly sensitive, ecologically valuable and economically fragile location and would have questioned whether a smaller 1 or 0.5GW project would be more suitable and sustainable by reducing the extent of significant impacts.

3.20 Therefore Argyll and Bute Council do not agree with the applicant's assessment that *"the nationally-significant beneficial effects of the Project and its contribution to*

*achieving Scotland's offshore wind ambition, net zero and decarbonisation targets outweigh the identified significant effects."* Overall, it is concluded that in relation to key considerations, that the significant adverse effects of the proposed development on Landscape, Seascape and Visual Impact and on Cultural Heritage impacts cannot be effectively mitigated, and the resulting harm from these effects alone would be so great that, notwithstanding any potential socio-economic benefits or positive impacts on climate change, the Principle of Development of a large-scale offshore windfarm at this location is not acceptable.

## 4. SEASCAPE, LANDSCAPE AND VISUAL IMPACT

4.1 The following comments are provided by the Council's consultant landscape architect – the full assessment can be viewed in Appendix C to this report or on public access.

General approach

4.2 The Seascape Landscape Visual Impact Assessment (SLVIA) set out in Chapter 16 appears to generally accord with the Guidelines for Landscape and Visual Impact Assessment Third Edition and other best practice for wind farm assessment. The Coastal Character Baseline and Assessment presented in Appendix 16.3 also appears to accord with NatureScot's Coastal Character Assessment – Guidance Note. The SLVIA is supported by a range of technical appendices, figures, wirelines, photomontages and ZTV analysis.

4.3 The landscape assessment is generally comprehensive and provides a substantial body of information from which to review the likely seascape, landscape and visual effects of the proposal. Whilst we agree with most of the landscape assessment conclusions, several judgements relating to magnitude and significance of effects appear somewhat conservative, particularly where the proposal influences perceptions of remoteness, wildness and the relationship between the landscape and sea. These are discussed further in the relevant sections of this review.

Design evolution

4.4 Chapter 4: Site Selection and Alternatives, describes an iterative process that has been undertaken to refine the WDA and reduce and mitigate potential environmental effects. The proposal is located within the W1 Plan Option Area (POA) which was identified through the Scottish Governments Sectoral Marine Plan for Offshore Wind Energy. Prior to the adoption of the Sectoral Marine Plan, the size of the POA was reduced to lower potential visual impacts and increase the distance from land.

4.5 Following the ScotWind Award in 2022, further potential constraints were reviewed by the Applicant within the Option Agreement Area (OAA), that resulted in a reduction from approximately 754$m^2$ to 510$km^2$ for the EIA Scoping WDA. There were numerous factors informing the refinement, including seascape, landscape and visual considerations, notably *a minimum buffer of 12km from Colonsay and 15km from Islay* to reduce these effects.

4.6 Following the Scoping Opinion, further constraints were identified through several workshops/webinars, which were undertaken alongside stakeholder and statutory consultation events held on Colonsay, Islay, Jura, Ross of Mull and Iona. The consultations resulted in a reduction of the WDA to 448$km^2$, equivalent to a 12% reduction in total area. The key design changes to the seascape, landscape and visual impacts were as follows:

- Reduction in the northern boundary to reduce the horizontal spread of the WTG lessening the effects on sensitive views, including views towards Dubh Artach Lighthouse from Mull and Iona.
- Reduction of the eastern boundary (0.4km) following consultation feedback regarding seascape, landscape and visual effects on nearby islands communities, increasing separation distance between the WDA and the coast.
- Removal of the southern extent of the Scoping WDA to reduce the horizontal spread of turbines and minimise potential effects on Islay, Colonsay, Jura and nearby National Scenic Areas (NSAs).

4.7 In addition to the refinement of the WDA boundary, the Applicant prepared a design strategy in collaboration with NatureScot. This strategy establishes a series of landscape and visual design objectives intended to minimise likely significant effects on the Special Landscape Qualities (SLQs) of the Jura, Loch na Keal (Isle of Mull) and Scarba, Lunga and Garvellachs NSAs. There are four themes that comprise the objectives, which include *Project Scale*, *Project Extent and Orientation*, *Turbine Layout* and *Location Specific Measures*. Collectively these aim to reduce the apparent scale and visual influence of the proposal, whilst recognising some seascape, landscape and visual change is inevitable. The design strategy (outlined in Appendix 15) acknowledges that design development is an ongoing process and that the design objectives will continue to inform refinement of the final turbine layout during post-consent stage, in consultation with NatureScot as required.

4.8 Overall, the design evolution demonstrates that seascape, landscape and visual considerations have informed the development of the project throughout site selection and refinement process. Whilst these measures are likely to have reduced the extent of the effects, significant residual effects remain for several landscape, seascape and designated landscape receptors identified within the SLVIA.

Landscape Character

4.9 Overall, the Landscape Character Assessment appears to be comprehensive and generally supported by the accompanying ZTV analysis, figures and visualisations. We agree with some of the conclusions presented. However, the SLVIA appears to underestimate effects on LCT 42 (Rocky Moorland – Argyll), specifically the area south of Loch Gorm and; LCT 35 (Rugged Mountains), specifically the Jura units.

4.10 We consider the extent of visibility and influence of the proposal on perceptual qualities such as wildness, remoteness and the relationship with the sea to result in a higher magnitude of impact and significance of effect than those presented in the assessment.

4.11 **For the LCT 42 (Rocky Moorland)** the SLVIA assesses the magnitude of impact from the coastal edge and hills northwest of Loch Gorm as high, reducing to medium on the hills south of Loch Gorm and low elsewhere. On review a medium magnitude of impact south of Loch Gorm appears somewhat conservative during both construction and operation phases. While the assessment identifies a reduction in the scale of change from large to medium for these areas, the ZTV (Figure 16.12) indicates extensive visibility from the coastal edge and adjoining hills. The assessment also acknowledges the proposal introduces a notable new offshore feature across the northwest seaward horizon and influence perceptual qualities associated with the remote character of the

landscape. Although offshore views are not specifically identified within the description of the LCT, the *exposed and windswept* character of the landscape, its *rocky coastline* and presence of isolated farms all contribute to a strong sense of remoteness and close relationship with the sea. This is illustrated in Figure 16.2.3a-l (Appendix 16.4). Given the extent of visibility, alongside the scale of the proposal and influence on these characteristics, it is unclear why the magnitude of impact reduces immediately south of Loch Gorm. We consider that the magnitude of impact (and therefore significance of effect) has been underestimated.

4.12 On review, the low magnitude of impact would appear conservative for **LCT 35 (Rugged Mountains)** units on Jura during both construction and operation phase. As illustrated from Viewpoint 11 (Beinn an Oir) in Figures 16.2.11b (appendix 16.4) and the ZTV analysis presented in Figure 16.12, the proposal would be visually prominent over a wide arc of view northwest. As such the turbines would influence the *strong wilderness qualities* of the LCT and as such a medium magnitude of impact resulting in **moderate** and **significant** effect, would be appropriate to the Jura units.

Coastal Character Assessment

4.13 Overall, the Coastal Character Assessment appears to be comprehensive and generally supported by the accompanying ZTV analysis, figures and visualisations. Whilst we agree with some of the conclusions, the SLVIA appears to underestimate the significance of effects on the following CCAs:

- CCA 7 - Ross of Mull;
- CCA 15 - Loch Tarbert;
- CCA 18 – Sgairail and;
- CCA 20 – Ardnave Point to Rhinns Point.

The proposal would influence key characteristics of these CCAs associated with remoteness, wildness, openness and the relationship between the coastline and the sea and we consider that the extent of visibility, scale of the proposal and influence on defining characteristics would result in a higher magnitude of impact and significance of effect.

4.14 For **CCA 7 – Ross of Mull**, the assessment of a medium magnitude of impact, resulting in a moderate level of significance appears conservative. The ZTV (Figure 16.12) indicates extensive visibility along the southern coastline, particularly the western extent. Viewpoint 20 – Erraid, Mull which illustrates the scale of change that would be experienced from these areas and demonstrates that the proposal would become a notable feature in sea views. We consider that the assessment underestimates the scale of change. This is particularly relevant in relation to the key characteristics associated with *wildness* and *long views south across the Sea of the Hebrides*. Given the extent of visibility and the influence of the proposal on these characteristics, a high magnitude of impact, resulting in a **major** significance of effect, would be appropriate.

4.15 There appears to be an error for the assessment of **CCA 14 – Rubha an t-Sailein to Glendebadel Bay, Jura**. The assessment states the *area predominantly faces east and northeast*. However, the coastline is orientated west and northwest towards Islay and Colonsay.

4.16 For **CCA 15 - Loch Tarbert, Jura**, the assessment (Appendix 16.3, Table 2.24) of a medium magnitude of impact resulting in a **moderate** significance of effect appears conservative. The assessment does acknowledge the proposal would be visible across much of the western end of the CCA and would introduce *a notable new feature into views towards the open sea*. It also recognises that the proposal would *detract from the sense of wildness and the lack of modern human influence experienced in this area of coastline* and that *the channelled views along the loch towards the open sea would be affected*. These effects relate directly to several of the key characteristics of the CCA, including its orientation towards the sea, *dramatic seaward vistas* and *strong sense of remoteness.* Given the wide arc of view at the western end of the CCA, and the assessments acknowledgement that *in some views the turbines will fill the sound*, we consider that a high magnitude of impact and **major** significance of effect, would be appropriate. There is no reference in the assessment to Viewpoint 10 (Loch Tarbert, Jura) Which emphasises the scale of change the proposal would introduce to western views across the Atlantic from the CCA.

4.17 The colours used to delineate **CCA 17 – Sound of Jura and LCT 55 - Coastal Parallel Ridges** are very similar in Figure 16.12, making it difficult to distinguish between the two and accurately interpret the area under assessment. Consideration should be given to revising the colour palette to improve legibility and provide greater clarity regarding the extent of the CCA.

**4.18** **For CCA 18 – Sgairail, Islay**, we consider that the magnitude of impact would be high, rather than medium, increasing the significance of effect from **moderate** to **major**. The proposal would be located predominantly within 20km of the CCA and, according to the ZTV analysis (Figure 16.12), would be visible across much of its extent. Given the scale of the development, the extent of visibility and long- term nature of the effects, the degree of change to the CCA may be greater than reflected in the assessment. The introduction of the proposal has the potential to influence key characteristics, such as *strong sense of wildness* and *Expansive views towards the open sea and the islands of Oronsay, Colonsay, Mull and Jura*, the latter for which is noted.

4.19 For **CCA 20 – Ardnave Point to Rhinns Point, Islay**, the assessment of a medium magnitude of impact, and **moderate** significance of effect, appears conservative. The assessment (Appendix 16.2, Table 2.30) acknowledges that the proposal would be visible along most of the CCA and would affect multiple key characteristics, including the sense of being *at the outer edge of the British Isles* and *Open views out to the Atlantic Ocean*. The assessment also identifies a large geographical extent of effects and notes that the proposal would occupy a very wide horizontal angle of view of up to 71 degrees. It is also notable that the assessment of visual effects experienced at Viewpoints 1 (Ardnave Point), 2 (Saligo Bay) and 4 (Creag Bealach na Caillich), which are representative of views experienced along the CCA, are all assessed as being of **major** and **significant**. Given the widespread visibility of the proposal, its influence on multiple key characteristics and the large geographical extent, we consider that the overall magnitude has been underestimated and a high magnitude of impact and **major** and **significant** of effect would be appropriate.

<u>Landscape designations</u>

4.20 Overall, the assessment of effects on the National Scenic Areas (NSAs) appears comprehensive and generally supported by evidence. However, we consider that the magnitude of impact and significance of effects on several SLQs relating to remoteness, wildness, naturalness and the relationship between the landscape and sea has been underestimated in the SLVIA. We do not agree with the conclusion that the effects on 'the remaining NSA SLQs' presented in Appendix 16.2 would be 'no greater than minor and not significant'.

- For the Jura NSA (a medium magnitude of impact and **moderate** significance for the SLQ *An island close yet remote* and a high magnitude of impact and **major** significance for the SLQ *The distinctive Paps of Jura* would be appropriate.
- For Loch na Keal, Isle of Mull NSA, a medium magnitude of impact and a **moderate** significance would be more appropriate for the SLQs *A voyage from enclosed sea loch to the open Atlantic, Views of an island studded seascape, World famous Staffa and Fingal's Cave* and *A vast natural world, dwarfing human settlement*.
- For Scarba, Lunga and the Garvellachs NSA, a medium magnitude of impact and **moderate** significance would be appropriate for the SLQ *Uninhabited, Remote, Wild Islands*.

Local Landscape Areas

4.21 We generally agree with the assessment of effects on all the LLAs. **Significant** effects of up to **major** significance are predicted for North and West Islay (Coast) and Central, South and West Mull LLAs, and we consider these conclusions appropriate given the extent of visibility identified within the ZTV analysis and the influence of the proposal on the perceptual qualities of these landscapes. Effects on the Jura LLA are assessed as minor and not significant, which also appears reasonable given the distance of the proposal, the partial screening of Colonsay and limited extent of visibility identified within the assessment.

Visual effects

4.22 The SLVIA assesses 30 viewpoints spread across an area up to 60km from the WDA, with either **moderate** or **major significant** effects predicted at 16 of these. Significant visual effects are predicted across a wide area encompassing many of the islands of the Hebrides to the north, south and east of the WDA, at distances of up 39km from the development.

4.23 We consider that effects assessed at several of the viewpoints which were assessed in the SLVIA as not significant, should be considered as **significant**. These are Viewpoint 17: Oban - Colonsay Ferry, Viewpoint 24: Staffa, Viewpoint 27: Ben More, Mull, and Viewpoint 19: Hynish, Tyree. Although these locations lie a considerable distance from the WDA, the very large scale and spread of the proposal mean it would still significantly affect the visual amenity. In addition, we consider that visual effects experienced from Viewpoint 18: Scarab and 19: Cnoc Dhomhuill could, arguably, also be **significant** in clear weather conditions.

4.24 The review also considers that for seven viewpoints the significance of effect should be increased from **moderate** and **significant** to **major** and **significant** due to under-evaluation of either sensitivity or magnitude of effect. These include Viewpoint 9: Colonsay to Port Askaig Ferry, Viewpoint 10: Loch Tarbert, Jura, Viewpoint 11: Beinn an Oir, Jura, Viewpoint 15: Uragaig, Colonsay Viewpoint 16: Summit of Beinn nan Gudairean, Colonsay, Viewpoint 21: Mull – Iona Ferry and Viewpoint 22: Dun I, Iona.

4.25 We also consider that visual effects on residents of Iona, Colonsay and Islay have not been adequately assessed within the SLVIA. The assessment of visual effects experienced from settlements has been limited to include only settlements found within the A&B LDP despite much of the islands' population being in scattered communities. In addition, some viewpoints have been assessed without taking the high sensitivity of residents into account and viewpoints that are stated to represent residential receptors have not been located close to residential properties at Baile Mor and Sligneach on Iona, Kilchattan and Uragaig on Colonsay and Portnahaven on Islay.

4.26 The proposal's size and spread mean that it would significantly affect the visual amenity of over a very extensive area of some of the most valued and scenic seascapes in Scotland. The islands of Colonsay, Oronsay, Islay, Jura, Mull, Iona and Staffa are known for their unspoilt and beautiful scenery and many tourists come to experience their remote undeveloped character.

Policy Assessment

4.27 NPF Policy 4c and National Marine Plan Policy GEN 7 state that proposals that will affect a National Park, National Scenic Area, Site of Special Scientific Interest or a National Nature Reserve will only be supported where:

i. The objectives of designation and the overall integrity of the areas will not be compromised; or

ii. Any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.

4.28 Based on our review, the proposal would result in **significant** adverse effects on several SLQs within the NSAs, which may affect the objectives or integrity of the designation, such that social, environmental or economic benefits of national importance would need to outweigh the effects for the proposal to be supported.

4.29 The SLVIA identifies **significant** effects for the North and West Islay (Coast) and Central, South and West Mull LLAs. NPF Policy 4d require significant effects on the integrity of LLAs or the qualities for which they have been designated to be clearly outweighed by social, environmental or economic benefits of at least local importance.

4.30 The **significant** effects identified on the NSA SLQs and North and West Islay (Coast) and Central, South and West Mull LLAs also result in a conflict with Argyll and Bute LDP2 Policies 70 and 71, which seek to protect the integrity, character and special qualities of these designated landscapes.

4.31 NPF 4 Policy 11e requires project design and mitigation to demonstrate how impacts on communities and significant landscape and visual impacts are addressed. In terms of significant landscape and visual impacts, 11e ii states that such impacts are to be expected for some forms of renewable energy and where impacts are localised and/or appropriate design mitigation has been applied, they will generally be considered acceptable. NPF4 provides no guidance on the definition of what constitutes localised effects.

4.32 Table 16.154 in Section 16.8 of the SLVIA outlines embedded mitigation measures included in the wind farm proposal. Although the above design/ mitigation measures may be considered appropriate and may have reduced landscape and visual effects to some extent, **significant** effects remain for large numbers of receptors. **Significant** visual impacts of the proposals would be experienced by Island communities of Iona, Islay and Colonsay which we consider to be a more than localised area. The proposal would introduce visually prominent wind farm development to a widely visible area of the landscape/ seascape that has none, significantly altering the way the landscape and seascape would be perceived.

4.33 The proposal could also be argued to be contrary to Schedule 9, paragraph 3 of the Electricity Act 1989 to have regard to the desirability of preserving natural beauty and

to NPF4 Policy 4(a) which withholds support from development whose type, location or scale makes its impact on the natural environment unacceptable.

Officer's Conclusion

4.34 Taking into account the extensive geographical extent of the predicted significant effects and the number of landscape, seascape, and visual receptors affected, there is overwhelming evidence that the proposed development would be detrimental to the character, quality, and enjoyment of the coastal areas of Islay, Colonsay, Oronsay, Jura, Tiree, Mull and Iona. Due to the proposed location and scale of the proposal, it is not considered that these significant and adverse effects can be mitigated without a significant reduction in generating capacity. It is also not considered that the significant adverse effects on the qualities for which the affected NSAs have been designated are outweighed by social, environmental or economic benefits of national importance to justify the harm caused.

4.37 **Having due regard to the above it is therefore concluded that the proposal does not comply with the provisions of NMP Policy GEN 7, NPF4 Policy 4c) Natural Places and NPF4 Policy 11e (ii) Energy and Policy 30 – The Sustainable Growth of Renewables of LDP2 as the proposed wind farm would result in extensive significant adverse seascape, landscape and visual effects. Furthermore, these effects would be so significant as to be contrary to Schedule 9, paragraph 3 of the Electricity Act 1989.**

## 5. CULTURAL HERITAGE IMPACTS

5.1 It is expected that Historic Environment Scotland (HES) will provide detailed consultation comments on the magnitude of impacts and significance of effects on Scheduled Monuments and the Council would defer to their expertise on this matter. However, comments are provided on local heritage assets based on the information provided in the submitted in Chapter 14: Offshore and Archaeology and Cultural Heritage and Appendix 14.3 Settings Assessment of the EIAR.

5.2 Chapter 14 of the EIAR identifies the following designated heritage assets within the assessment area: 24 scheduled monuments, 8 listed buildings and one conservation area. The submitted Appendix 14.3 Settings Assessment of the EIAR identifies that of these, the following heritage assets will experience **significant effects** on their settings as a result of the proposed development:

- Oronsay Priory and Cross (SM287)
- Beinn a' Chaisteil (SM13213)
- Dun Bheolain (SM13214)
- St Mary's Abbey (SM12968)
- Iona Abbey (LB12310)
- Dubh Artach lighthouse (LB12320) and
- Iona Conservation Area (CA468)).

5.3 For Oronsay Priory and Cross (SM287) a **'Moderate Adverse'** effect is predicted but this is not predicted to have a significant effect on the Integrity of the Setting as *"Visibility of WTGs would affect the perceived remoteness of the asset and appear prominently in seaward views, but the abbey ruins would remain the principal focus in views in which the asset can be experienced and the relationship of the abbey to the*

*modern farm and coastline would not be affected, leaving the asset in a regionally distinctive setting."*

5.4 For Beinn a'Chaisteil, promontory fort and associated remains, Islay (SM13213) a **'Major Adverse'** effect is predicted but this is not predicted to have a significant effect on the Integrity of the Setting as *"WTGs would be prominently visible as background elements in seaward views from a variety of points within the monument. However, they would not be visible in the principal approach and would only be visible with the monument in more distant views where the asset and the landform on which it is located would remain the principal focus, and the perception of localised dominance of the asset would remain. Views landward would remain unaffected."*

5.5 For Dun Bheolain, fort, Islay (SM13214) a **'Major Adverse'** (significant) effect is predicted but this is not predicted to have a significant effect on the integrity of the Setting as *"WTGs would be prominently visible as background elements in seaward views from a variety of points within the monument. However, they would not be visible in the principal approach and would only be visible with the monument in more distant views where the asset and the landform on which it is located would remain the principal focus, and the perception of localised dominance of the asset would remain."*

5.6 For St Mary's Abbey, Iona, monastic settlement (SM12968) a **'Moderate Adverse'** (significant) effect is predicted but this is not predicted to have a significant effect on the integrity of the Setting as *"WTGs would be visible as distant elements of the background to some views from the asset with varying degrees of prominence. The asset would not be juxtaposed with the WTGs in views from the modern and supposed ancient pilgrimage route and WTGs would not appear in key views identified in the Iona Abbey Statement of Significance and Management Plan. The WTGs would appear juxtaposed with the Abbey church in some views from the north but in these views the church would remain the dominant visual element."*

5.7 The assessment notes that *"While there would be, in some cases, a reduction in the perceived remoteness or expression of dominance, these characteristics would remain legible and understandable to a viewer and their ability to appreciate the contribution of those characteristics to the asset would remain."* The assessment goes on to state that as no effects arising through change to setting have been assessed as higher than a medium magnitude of impact, it is therefore clear that substantial harm would not arise to any designated heritage assets. Therefore, the applicant considers the relevant requirements of the NMP policy GEN 6. It is considered by officers overall, that the impacts identified on the settings of heritage assets have underplayed the unique qualities of this remote and wild area of Argyll and Bute (please see further comments from WoSAS below).

5.8 In terms of the Iona Conservation Area a **'Low Adverse'** impact is recorded as it *"would present a visibly detracting element due to the introduction of modern infrastructure into the setting of the asset, albeit as distant elements of the background of views".* Officers would not agree with the assessment that the *"presence of the WTGs in the distant seascape would not detract from those key aspects which contributes to its cultural significance"* and would argue that the impact on the conservation area (CA) has been underplayed in the EIAR given its designation to protect the unique

architectural, historic and cultural character of the islands village and its surroundings. Furthermore Iona's significance relies on the historic built environment and the timeless natural setting that frames it with reference to the Atlantic backdrop which contributes to its spiritual ambience. These elements combine to create a tranquil yet evocative atmosphere that has inspired pilgrimage, artistry, and conservation efforts for centuries. Protecting this area means carefully managing changes to ensure they preserve or enhance its 'special qualities' as an extraordinary place of national and spiritual importance.

5.8 For the listed building Iona Abbey and the assessment notes that *"While the WTGs would be visible on the horizon in views back towards Ireland, as Ireland cannot be seen from Iona, this view is a symbolic manifestation of connectivity rather than a tangible or physical link that can be quantified. As such, the presence of the WTGs in general views of the horizon and seascape would not sever the symbolic link between Iona and Ireland, although their presence would introduce discernibly modern features into this view. The key views of the Abbey on the modern pilgrimage route as the viewer approaches the Abbey and from the Abbey back towards Mull would not be affected by visibility of the WTGs."* Again, officers would disagree with this assessment given the 'special qualities' of the Iona Conservation Area and the contribution made to this by Iona Abby and its relationship to the Atlantic seascape.

West of Scotland Archaeology Service (WoSAS) comments

5.9 The following are additional comments based on the WoSAS' opinion of the proposal and the wider impact on the archaeology of Iona, Colonsay and Islay. The proposed Machair Wind Farm will have no physical impact on terrestrial archaeological sites. However, the settings of many historic and archaeological sites would be adversely affected by the construction of the proposal under evaluation. Impacts on the settings of designated heritage assets, scheduled monuments and listed buildings which are of national significance were considered by the applicant in agreement with Historic Environment Scotland.

5.10 The emphasis on discrete designated sites establishes that those closest to the proposed development, north-west Islay and, Colonsay and Oronsay are most affected with a lesser impact felt with distance. However, the intrusion created in the views and seascape between the west coasts of Islay and Colonsay and Iona by the proposals is not given sufficient weight. The significance of the sea as a means of access and source of drama and mythology in the Early Christian period is undervalued. The open seaward horizon makes an intangible contribution to the region's historic environment. This is of particular importance when considering the impact of the proposals on the visitor to monastic sites. Travelling by sea and the views across the open horizon underpins the story of Saint Columba's and his choice of Iona for his monastery. A sea journey, often associated with miraculous events, is a feature in the stories of other saints' lives.

5.11 More tangible evidence of the sea's contribution to the region's archaeological record can also be found. The west coast archipelago illustrates this in the physical similarities between monuments and artefact distributions from the Neolithic period through early medieval period when both religious and secular communities had deep connections

with Ireland. It continued in the Viking period when Dublin and Mann along with Orkney became important centres of power and the close ties between the west coast of Scotland and Antrim continued into the early modern period resulting in confrontation with the English Elizabethan state in Ireland.

5.12 By interrupting the view west from Islay and Colonsay and south from Iona the important intangible elements of setting contributed by how sites are "understood, appreciated and experienced" will be weakened.

Non-Designated Heritage Assets

5.13 Terrestrial non-designated heritage assets have not been considered in the EIA process. A search of the Historic Environment Record (HER) to an arbitrary distance of 25km establishes that there are many records relating to this class of archaeological site. During the 1990s Historic Scotland provided funding to the council's archaeology service to draw up a Non-Statutory Register of monuments likely to be of national importance within the HER. This assessment against contemporary scheduling criteria identified 138 such sites which appear to lie within the 25km search area.

5.14 These comprise a wide variety of archaeological sites from all periods ranging from burial sites, caves and standing stones through chapels, farmsteads, sheilings and field systems. Some are likely to contribute to the landscape and seascape of the region, and many will have their setting affected by the proposed wind farm. For example, up to 17 prehistoric standing stones are identified in this data. These may have been placed to view astronomical events on the horizon relative to another landmark (very long-distance sightings have been suggested for some west coast alignments). Changes to the horizon may have a considerable negative impact to the setting of a standing stone and the ability of visitors to appreciate its placement and function.

5.15 It is WoSAS opinion that the submitted EIA has underplayed the adverse impacts on intangible elements of the setting of designated and important non-designated heritage assets. Their contribution to a wider understanding, appreciation and experience of heritage sites have not been adequately discussed.

Policy assessment

5.16 GEN 6 of the NMP states *"Development and use of the marine environment should protect and, where appropriate, enhance heritage assets in a manner proportionate to their significance".* Paragraph 4.23 of the NMP goes on to state *"[…] Designated heritage assets – representing sites of national or international significance for which statutory requirements apply. Designated assets should be protected in situ within an appropriate setting. Substantial loss or harm to designated assets should be exceptional and should only be permitted if this is necessary to deliver social, economic or environmental benefits that outweigh the harm or loss […]".* The applicant claims that 'despite a reduction in perceived remoteness or expression of dominance, the characteristics of Scheduled Monuments remain 'unchanged'.'

5.17 This is especially important given the emphasis placed on the potential for significant effects on cultural heritage including the highlighted "*potential to significantly affect the*

*setting of coastal nationally important historic environment features. Such sites include forts, religious sites and a lighthouse" as* identified within the Sectoral Marine Plan and Draft Updated Sectoral Marine Plan.

5.18 LDP Policy 30 requires that proposals for renewable energy should be assessed against impacts on the historic environment, including scheduled monuments, listed buildings and their settings. LDP 2 Policy 17 – Conservation Areas sets out that there is a presumption against development that does not preserve or enhance the character or appearance of an existing or proposed conservation area or its setting. The developer is expected to satisfactorily demonstrate to the planning authority that the effect of a proposed development on a conservation area and its wider setting has been assessed and that measures will be taken to preserve or enhance the special interest of the area. LDP2 Policy 16 – Listed Buildings requires the developer to demonstrate to the planning authority's satisfaction, that the effect of a proposed development on a Listed Building, its curtilage and wider setting has been assessed and that measures will be taken to protect, conserve and where appropriate enhance the special interest of the asset.

5.19 It is clear that the visibility of this industrial scale development from the coasts of neighbouring islands will negatively impact the general character of these important, remote and historically and culturally significant sites. The exceptional preservation of the cultural heritage remains of the early Christian period are linked into the present-day culture of the island's communities and are an important asset in terms of tangible and intangible heritage, cultural engagement, and sense of place. the impact of the proposal will result in a number of acknowledged significant effects on cultural heritage assets.

5.20 For the reasons set out above, it is considered that this development is not appropriately located and the likely resulting effects of the proposal on the setting of terrestrial heritage assets are seriously underestimated in terms of their remoteness and spiritual importance as a key component of their setting. **Consequently, the proposed development would result in significant effects to the historic environment and would not accord with National Marine Plan Policy GEN6 – Historic Environment, NPF4 Policy 7 – Historic Assets and Places, LDP2 Policy 30 – Sustainable Growth of Renewables, 16 – Listed Buildings, Policy 17 – Conservation Areas and LDP2 Policy 19 – Scheduled Monuments.**

## 6. NET ECONOMIC IMPACT, INCLUDING LOCAL AND COMMUNITY SOCIO-ECONOMIC BENEFITS

6.1 It should be noted that the Council has not undertaken technical analysis of the economic impacts assumed within the EIA. It is recommended that the Marine Directorate consider commissioning an independent economist to interrogate assumed employment and GVA impacts, and to further analyse areas within the methodology and assumptions made.

6.2 The submitted Socio-economic Assessment has identified a number of significant beneficial effects for the construction and operational and maintenance (O&M) phases. These include:

Construction Phase

- A major beneficial economic impact at the marshalling and assembly port (Hunterston);
- A major beneficial economic impact at the marine operations base (Oban);
- A moderate beneficial economic impact on the Scottish economy;
- A major beneficial effect on habitability at the marshalling assembly port (Kishorn);
- A major beneficial effect on habitability at the marine operations base (Bendoran); and A major beneficial effect on the rest of Scotland (excluding construction ports) from interconnecting influences.

O&M Phase

- A major beneficial economic impact at the O&M port (Campbeltown and Machrihanish);
- A moderate beneficial economic impact in Scotland;
- A major beneficial effect on communities at the O&M port (Campbeltown and Machrihanish);
- A major beneficial effect on housing at the O&M port (Campbeltown and Machrihanish);
- A major beneficial effect on the labour market at the O&M port (Campbeltown and Machrihanish); and
- A major beneficial effect on habitability at the O&M port (Campbeltown and Machrihanish).

The submitted assessment concludes that no significant adverse socio-economic effects have been identified. It is noted that some local ports are identified as being suitable for the construction and operational phases of the project and this would be supported to ensure a community level economic investment. However, no firm commitment is made at this stage and therefore benefits may be limited to the operational and maintenance phases.

6.3 The submitted Appendix 18.1 Socioeconomic Technical Report explores supply chain distribution and predicts that the total expenditure on onshore and offshore infrastructure during the development and construction phase of the MachairWind Offshore Windfarm would be £6.0 billion, with an additional £406 million of costs during the first six years of O&M. The supply chain analysis identified £1.8 billion of development and construction phase spending and £304 million of O&M spending that would be retained in the Scottish economy. For the rest of the UK, £1.3 billion of development and construction phase spending and £61 million of O&M spending was identified as being retained in the UK economy.

6.4 The Socio-Economic Technical Report notes that the WDA will contribute to the Scottish and UK economies during all phases and estimates that the average annual O&M expenditure for MachairWind Offshore Wind WDA is expected to be £66 million GVA. The largest opportunities in Scotland are expected to be in turbine maintenance and service, maintaining balance of plant and providing operational insurance. On this

basis, it is anticipated that £50 million of annual O&M expenditure would be secured in Scotland and £59 million in the UK (including Scotland).

6.5 By using economic ratios and multipliers, the submitted report estimates that the annual economic impact from O&M would be £29 million GVA and 390 jobs in Scotland and £55 million GVA and 740 jobs in the UK (including Scotland). It is anticipated that around £143 million will be spent at ports during the development and construction phase. Of this it is anticipated that around £113 million (79%) will be spent at marshalling and assembly ports on contracts associated with warehousing, tower assembly and vehicle berthing. A further £30 million (21%) will be spent at the Marine Operation Base on contracts associated with tower assembly and construction activities. During the operation phase and of particular relevance to Aryll and Bute Council, there will be 60 employees located at the O&M port, (which could be Brendoran, Port Ellen, Oban, Campbelltown or Machrihanish) with associated supply chain expenditure, including the use of laydown and warehousing space, and the berthing of vessels.

Socio-Economic Action Plan

6.6 The Project has developed a Socio-Economic Action Plan (SEAP) which sets out how the Applicant will develop, build and operate MachairWind in a manner that maximises social, economic and wider benefits for its host island communities, Argyll and Bute, the West of Scotland, and Scotland more broadly. The Action Plan is built around five core, interlinked outcomes that represent the economic and social value that MachairWind seeks to deliver at national, regional and community levels:

- Being A Good Neighbour: commitment to regular community engagement through a Good Neighbour Feedback Loop. It highlights a buy local first policy which prioritises local spend where possible on services like catering, transport and accommodation. Commitments to ensuring a lasting host-community legacy through the establishment of Community Benefit Funds (CBFs) for the Project's operational phase.
- Maximising Local Employment Opportunities: commitments to building a skilled local talent pipeline. Supporting a minimum of 5 apprenticeships or work experience placements during construction; piloting a Science, Technology, Engineering, and Mathematics (STEM) Returners Programme with 3 places and funding one masters level scholarship per year of construction; STEM workshops with schools, and supporting the Fit 4 Offshore Renewables Scottish Islands & Coastal Communities Programme. Commitments are also made to collaborate on housing and service strategies and to share workforce projections.
- Maximising Opportunities for Scottish Businesses in Supply Chains: supports growth pathways and new entrants through the Offshore Wind Growth Partnership, the Clean Energy Cluster and Offshore Renewable Energy Catapult. Commitments are made to promote supply chain opportunities at local and regional events, host supplier engagement events and maintain a register of Argyll and Bute suppliers. Commitments include conducting a baseline survey of West of Scotland suppliers, running a “local lot” pilot project tender to engage with local small and medium size enterprises to test

accessibility of procurement routes, and a requirement for Tier 1 contractors to identify, engage and contract with suppliers in Argyll and Bute.

- Contributing to Placemaking: There will be opportunities to embed the Project in the unique context and aspirations of port and host communities. Commitments include supporting the delivery of placemaking within adopted Local Development Plans and explaining planned infrastructure investment by publishing clear summaries of works. The Project will also make up to £25 million available through an Offshore Wind Stimulus Fund which will support the development of Scottish infrastructure, facilities and workforce. Placemaking contributions also include plans to conserve habitats and mitigate environmental impacts, considering post construction reuse of assets and working with local communities to identify improvements to local facilities and services which may be eligible for support from future CBFs.
- Contributing to Regional Economic Development: includes commitments to align the Projects logistics, infrastructure, and skills investment with regional investment priorities where possible, and collaborating with regional stakeholders to identify and develop opportunities that generate regional benefits. This will involve maximising local job opportunities, supporting and diversifying the region's economic base, improving physical infrastructure and expanding access to education and training.

6.7 Matters of particular concern to Argyl and Bute Council focus on delivering the objectives of the Council's Economic Strategy and Local Housing Strategy. The commitment to work on housing strategy is welcome but this will need to be supported by funding for delivery, should consent for the proposal be granted. In addition, the assessment of key sectors of commercial fishing and tourism/recreation are considered to be under-explored in the submitted assessments which largely reply on desk-based studies and an assumed 'low impact' on tourism. It is also noted that displacement of employment may be an issue for fragile local economies and employment markets and this has not been considered in the submitted assessment.

Community benefit

6.8 The economic benefits associated with this proposal during construction and the operational phases relating to job creation and benefits to the local economy are a relevant material consideration in the planning balance. Community Benefit funding itself is not however, a 'material planning consideration' in the determination of planning applications, as there is no planning mechanism available to secure it aside from best practice guidelines set out for on-shore windfarm section 36 applications. For offshore wind farms there is no equivalent mechanism to secure community benefit contributions and these are instead made on a voluntary basis. If Scottish guidelines for onshore windfarms were to be followed, a £5,000 contribution per MW of installed capacity this proposal could generate £10million per year for community projects.

6.9 If consent were to be granted, the negotiation of any community benefit either directly with the local community or under the auspices of the Council, would take place outside the application process.

Tourism impacts

6.10 Tourism is a significant sector in Argyll and Bute and Community Councils have raised concerns about potential impacts on tourism as a result of the proposals. Where the submitted Socioeconomic Assessment and Technical Reports identify tourism impacts, its significance to local economies is considered to be significantly underplayed. The assessment acknowledges that potential tourism impacts would arise if effects identified in other assessments led to changes in tourist behaviour, such as a change in visitor numbers and/or expenditure and uses a study area that includes Colonsay and Oronsay; Islay; Jura; and Mull and Iona.

6.11 Table 18.6 of the SocioEconomic Assesment sets out the realistic worst-case scenarios for impacts on socio economics and for identified Impact 9: Changes to Tourism sets out that *"based on the findings of the seascape, landscape and visual impact assessment (Chapter 16 Seascape, Landscape and Visual Impact Assessment). Changes to visitor behaviour may occur if an area is reliant on environmental conditions that are affected by the WDA."* However, this assessment concludes that no significant effects were identified on the tourism economies of Colonsay and Oronsay, Islay, Jura, Mull and Iona which have all been identified as having 'low sensitivity'. Argyll and Bute Council would question this assessment and urge that sufficient weight is placed on this issue, given the SEA for the Sectoral Marine Plan identified negative impacts on the commercial fisheries, commercial shipping, and tourism and recreation sectors for this proposed windfarm area.

6.12 In the absence of detailed assessments of tourism impacts on the most locally affected fragile island economies, it is recommended that this matter should be further investigated prior to consent and/or a requirement to develop a Tourism Support Strategy should be attached to any consent granted. This should be developed in line with key tourism stakeholders and emerging tourism strategies.

Policy assessment

6.13 Policy GEN 19 of the National Marine Plan requires decisions to be founded on sound socio-economic evidence and, where evidence is inconclusive, requires reasonable efforts to fill the gaps and the application of precaution. NPF4 Policy 11 – Energy states that proposals will only be supported where they maximise net economic impact, including local and community socio-economic benefits such as employment, associated business, and supply chain opportunities. Policy 30 – the Sustainable Growth of Renewables of LDP 2 requires all applications for wind turbine developments to be assessed in terms of net economic impact, including local and community socio-economic benefits such as employment, associated business, and supply chain opportunities.

6.13.1 Policy 11 of NPF4 does not include a requirement for the impact of proposals on tourism to be assessed. However, Policy 30 – The Sustainable Growth of Renewables of the LDP does, reflecting the significance of this sector to the Argyll and Bute economy. The spectacular seascapes and landscapes of the area are regarded as being a particularly highly valued asset in terms of the contribution it makes to the tourism economy. For all types of development, the maintenance of landscape character is an important facet of decision-making in the countryside in Argyll & Bute, regardless of the scale of development proposed. This proposal is acknowledged as

having a significant and widespread seascape, landscape and visual impact which is likely to result in the deterioration in the enjoyment of the landscape as it is accessed by identified 'visual receptors' including both residents and tourists.

6.13.2 Having due regard to the above it is considered a degree of net economic impact including local and community socio-economic benefits typical of such developments will be provided. However, there is insufficient detail to determine at this stage that these benefits are sufficient – particularly at the community level – to have been 'maximised' as required by NPF4 Policy 11e and to mitigate the significant effects acknowledged to be caused by the proposal.

**6.13.3 It is therefore concluded that there is insufficient information to determine whether the proposal is consistent with the provisions of National Marine Plan GEN2 – Economic Benefit, GEN3 – Social Benefit, GEN – 19 – Sound Evidence; NPF4 Policy 11 – Energy, NPF4 Policy 25 – Community Wealth Building and Policy 30 – The Sustainable Growth of Renewable of LDP2.**

## 7. PROCEDURAL MATTERS

7.1 In relation to the EIA Regulations, recent case law (Raeshaw Farms Limited v Scottish Ministers [2026] CSIH 10) has confirmed the need for a clear identification of what constitutes a 'project', as a fundamental requirement to enable a robust assessment of significant effects on the environment to be undertaken. In that case, the judgement concerned a windfarm and grid connection and highlighted the need to consider whether this constituted 'a single project for which an EIA Report that analysed the potentially significant cumulative effects of both aspects was required.' Not to do so was considered a material error. The judgement refers to the need to consider the true nature and scope of the project, to determine whether the wind farm construction and grid connection were so closely connected as to form part of a single project.

7.2 Further, although the grid connection was not included in the planning application, in that case, considerable weight had been placed on the wider benefits that would result from the operation of the windfarm once the grid connection was in place. The judgement considered it irrational to take these wider benefits into account without also taking account of any adverse impact that the development may have, to the extent that it was possible to do so. Whilst the judgement relates to a planning application, the provisions of the EIA Regulations are similar across the different consenting regimes. In this case, it is clear from the documentary submissions that the offshore and onshore elements of the proposed development are considered by the applicant to be a single overall project, which has been subdivided into onshore and offshore elements to reflect the different consenting processes.

7.3 Scottish Government guidance in Circular 01/2015 (relationship between the statutory land use planning system and marine planning and licencing) makes it clear that the choice of application process rests with the developer, although it advises that in most cases, a single consenting process will be more efficient and effective and this approach is encouraged. Nonetheless, even if a requirement for flexibility in the application process is such that separate applications are made (as in this case), it is considered that this does not negate the need to undertake an environmental impact assessment on the significant effects on the environment of the works or development as a whole.

7.4 The consent and marine license applications for part of the Offshore Export Cable Corridor and Onshore Transmission Development Area (OnTDA) do not form part of this S36 application due to the ongoing coordination of the offshore grid network elements. However, the applicant notes that the submitted WDA EIAR assesses likely significant effects in two steps by considering the source, pathway and receptors for:
• The WDA alone; and,
• The WDA, Offshore ECC and OnTDA combined assessment.
The applicant notes that this approach enables potential interactions between each Development Area to be identified and assessed, ensuring a whole Project assessment is undertaken in a manner that is meaningful and proportionate. However, due to a lack of information, a set of assumptions have been developed to inform the combined assessment and within the upcoming Offshore ECC and OnTDA consenting applications.

7.5 It is noted that this approach does not enable robust and systematic assessment of the likely significant environmental effects of the project as a whole. Where undertaken, the assessment of combined likely effects reflects this, with findings that are by necessity less specific and based on anticipated impacts. While the onTDA is likely to lie outside of the Argyll and Bute administrative area, it makes it difficult to assess the full impact on key areas of interest such as socio-economic impacts at a local level which are key to the planning balance.

Approach to the EIA

7.7 In addition, in relation seascape, landscape and visual impacts, Cultural Heritage and Socio-Economics, as indicated above, there is concern that effects have been underestimated and in the case of socio-economic matters, key analysis has not been undertaken to inform impacts on tourism and recreation in fragile local economies. The resultant findings are not therefore not considered sufficiently robust to enable confidence in the conclusions reached. Consequently, it is considered that the submitted EIAR fails on these matters to identify the full extent of significant environmental effects of the project as a whole.

Compensation and mitigation measures – prematurity

7.8 This proposal is acknowledged in its supporting EIAR to result in significant harm on a range of seascape, landscape and visual impacts and cultural heritage assets. The applicant seeks to make an argument that any significant impacts are outweighed by socio-economic and national renewable energy generation benefits. These benefits are in themselves not considered to be robustly defined to justify the significant harms caused, as set out above.

7.9 Nevertheless, it is also noted that a project of this type and scale with acknowledged significant effects will rely on a degree of mitigation in order to achieve a 'planning balance'. The Scottish Government recently published its updated Offshore Wind Policy Statement (2026)[5] which clarifies that The Scottish Government is now resetting its offshore wind policy ambition to up to 40 GW of new offshore wind capacity by 2040, in addition to the already operational or consented capacity (as of August 2025 when the consultation ended). The consultation undertaken by the Scottish Government identified that in order to identify the full potential of Scotland's offshore wind sector, additional actions were required to:

[5] Update to the 2020 Offshore Wind Policy Statement: Scotland's Offshore Wind Ambition

- understand and minimise the environmental impacts;
- to ensure communities benefit directly; and
- to ensure policy alignment between Scottish Government, the UK Government and agencies.

7.10 The proposed updated SMP-OWE is planned to be supported by a range of formalised strategic compensation measures following the development of new policy and guidance on how to address the environmental impacts of offshore wind activities through compensatory measures by Scottish Government for the Scottish inshore region (0-12nm) and UK Government in the Scottish offshore region (beyond 12nm). This will include building a portfolio of strategic compensatory measures for Scottish offshore wind projects; the potential establishment of a Scottish Marine Recovery Fund to accelerate offshore wind consenting and deliver the measures necessary to compensate for the environmental impacts; and an updated and improved community benefits Good Practice Principles guide (due later in 2026).

7.11 It could therefore be considered premature to determine a proposal of this scale with acknowledged significant effects/impacts before such measures have been introduced. Decision makers should ensure equity of compensation and mitigation for all projects progressed through the strategic marine planning process regardless of consenting timelines.

## 8. CONCLUSION

8.1 This proposal benefits from policy support as a National Development for “Strategic Renewable Electricity Generation” within a site that has been identified for Offshore wind delivery in the Sectoral Marine Plan (2020) and Draft Updated Sectoral Marine Plan (2025). Nevertheless, this is not blanket support and such projects are still required to be assessed against all the relevant provisions of the Development Plan, which in this case, consists of the National Marine Plan, the National Planning Framework 4 (NPF4) and the Argyll and Bute Local Development Plan 2 (LDP 2).

8.2 NPF4 and the NMP are clear that significant weight is to be placed on the contribution of proposals to tackling the climate crisis through renewable energy generation and reducing greenhouse gas emissions. However, these are not the sole policy considerations and a planning balance must be reached in terms of the impact of the development, taking into consideration all relevant provisions of the development plan. In this instance, the applicant’s submission clearly identifies that despite mitigation measures having been applied throughout the design process, the proposal will still result in extensive significant effects on seascape, landscape and visual impact and on cultural heritage assets. Argyll and Bute Council officers agree with these assessments and in some cases, consider the identified significant impacts have been underplayed in the EIAR.

8.3 In terms of seascape, landscape and visual impact, the proposal’s size and spread on the horizon mean that even with mitigation, it would significantly affect visual amenity over an extensive area of some of the most valued and scenic seascapes in Scotland. The islands of Colonsay, Oronsay, Islay, Jura, Mull, Iona and Staffa are known for their unspoilt and beautiful scenery and a valuable cultural heritage offer which is intrinsically linked to their remote Atlantic seascapes. Many tourists come to this area of Argyll and Bute to experience its remote and undeveloped character and Iona Conservation Area is recognised for its ‘special qualities’ as an extraordinary place of national and spiritual importance. The significant effects identified on the NSA SLQs and North and West Islay (Coast) and Central, South and West Mull LLAs result in a

conflict with NPF4 policies 4c and 4d; NMP Policy GEN7; and Argyll and Bute LDP2 Policies 70 and 71, which seek to protect the integrity, character and special qualities of these designated landscapes.

8.4 NMP Policy GEN7, NPF4 Policy 4c and 4d (Natural Places) – set out that proposals that cause significant effects on the integrity of both national and locally designated landscapes or the qualities for which they have been designated must be clearly outweighed by social, environmental or economic benefits. Although there are acknowledged to be likely national level economic benefits to this proposal, socio-economic matters have not been appropriately assessed in the EIAR with regards to the fragile local island economies which depend on tourism and recreation and will undoubtedly be most impacted. This inadequate assessment means it cannot be determined that there are no 'unacceptable impacts' on local communities or on tourism and recreation as required by LDP2 Policy 30.

8.5 NPF4 Policy 11e requires project design and mitigation to demonstrate how impacts on communities and significant landscape and visual impacts are addressed - recognising that such impacts are to be expected for some forms of renewable energy and that where impacts are localised and/or appropriate design mitigation has been applied, they will generally be considered to be acceptable. Although the design/ mitigation measures undertaken to date may have reduced landscape and visual and cultural heritage effects to some extent, **significant** effects will remain for large numbers of receptors across a wide geographical area. This is due to the scale of the proposal and its resulting prominence in a highly sensitive seascape setting of national, regional and local importance. It is therefore not considered that the proposal for an extremely large scale 2GW windfarm is appropriate in this location or that further mitigation can reduce the effects while the generating output remains fixed.

8.6 The proposal is therefore be argued to be contrary to Schedule 9, paragraph 3 of the Electricity Act 1989 to have regard to the desirability of preserving natural beauty and historic assets and to NPF4 Policy 4(a) which withholds support from development whose type, location or scale makes its impact on the natural environment unacceptable.

8.7 In conclusion, it is recommended by Officers that the Planning Authority objects to this proposal on seascape, landscape and visual impact and cultural heritage impact grounds. Further mitigation measures are unlikely to reduce the widespread significant and adverse visual effects of the proposal on national, regional and local seascapes and landscapes and on cultural heritage assets due to the large-scale nature of the proposal in this highly sensitive location. Officers do not consider that the assumed national benefits of the proposal should override the inadequately assessed impacts of the proposal on the fragile local island economies most affected.

## 9. RECOMMENDATION

9.1 Following examination of relevant parts of the EIA Report and supporting documents and having regard to the consultation responses and advice received (as detailed in Section 'C' of the Report of Handling) it is recommended that Argyll and Bute Council:

**(7)** Raises an **objection** to the proposal on **seascape and landscape visual impact grounds,** as the proposed offshore wind farm would result in extensive significant adverse seascape, landscape and visual effects at national, regional and local levels contrary to Policy GEN 7 of the National Marine Plan, Policy 11 and Policy 4 of the National Planning Framework 4

and Policy 30, 70 and 71 of the Argyll and Bute Local Development Plan 2.

**(8)** Raises an **objection** to the proposal on **cultural heritage impact grounds,** as the proposed offshore wind farm would result in significant effects on the setting of terrestrial heritage assets and on the setting of Iona conservation area, contrary to the provisions of Policy GEN 6 of the National Marine Plan, Policy 7 of the National Planning Framework 4 and Policy 16, 17 and 19 of the Argyll and Bute Local Development Plan 2.

**(9)** Raises an Objection in relation to the **principle of the development** of the proposed offshore windfarm at the proposed location and, as a consequence of its location, scale and nature, its likely significant adverse effects on seascape, landscape, and visual amenity, and on the unique cultural heritage assets of the planning authority area. These significant adverse effects are such that they are considered to outweigh any positive contribution to renewable energy generation and climate change targets.

**(10)** Notes to Scottish Ministers that Argyll and Bute Council considers that the significance of effect of this proposal on both seascape landscape and visual impact and on cultural heritage grounds is so great that the proposed development would **fail to meet provisions within The Electricity Act 1989**, which require Scottish Ministers, in considering proposals for consent, to have regard to the desirability of preserving natural beauty of the countryside, and of protecting sites, buildings and objects of architectural, historic or archaeological interest, and to do what can reasonably be done to mitigate any such effects.

**(11)** Raises strong concerns about the adequacy of the EIA Report, in relation to the assessment of the significant negative environmental effects of the project as a whole, and specifically in relation to underassessment of the significance of seascape landscape and visual impacts, cultural heritage impacts and a lack of assessment of the full range of socio-economic and tourism and recreation impacts on the fragile local communities most impacted.

**(12)** Raises concerns about the prematurity of determining this application in the absence of further information being submitted to address identified inadequacies and in advance of any of the proposed statutory mitigation and compensation programmes being implemented.

## APPENDIX B

## REGULATING OFFSHORE WIND FARM DEVELOPMENT IN SCOTTISH WATERS[6]

### Sectoral Marine Planning for Offshore Wind Energy

1.1 This process sits within the Scottish Government's Offshore Wind Directorate and is a process that identifies preferred spatial options in Scottish waters to support the sustainable development of offshore wind. Scotland's National Marine Plan

1.2 Marine Planning sits within the Scottish Government's Marine Directorate and any authorisation or enforcement decisions must be taken in accordance with the appropriate marine plans. If a public authority makes an authorisation or enforcement decision other than in accordance with the appropriate marine plans, it must state its reasons.

### Seabed Leasing

1.3 Seabed leasing is the responsibility of the Crown Estate Scotland (CES) who manage the Scottish Crown Estate on behalf of Scottish Ministers. The responsibilities of CES include awarding and managing leases and other types of agreements to organisations who want to build offshore wind farms. The most recent leasing rounds have been ScotWind and INTOG.

### Marine Licensing and Electricity Act Consenting

1.4 This is the responsibility of the Scottish Government's MD-LOT, which acts on behalf of Scottish Ministers, to provide an independent regulatory function.

1.5 A range of Marine Licensing and/or Section 36 consenting requirements is required at various stages of developing offshore renewable energy projects, for example, consent under Section 36 of the Electricity Act 1989 is needed to construct and operate a wind farm.

[6] Draft Updated Sectoral Marine Plan for Offshore Wind Energy, Scottish Government, May 2025 pp 85

## APPENDIX C Full Consultant Landscape Comments

**Argyll and Bute Council**
**Development and Economic Growth**

**This Supplementary report is a recommended response to the Scottish Government's Marine Directorate (MD-LOT) Section 36 Consultation on the proposed Machair Offshore Wind Farm.**

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**Reference No**: 26/01100/S36 and MD-00012385 / MD-00012386
**Applicant**: Scottish Power Renewables/MachairWind Limited
**Proposal**: A project design envelope approach comprises 91 335m blade tip height turbines or 144 280m blade tip height turbines above lowest astronomical tide within the Wind Development Area (WDA), offshore substation platforms, inter-array cabling, and associated infrastructure. The turbines will have a combined rated capacity of approx. 2GW.

**Site Address**: 15km northwest of Islay and 12.4 west of Colonsay within the W1 Plan Option Area with a total area of 448 km2

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**SUPPLEMENTARY REPORT NO. 1**

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## 1. INTRODUCTION

This application is to be presented to the Planning, Protective Services and Licensing (PPSL) Committee on 15th September 2026. Following the publication of the Report of Handling, it has become evident that two consultation responses submitted to the Council have been omitted from the report in error. These are summarised below and are available in full on the Council's public access system.

**Jura Community Development Trust (summary of response dated 14.8.2026):** Recognises the need to increase renewable energy generation and supports principle of investing in sustainable, low-carbon energy. Neither supports of objects to the proposal and raises the following points:

- **Consultation and community participation:** Recognises the time and effort spent engaging with local communities throughout the development of the proposal – however consultation sits relatively low on the ladder of participation and for developments of this scale and significance, the ambition should be to move towards genuine partnership, shared influence and community empowerment.
- **Scale and Proportionality:** Machair is a nationally significant infrastructure project that will have implications for the surrounding islands for decades. Large scale projects should be judged on whether they leave host communities stronger, wealthier and more resilient by ensuring a greater share of economic value remains within rural and island economies.
- **Transparent Framework for Community Benefit:** If consent is granted the focus must shift towards securing the highest possible level of community participation, ownership and long-term benefit by establishing an accountable framework for community benefit. This should include a clear methodology for how community benefit is calculated, transparent arrangements for allocating funds between communities, locally accountable governance structures, meaningful community representation in

decision-making, community priorities driving investment decisions, regular public repotting on funds received, investment decisions and outcomes and periodic review over the lifetime of the project.

- **Beyond Annual Community Benefit Funds:** If consent is granted, a development of this scale should include opportunities for community ownership or equity, strategic investment in community infrastructure, affordable housing, community owned renewable energy and local energy resilience, transport and digital connectivity, skills, apprenticeships and long-term employment pathways, economic diversification and local enterprise and capital investment that generates sustainable future income.

**Islay Community Council (summary of detailed response 25.8.2026):**

**Seascape, landscape and visual impacts:** The two coastlines nearest the development are those which the applicant's own consultants find to be significantly and adversely affected. From Loch Gruinart the applicant calculates that the Project would occupy up to some 65 degrees of the horizon, and it records that the turbines would appear on the skyline behind the northern Rhinns peninsula and *"may therefore be perceived as an onshore wind farm rather than an offshore development".* The applicant does not present these effects as capable of being reduced. In the operational assessment for CCA 20 it states that the introduction of the Project into views out towards the open sea would adversely affect the sense of being at the edge of the British Isles, and that views along the coast towards distinctive features including the Dun Bheolain headland would also be adversely affected. Policy 30 of the Local Development Plan supports renewable energy development only where it can be adequately demonstrated that there would be no unacceptable environmental effects on local communities, landscape character and visual amenity; that demonstration has not been made for these coastlines. The Community Council submits that the proposal is in conflict with NPF4 Policy 4(d), with the concession relied upon in Policy 11(e)(ii), with GEN 7 of the National Marine Plan and with Policy 30 of the Local Development Plan; that the conflict is established on the applicant's own evidence; and that it is a conflict of substance rather than of form, because it concerns significant adverse effects, along the entire length of two designated coastlines, which the applicant proposes to do nothing to reduce.

**The setting of Islay's coastal monuments:** The coastlines which the applicant assesses as significantly affected are also where the coastal monuments of western and northern Islay stand. The setting of a heritage asset is capable of being harmed by development at a distance, without any physical interference with the asset itself. A study area of the development area with a 50 km buffer was agreed with Historic Environment Scotland for the purpose of assessing effects on the setting of designated assets. Within that 50 km there are 178 scheduled monuments, distributed across Tiree, Coll, Iona, Mull, the Garvellachs, Colonsay and Islay. The relevant Islay assets are not incidental features. The applicant's own coastal character baseline describes the west coast of the Rhinns as rich in ancient monuments, and records forts at Dun Bheolain and Beinn a' Chasteil, standing stones at Ballinaby and a chapel at Kilchiaran, together with the remains of a chapel and an unmanned lighthouse on the offshore island of Orsay; on the northern coast it records the lighthouse at Ruvaal**.** Historic Environment Scotland identified likely significant effects on its historic environment interests. It advised that the proposed development was likely to affect the setting of a number of scheduled monuments, and in particular those of early Christian character whose cultural significance depends upon a sense of isolation, a position at the edge of the land and a relationship with the open sea. Among the assets it named were two on or immediately off Islay: Beinn a' Chaisteil promontory fort and associated remains (SM13213) on the north-west coast, and the monastic site, chapel, burial ground and associated remains on Nave Island (SM3233) identification of Dun Bheolain fort on Islay as a further asset likely to be significantly affected. On the recorded advice of the statutory adviser, the effect of this development upon the setting of at least one scheduled monument on Islay is capable of being fundamental, and capable of raising issues of national importance. That advice was given at

a stage when redesign was said to remain possible, and no redesign responsive to it appears on the record. If the Ministers find substantial harm to a designated asset, GEN 6 permits consent only exceptionally and only where the harm is outweighed by the benefits which the development is necessary to deliver, which returns the decision to the reduced weight properly attaching to the claimed benefit, and to the absence of any assessed benefit of local importance.

**The location, advice given and alternatives rejected:** The harm described is a function of two variables only: how far the turbines stand from the island, and how large they are. Both were the subject of express advice from the Scottish Ministers' own statutory adviser before this site was fixed, and both were the subject of alternatives which the applicant examined and rejected. The nearest turbines would stand approximately 15 km from Islay, which is under half the advised separation, and the tallest would reach 335 m, which exceeds the advised ceiling by more than two thirds. Reliance upon the [Sectoral Marine] Plan and the lease does not answer the objection as the is not the statutory marine plan for the purposes of the Marine (Scotland) Act 2010; and it is against that Scotland's National Marine Plan that these marine licence applications fall to be determined. The plan-level assessment which accompanied the Sectoral Marine Plan expressly deferred project-level scrutiny of effects to the consenting stage, which is this stage. And the grant of a seabed lease by Crown Estate Scotland confers no entitlement to consent; the Scottish Government's offshore wind ambition is itself expressly subject to rigorous project-level consenting and impact assessment. The two variables which produce the harm were both examined as alternatives, and both were rejected for a stated reason. The applicant has produced a chapter dealing with site selection and alternatives and the applicant's Without Prejudice Derogation Case sets out six Project Objectives against which alternatives were appraised. The sixth is to optimise the W1 Plan Option Area and maximise the generation capacity of the available Scottish seabed. Measured against those objectives, a reduced development area and a reduced number of turbines were both considered and both discounted.

The Community Council submits that where harm to a designated landscape is the consequence of a design choice made in preference to available and less harmful alternatives, that harm falls to be weighed as a chosen harm, and the second limb of Policy 4(d) becomes correspondingly harder to satisfy: benefits said to outweigh the harm must outweigh a harm which need not have been incurred at the level proposed. Beyond the five-metre adjustment already discussed, the EIAR identifies no mitigation of the seascape and visual effects on Islay. The Ministers are accordingly considering a proposal in which conceded significant adverse effects on a designated landscape area attract no mitigation at all.

**Islay and an affected island community:** The applicant's socio-economic consultants, BiGGAR Economics, recorded that there are potential impacts on habitability for island communities in particular. Habitability, in that context, means the capacity of an island to remain a place where people continue to live and work. Chapter 18 of the EIAR and its technical appendix do not then examine that question for Islay. Islay appears within the assessment, by reason of its potential role as a direct project location, that is, as a place where project activity might be based. It is not assessed as an affected island community whose exposure to the development has been measured. The employment and Gross Value Added benefits of the Project are quantified at Scotland and United Kingdom level, and at that level only. Not one of those figures is given for Islay, for the Inner Hebrides, or for Argyll and Bute.

The two coastlines which the applicant finds to be significantly affected are not empty ground. CCA 20 contains the settlements of Portnahaven and Port Wemyss, scattered farmsteads and houses, a distillery at Kilchoman near Machir Bay, and a coastline which the applicant itself records as a surfing venue at Machir Bay and as rich in ancient monuments. The island's economy rests on distilling, agriculture and tourism, and its visitor economy is founded on the coastal landscape, the birds and the beaches. Whether significant adverse change to those

coasts would affect the island's visitor economy, its businesses and its working population is precisely the question the applicant's consultants raised and which Chapter 18 of the EIAR does not answer. The Community Council notes the absence of assessment in line with Marine Directorate guidance to the effect that local study areas should reflect the appropriate impacts and be understandable to the communities they describe. A proposal which has not assessed the affected community cannot demonstrate that local and community benefit has been maximised. The local balance of benefit and harm is unquantified on both sides. ICC further invites Argyll and Bute Council to exercise its power under section 14 of the Act to request a retrospective island communities impact assessment of the Sectoral Marine Plan for Offshore Wind Energy.

*Officer comment: please see response in the Report of Handling in relation to Island Communities Impact Assessments.*

**The marine environment:** The Community Council adopts the representations of NatureScot, RSPB Scotland and the other specialist bodies so far as consistent with this objection and asks that substantial weight be given to that evidence.

**Commercial fisheries and displacement of fishing effort:** Fishing effort excluded from 448 km² of sea does not cease; it relocates. The consequences of relocation, being gear conflict and increased pressure on adjacent grounds, are borne by the same small fleets, and they are consequences which the applicant's own chapter identifies.

**Navigation, lifeline connectivity and safety at sea:** The applicant's shipping and navigation chapter assesses seven impacts. They include reduced access to local ports and harbours and a reduction of emergency response capabilities. The ferry services operated by Caledonian MacBrayne are among the navigational receptors identified, which is to say that the lifeline services upon which Islay depends for passengers and freight are within the assessed zone of effect. The Community Council draws attention to the scale of the vessel activity which would accompany the development, because it bears directly on both matters. On the applicant's realistic worst case the construction programme would involve 117 vessels and 5,699 vessel return trips over five years, with vessels assumed to be operating 24 hours a day within the development area, followed throughout the operational phase by some 423 vessel movements and 576 helicopter movements each year.

**Habitats regulations:** The applicant's Report to Inform Appropriate Assessment concludes that no adverse effect on the integrity of any European site would arise, and the applicant maintains that no derogation is required. In the same application, however, the applicant has lodged a Without Prejudice Derogation Case together with a Without Prejudice Guillemot Compensation Plan, both directed at a single feature of a single site: the guillemot of the North Colonsay and Western Cliffs Special Protection Area. Its stated reason for doing so is that the competent authority “may not reach the same conclusion” as the applicant. The applicant has judged it necessary to plan for a conclusion of adverse effect on the integrity of that site in respect of that feature. Where a well-advised promoter, in possession of the full survey and modelling record, considers that the competent authority may properly reach the opposite conclusion on the science, the question is not one from which reasonable scientific doubt has been excluded.

If the Ministers were to conclude that there would or might be an adverse effect on site integrity, consent could be granted only if three cumulative tests were satisfied: that there is no alternative solution, that there are imperative reasons of overriding public interest, and that the necessary compensatory measures are secured. The second concerns compensation. The applicant records that the Regulations governing compensatory measures came into force in May 2026 and apply to this Project, and that the Scottish Government's statutory guidance supporting those requirements has not yet been published. The Community Council

submits that the adequacy, deliverability and long-term security of any compensatory measure would require to be established on evidence before consent could be granted, and that the absence of the governing guidance is a matter the Ministers should weigh when considering whether that has been achieved.

**Claimed climate benefit:** the Project emits some 2.81 million tonnes of carbon dioxide equivalent more than the 'do nothing' scenario against which it is measured. The reported benefit of 2,851,685 tonnes is the result of subtracting the operational phase emissions alone, 1,904,549 tonnes, from the whole 35-year Do Nothing total of 4,756,234 tonnes. Construction, decommissioning and the transmission infrastructure, amounting together to 5,658,469 tonnes, or 75% of the Project's own footprint, are absent from one side of the comparison. Construction alone accounts for approximately 66% of the WDA's lifecycle emissions, and the applicant records that 88% of the construction figure is embodied carbon in materials. The applicant's own intensity figures disclose the same difficulty from a different direction, and this comparison is made on a consistent basis. Chapter 19 reports the whole Project's carbon intensity as 32.9 g $CO_2$e per kWh. The emission factor from which the Do Nothing baseline is constructed is 20.7 tonnes $CO_2$e per GWh, which is 20.7 g $CO_2$e per kWh. Per unit of electricity delivered, the Project as assessed is therefore more carbon-intensive than its own counterfactual, by a margin of approximately 59%.

The response also raises matters in relation to Raeshaw Farms Limited v Scottish Ministers; Aviation lighting and the night-time environment; other marine users, major accidents and pollution risk; climate resilience of the development itself; blue carbon; inter-related and combined effects and securing mitigation.

Islay Community Council requests that the Scottish Ministers **REFUSE** consent under section 36 of the Electricity Act 1989 and **REFUSE** the associated marine licence applications.

**2. CONCLUSION**

These matters do not raise any new concerns that have not already been addressed in the Report of Handling and PPSL Committee Report where relevant to the Council's areas of interest to this consultation response. On matters where other statutory consultees are better equipped to respond in terms of expertise, Argyll and Bute Council would defer to their advice to the Scottish Government Marine Directorate.

**Author of Report:** [Redacted] **Date:** 14.9.2026
**Reviewing Officer:** [Redacted] **Date:** 14.9.2026

[Redacted]
**Head of Development and Economic Growth**

# Machair Wind Farm Seascape, Landscape and Visual Review

Document no: B2340303/11
Version: 02

Argyll & Bute Council

Argyll & Bute Wind Farm SLVIA
31 August 2026



# Machair Wind Farm
# Seascape, Landscape and Visual Review

**Client name:** Argyll & Bute Council

**Project name:** Argyll & Bute Wind Farm SLVIA

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**Project no:** B2340303

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*Limitations/ Assumptions*

1. *The sole purpose of the report is to inform Argyll & Bute Planning Officers about the potential significant landscape and visual effects of the wind farm proposals.*
2. *The Section 36 Application documents sourced from the Applicant's website have been relied upon and presumed accurate in preparing the report, except where any inaccuracies or differences of opinion have been noted.*
3. *The assessments of likely significance not predicted in the EIAR but included in this report are provisional and based upon limited time and site survey and with further information may be subject to revision.*

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# Introduction

This review of seascape, landscape and visual effects of the proposed wind farm has been undertaken by Argyll and Bute Council's consultant landscape architect, Jacobs. It has been based on examination of the Environmental Impact Assessment Report (EIAR) and in particular the Seascape, Landscape and Visual Impact Assessment (SLVIA) in Chapter 16 accompanying the Section 36 application 00012385 and submitted 25th June 2026, a site visit to Islay and knowledge of the area surrounding the proposal gained from previous visits.

## ▪ Description of proposals

The proposal is located within the W1 Plan Option Area in the Atlantic waters west of the Inner Hebrides. The windfarm development area (WDA) lies predominantly within an open marine environment near Islay, Jura, Colonsay and Mull, with the nearest coastline located on Colonsay, approximately 12.4km to the east. The surrounding seascape is characterised by a complex arrangement of islands, skerries, sounds and channels, which include several nationally and locally designated landscapes.

The WDA covers approximately 448km$^2$, with water depths ranging from approximately 21.6m to 81.7m below Lowest Astronomical Tide (LAT).

The principal components of the proposal comprise:

- Up to 144 offshore wind turbine generators (WTGs);
- Inter-array cabling connecting turbines within the WDA;
- Fixed-bottom offshore substation platforms and associated infrastructure;
- Offshore export cables with associated protection;
- Fixed-bottom foundations with associated scour protection;
- Fibre optic communications cables integrated or bundled with the offshore cables.

The project has been assessed using a design envelope comprising of two realistic worst-case scenarios:

- Up to 144 WTGs with a maximum blade tip height of 280m above LAT;
- Up to 91 WTGs with a maximum blade tip height of 335m above LAT.

These scenarios have been assessed for the purposes of the EIAR and SLVIA.

The proposal also includes aviation lighting on selected turbines in accordance with aviation safety requirements, the effects of which have been considered within the SLVIA.

The WDA is not located within any nationally or locally designated landscape. However, there is theoretical visibility that extends to several designated landscapes including the Jura National Scenic Area (NSA), Loch na Keal, Isle of Mull NSA, and Scarba, Lunga and the Garvellachs NSA, as well as several Argyll and Bute Local Landscape Areas (LLAs). Potential visibility from sections of the Ben More, Mull Wild Land Area (WLA) and Jura, Scarba, Lunga and the Garvellachs WLA has also been identified within the assessment.

## ▪ Information submitted by the Applicant

The SLVIA set out in Chapter 16 appears to generally accord with the Guidelines for Landscape and Visual Impact Assessment Third Edition and other best practice for wind farm assessment. The Coastal Character Baseline and Assessment presented in Appendix 16.3 also appears to accord with NatureScot's Coastal Character Assessment – Guidance Note. The SLVIA is supported by a range of technical appendices, figures, wirelines, photomontages and ZTV analysis.

The landscape assessment is generally comprehensive and provides a substantial body of information from which to review the likely seascape, landscape and visual effects of the proposal. Whilst we agree with most of the landscape assessment conclusions, several judgements relating to magnitude and significance of effects appear somewhat conservative, particularly where the proposal influences perceptions of remoteness, wildness and the relationship between the landscape and sea. These are discussed further in the relevant sections of this review.

We have not agreed with all of the visual assessment and relevant commentary regarding this is presented in the visual assessment section.

he visualisations generally appear to accord with current best practice guidance and provide a reasonable representation of the proposal.

However, the ZTVs supplied in the ES Figures are extremely difficult to read due to the similarity between the faint yellow tint of the areas with most turbines visible and areas of no visibility which do not have a tinted background. Additionally, the main ZTV is not of a quality that detailed examination of visibility can be reviewed. More detailed ZTV information of the ZTV is supplied in the inset maps with the viewpoint figures, but these do not cover the entire Study Area, only the areas around the viewpoint locations. Consequently, it is impossible to establish the exact location of theoretical visibility accurately across the whole Study Area.

The assessment includes consideration of designated landscapes, landscape and coastal character, visual effects, aviation lighting effects and cumulative effects. Wirelines and photomontages have been provided for 30 viewpoints, which generally present a robust base of evidence from which to review the assessment. It is noted that photomontages of Viewpoints 18 (Scarba) and 24 (Staffa) have not been included within Appendix 16.4. Whilst accompanying wirelines are included, the absence of photomontages limits the ability to fully review the visual effects predicted from these locations and verify the findings in the assessment.

There are several presentational issues, inconsistencies and matters requiring clarification that have been identified through this review and are discussed in the relevant sections below.

## ▪ Scoping

A turbine layout comprising up to 147 WTGs on fixed foundations with blade tip heights of 260m (smallest) or 340m (largest, 88 turbines), on a site of 510km$^2$ formed the basis of the EIA Scoping Report submitted to the Scottish Government in September 2024. Two public exhibitions were held, the first in Summer 2025 and the second in Autumn 2025.

Relevant extracts of Argyll and Bute Councils Scoping Opinion are summarised as follows:

- *It is noted from the Scoping Report that the potential effects of the proposed development on landscape character and visual amenity will be assessed through a Landscape and Visual Impact Assessment (LVIA), which will follow GLVIA, 3rd Edition and NatureScot advice/guidance on good practice for landscape and visual assessment of wind farm proposals. This is agreed as appropriate guidance for the assessment. All elements of a development are important to consider within any EIAR.*
- *it is welcomed that number of viewpoints as suggested by the local communities have been included in the methodology for the SLVIA.*
- *The boundary of 30km should be extended to include the Southwest and South and East LLAs of Islay which fall within the ZTV at distances of 30km to 40km.*
- *We are satisfied that all relevant consultees have been engaged. We would defer to the expertise of NatureScot on Seascape matters.*

NatureScot's Scoping Opinion notes that:

- *Whilst the Jura, Scarba, Lunga and the Garvellachs Wild Land Area (WLA 05) is proposed to be scoped out of the assessment, we consider that there is a clear commonality between some Special Landscape Qualities (SLQs) of the Jura National Scenic Area (NSA) and Wild Land Qualities (WLQs) of WLA 05, with WLQs providing additional information and context for the SLQs. Therefore, we advise that the relevant WLQs of WLA 05 be drawn upon to inform the assessment of effects on special landscape qualities (AESLQ).*
- *we would advise that viewpoint 10, representative of the west coast of Jura, be in visualisation format. This viewpoint should be sited further east to ensure that effects on the location specific SLQ of the inaccessible Loch Tarbet16 be captured. This would also facilitate easier access for site viewpoint photography.*
- *In relation to capturing impacts on landscapes of National Importance, we are content that all relevant receptors have been identified.*
- *Based on the information provided, we would reiterate our previous advice (email sent 23 May 2024) and recommend that a 40km radius landscape and coastal character study area be adopted. This is due to the proposed height of the turbines currently being considered, at 340m to blade tip above LAT, and the subsequent pattern of visibility over sensitive coastal landscapes*
- *We would like to take this opportunity to highlight that there could be cumulative impacts with the Haven Offshore Array wind farm proposal in Irish waters and this should be considered within the CEA.*
- *We would like to take this opportunity to reiterate concerns raised in our advice dated 23 August 2023 and 23 May 2024 regarding design considerations as follows:…*
    - *3 national scenic areas (NSA's) curve around the north and east sides of W1. Achieving moderate amounts of theoretical visibility, at similar distances c. 30km which while distant,*

*given the large size of the proposed turbines and the nature of sea views with little screening, (height of turbines over topping Colonsay potentially?) causes us some concern;*

- *The special qualities highlight the frontier character, open Atlantic views, vast natural world and outstanding views and distances over which these views can be obtained and strong maritime influence on these protected landscapes;*
- *Distinctive, strong, and diverse coastal character; and*
- *Proximity to Islay and Colonsay with sensitive visual and landscape receptors.*

- *It states in Paragraph 832 that the Applicant intends to confirm the final layout design post consent based on the findings of pre-construction surveys. We advise that where significant effects are identified, these should be resolved as far as possible through adequate consideration of mitigation options as part of the application process and not post-consent.*

The SLVIA reports that post-scoping consultations were undertaken with a number of community councils, NatureScot and Argyll and Bute Council to further agree the viewpoints and several aspects of the assessment.

## Design evolution

Chapter 4: Site Selection and Alternatives, describes an iterative process that has been undertaken to refine the WDA and reduce and mitigate potential environmental effects. The proposal is located within the W1 Plan Option Area (POA) which was identified through the Scottish Governments Sectoral Marine Plan for Offshore Wind Energy. Prior to the adoption of the Sectoral Marine Plan, the size of the POA was reduced to lower potential visual impacts and increase the distance from land.

Following the ScotWind Award in 2022, further potential constraints were reviewed by the Applicant within the Option Agreement Area (OAA), that resulted in a reduction from approximately 754m$^2$ to 510km$^2$ for the EIA Scoping WDA. There were numerous factors informing the refinement, including seascape, landscape and visual considerations, notably *a minimum buffer of 12km from Colonsay and 15km from Islay* to reduce these effects.

Following the Scoping Opinion, further constraints were identified through several workshops/webinars, which were undertaken alongside stakeholder and statutory consultation events held on Colonsay, Islay, Jura, Ross of Mull and Iona. The consultations resulted in a reduction of the WDA to 448km$^2$, equivalent to a 12% reduction in total area. This is illustrated by Figure 4.8 in Chapter 4.

The key design changes to the seascape, landscape and visual impacts were as follows:

- Reduction in the northern boundary to reduce the horizontal spread of the WTG lessening the effects on sensitive views, including views towards Dubh Artach Lighthouse from Mull and Iona.
- Reduction of the eastern boundary (0.4km) following consultation feedback regarding seascape, landscape and visual effects on nearby islands communities, increasing separation distance between the WDA and the coast.
- Removal of the southern extent of the Scoping WDA to reduce the horizontal spread of turbines and minimise potential effects on Islay, Colonsay, Jura and nearby National Scenic Areas (NSAs).

In addition to the refinement of the WDA boundary, the Applicant prepared a design strategy in collaboration with NatureScot. This strategy establishes a series of landscape and visual design objectives intended to minimise likely significant effects on the Special Landscape Qualities (SLQs) of the Jura, Loch na Keal (Isle of Mull) and Scarba, Lunga and Garvellachs NSAs. There are four themes that comprise the objectives, which include *Project Scale*, *Project Extent and Orientation*, *Turbine Layout* and *Location Specific Measures*. Collectively these aim to reduce the apparent scale and visual influence of the proposal, whilst recognising some seascape, landscape and visual change is inevitable. The design strategy (outlined in Appendix 15) acknowledges that design development is an ongoing process and that the design objectives will continue to inform refinement of the final turbine layout during post-consent stage, in consultation with NatureScot as required.

Overall, the design evolution demonstrates that seascape, landscape and visual considerations have informed the development of the project throughout site selection and refinement process. Whilst these measures are likely to have reduced the extent of the effects, significant residual effects remain for several landscape, seascape and designated landscape receptors identified within the SLVIA.

## ▪ Landscape effects

There would be no direct effect on landscape elements or features as the proposal would be located offshore. The assessment acknowledges any effects on the landscape receptors would be perceptual and occur because of changes to outward sea views during both construction and operation phase. Effects on landscape character during construction phase are predicted to be short term and reversible, with those in the operation phase long term, reversible and adverse. The sensitivity for each of the landscape receptors has been evaluated as *high*. The assessment for each LCT is in section 16.10.1.1 and the summary is presented in table 16.66 of the SLVIA (Chapter 16).

We agree with most of the conclusions presented within the SLVIA in relation to effects on LCTs, with the assessment generally supported by the ZTV analysis, viewpoint assessment and visualisations. However, there are locations where the magnitude of impact appears conservative, particularly LCT 42 (Rocky Moorland - Argyll) south of Loch Gorm and LCT 35 (Rugged Mountains) on Jura. In these instances, the extent of visibility and the influence of the proposal on perceptual characteristics such as wildness, remoteness, openness and the relationship with the sea would justify higher magnitude and significance judgements than those presented in the assessment.

For LCT 42 (Rocky Moorland) the SLVIA assesses the magnitude of impact from the coastal edge and hills northwest of Loch Gorm as high, reducing to medium on the hills south of Loch Gorm and low elsewhere. On review a medium magnitude of impact south of Loch Gorm appears somewhat conservative during both construction and operation phases. While the assessment identifies a reduction in the scale of change from large to medium for these areas, the ZTV (Figure 16.12) indicates extensive visibility from the coastal edge and adjoining hills. The assessment also acknowledges the proposal introduces a notable new offshore feature across the northwest seaward horizon and influence perceptual qualities associated with the remote character of the landscape. Although offshore views are not specifically identified within the description of the LCT, the *exposed and windswept* character of the landscape, its *rocky coastline* and presence of isolated farms all contribute to a strong sense of remoteness and close relationship with the sea. This is illustrated in Figure 16.2.3a-l (Appendix 16.4). Given the extent of visibility, alongside the scale of the proposal and influence on these characteristics, it is unclear why the magnitude of impact reduces immediately south of Loch Gorm. We consider that the magnitude of impact (and therefore significance of effect) has been underestimated.

On review, the low magnitude of impact would appear conservative for LCT 35 (Rugged Mountains) units on Jura during both construction and operation phase. As illustrated from Viewpoint 11 (Beinn an Oir) in Figures 16.2.11b (appendix 16.4) and the ZTV analysis presented in Figure 16.12, the proposal would be visually prominent over a wide arc of view northwest. As such the turbines would influence the *strong wilderness qualities* of the LCT and as such a medium magnitude of impact resulting in **moderate** and **significant** effect, would be appropriate to the Jura units.

## ▪ Seascape Effects

There would be no direct effect on the coastal character areas (CCA) as the proposal would be located offshore, between 10-20km from the nearest CCA. Other than CCA 21 – Loch Indaal, Islay which is evaluated to be of medium sensitivity. All other CCAs have been evaluated to be high sensitivity. The assessment for each CCA is in Appendix 16.3 and supported by the ZTV analysis in figure 16.12 of the SLVIA (Chapter 16). In addition, a summary of potential effects during construction, operation and maintenance and decommission is presented in table 16.66 of Chapter 16.

Whilst we agree with the findings in much of the CCA assessment and consider it to be comprehensive and generally accord with the relevant guidance, we consider that the assessment underestimates the magnitude of impact and significance of effects on several CCAs, particularly where the proposal would influence key characteristics that relate to remoteness, wildness and openness and the relationship between the coast and the sea.

For CCA 7 – Ross of Mull, the assessment of a medium magnitude of impact, resulting in a moderate level of significance appears conservative. The ZTV (Figure 16.12) indicates extensive visibility along the southern coastline, particularly the western extent. Viewpoint 20 – Erraid, Mull which illustrates the scale of change that would be experienced from these areas and demonstrates that the proposal would become a notable feature in sea views. We consider that the assessment underestimates the scale of change. This is particularly relevant in relation to the key characteristics associated with *wildness* and *long views south across the Sea of the Hebrides*. Given the extent of visibility and the influence of the proposal on these characteristics, a high magnitude of impact, resulting in a **major** significance of effect, would be appropriate.

There appears to be an error for the assessment of CCA 14 – Rubha an t-Sailein to Glendebadel Bay, Jura. The assessment states the *area predominantly faces east and northeast*. However, the coastline is orientated west and northwest towards Islay and Colonsay.

For CCA 15 - Loch Tarbert, Jura, the assessment (Appendix 16.3, Table 2.24) of a medium magnitude of impact resulting in a **moderate** significance of effect appears conservative. The assessment does acknowledge the proposal would be visible across much of the western end of the CCA and would introduce *a notable new feature into views towards the open sea*. It also recognises that the proposal would *detract from the sense of wildness and the lack of modern human influence experienced in this area of coastline* and that *the channelled views along the loch towards the open sea would be affected*. These effects relate directly to several of the key characteristics of the CCA, including its orientation towards the sea, *dramatic seaward vistas* and *strong sense of remoteness.* Given the wide arc of view at the western end of the CCA, and the assessments acknowledgement that *in some views the turbines will fill the sound*, we consider that a high magnitude of impact and **major** significance of effect, would be appropriate. There is no reference in the assessment to Viewpoint 10 (Loch Tarbert, Jura) Which emphasises the scale of change the proposal would introduce to western views across the Atlantic from the CCA.

The colours used to delineate CCA 17 – Sound of Jura and LCT 55 - Coastal Parallel Ridges are very similar in Figure 16.12, making it difficult to distinguish between the two and accurately interpret the area under assessment. Consideration should be given to revising the colour palette to improve legibility and provide greater clarity regarding the extent of the CCA.

For CCA 18 – Sgairail, Islay, we consider that the magnitude of impact would be high, rather than medium, increasing the significance of effect from **moderate** to **major**. The proposal would be located predominantly within 20km of the CCA and, according to the ZTV analysis (Figure 16.12), would be visible across much of its

extent. Given the scale of the development, the extent of visibility and long- term nature of the effects, the degree of change to the CCA may be greater than reflected in the assessment. The introduction of the proposal has the potential to influence key characteristics, such as *strong sense of wildness* and *Expansive views towards the open sea and the islands of Oronsay, Colonsay, Mull and Jura*, the latter for which is noted.

For CCA 20 – Ardnave Point to Rhinns Point, Islay, the assessment of a medium magnitude of impact, and **moderate** significance of effect, appears conservative. The assessment (Appendix 16.2, Table 2.30) acknowledges that the proposal would be visible along most of the CCA and would affect multiple key characteristics, including the sense of being *at the outer edge of the British Isles* and *Open views out to the Atlantic Ocean*. The assessment also identifies a large geographical extent of effects and notes that the proposal would occupy a very wide horizontal angle of view of up to 71 degrees. It is also notable that the assessment of visual effects experienced at Viewpoints 1 (Ardnave Point), 2 (Saligo Bay) and 4 (Creag Bealach na Caillich), which are representative of views experienced along the CCA, are all assessed as being of **major** and **significant**. Given the widespread visibility of the proposal, its influence on multiple key characteristics and the large geographical extent, we consider that the overall magnitude has been underestimated and a high magnitude of impact and **major** and **significant** of effect would be appropriate.

## ▪ Landscape designations

Landscape planning designations and WLAs within the SLVIA 60km Study Area are illustrated in Figures 16.13 and 16.14 in Chapter 16. A ZTV analysis, in conjunction with desk and field-based research, was used to determine which designated landscapes and WLAs may be scoped out of assessment because they are unlikely to experience significant effects. In agreement with statutory consultees six landscape designations were scoped into the SLVIA and have been assessed in detail in Appendix 16.2 and section 16.10.1.5 of the SLVIA. In addition, a study area of 40km for assessment of effects on landscape (LCT) and seascape (CCA) receptors as identified in the assessment methodology in Appendix 16.1 was agreed with NatureScot and Argyll and Bute Council. The SLVIA states that beyond 40km, effects on landscape designations are unlikely to be significant and this has been based on professional judgement and experience. The landscape designations within the assessment are listed below:

- the Jura NSA located approximately 25km southeast of the proposal;
- the Loch Na Keal, Isle of Mull NSA located approximately 31km northeast of the proposal;
- the Scarba, Lunga and the Garvellachs NSA located approximately 42km west of the proposal;
- the North and West Islay (Coast) LLA located approximately 15km southwest of the proposal;
- the Central, South and West Mull LLA located approximately 20km northeast of the proposal; and
- the Jura LLA located approximately 30km east of the proposal.

The landscape designations scoped out of the report include:

- the Knapdale NSA located approximately 45km east of the proposal. Scoped out due to the reduced perceptibility of the proposal at this distance;
- the Southwest Islay LLA, where the ZTV indicates theoretical visibility along northwest coastline located over 30km from the proposal. Scoped out due to significant effects considered unlikely;
- the South and East Islay LLA, where the ZTV indicates theoretical visibility on higher ground between 35-40km from the proposal, but not the coastline. Scoped out as significant effects are considered unlikely;
- the Knapdale/Melfort LLA, where the ZTV indicates theoretical visibility from the northern part of the LLA, at over 50km from the proposal. Scoped out as significant effects are considered unlikely;
- the Jura, Scarba, Lunga and the Garvellachs WLA which is predominantly over 30km from the proposal. Scoped out as significant effects on wild land attributes and qualities are not anticipated. The key qualities and attributes of the WLA have been used to inform the assessment of effects for the SLQs of the Jura NSA;
- the Ben More, Mull WLA is located at over 40km from the proposal. Theoretical visibility has been assessed as limited to the higher ground and as such has been scoped out as significant effects on wild land attributes and qualities are not anticipated. The key qualities and attributes of the WLA have been used to inform the assessment of effects for the SLQs of the Loch na Keal NSA.

**Jura NSA**

The Jura NSA is located approximately 25km southeast of the proposal at its closest point and includes the southern half of Jura. Figure 16.2.1 in Appendix 16.2 illustrates the blade tip and hub height visibility of the proposal from within the NSA. Areas within the NSA, from where turbines would be theoretically visible, range

in distance from 26km to 40km. The ZTV pattern reflects the underlying topography of the NSA, with the visibility primarily associated with elevated ground, western coastal areas and southern summits.

Viewpoints 10 (Loch Tarbert, Jura) and 11 (Beinn an Òir, Jura) are located within the NSA. Wirelines are provided in Appendix 16.4, (Figures 16.2.10a-d and 16.2.1a-e respectively). Viewpoint 10 is located approximately 34km from the proposal and is representative of views from the west coast of Jura towards Islay and Colonsay. Viewpoint 11 is located approximately 33km from the proposal and represents views experienced from the highest summit of the Paps of Jura.

An assessment of the effects on the Special Landscape Qualities (SLQs) of the Jura NSA is included within Appendix 16.2 It identifies five of the NSA's eight SLQs as having some potential to be affected by the proposal and assesses in detail. These SLQs include:

- *The distinctive Paps of Jura;*
- *A continually varying coast;*
- *Large tracts of wild land;*
- *An Island close yet remote; and*
- *The inaccessible Loch Tarbert.*

The remaining three SLQs are assessed as not experiencing significant effects:

- *Human settlement on the margins;*
- *The raised beaches of the west coast;* and
- *An Island of deer.*

The assessment states that the SLQs primarily relate to the physical and perceptual characteristics of the landscape. Effects are predicted to arise from the introduction of the proposed turbines and associated aviation lighting into views experienced from parts of the NSA, particularly the northwestern coastline and southern summits, with limited to no visibility from eastern areas.

The assessment concludes that the effects on the SLQs *The distinctive Paps of Jura, Large tracts of wild land* and *The inaccessible Loch Tarbert* would be significant and moderate, with *A continually varying coast* and *An island close yet remote* determined to be not significant and minor.

On review, for the SLQ *The distinctive Paps of Jura,* the assessment conclusion appears conservative. While the proposal would not affect the physical characteristics of the Paps, or their status as prominent landmarks, the assessment acknowledges that it would influence the *unparalleled views to the Inner Hebrides, the Mull of Kintyre and beyond* which form an integral component of the SLQ. Viewpoint 11 demonstrates that the proposal would occupy a notable portion of the northwest horizon and become a noticeable new feature within outward views from the summits of the Paps. Given the importance of the experience of the panoramic views, we consider a medium magnitude of impact and **moderate** and **significant** of effect within the SLVIA to be underestimated and a high magnitude of impact and a **major** and **significant** effect would be appropriate.

For the *An island close yet remote* SLQ, whilst the proposal would not affect the physical remoteness of Jura, it would influence perceptions of remoteness through the introduction of large-scale offshore infrastructure into views currently characterised by a strong relationship between the island and a largely undeveloped seascape. As remoteness is a fundamental component of this SLQ, we consider that the low magnitude of

impact and minor (not significant) effect identified within the SLVIA is an underestimate and a medium magnitude of impact, resulting in a **moderate** and **significant** effect, would be appropriate.

**Loch Na Keal, Isle of Mull NSA**

The Loch Na Keal NSA is located approximately 31km northeast of the proposal at its closest point. Figure A16.2.2 in appendix 16.2, illustrates the blade tip and hub height visibility of the proposal from within the NSA. Areas within the NSA, from where turbines would be theoretically visible, range in distance from 31km to 53km. The ZTV pattern reflects the underlying topography of the NSA, with the visibility primarily associated with elevated ground, notably the summit of Ben More; and southern coastal areas of Mull, Ulva Staffa, Gometra and the Treshnish Isles.

Viewpoints 24 (Staffa), 25 (Ulva), 26 (B8085 Mull), 27 (Ben More, Mull) and 28 (Cruachan Treshnish Cairn, Mull) are located within the NSA. Wirelines within the NSA are included in Appendix 16.4, (Figures 16.2.24a-c, 16.2.25a-d, 16.2.26a-d, 16.2.27a-d and 16.2.28a-d respectively).

Viewpoint 24 is located approximately 36km from the proposal and is representative of views experienced by visitors to the island. Viewpoint 25 is located approximately 44km from the proposal and represents views from the footpath network on the southern side of Ulva. Viewpoint 26 is located approximately 47km from the proposal and is representative of views experienced by road users. Viewpoint 27 is located approximately 45km from the proposal and represents views from the summit of Ben More, while Viewpoint 28 is located approximately 49km from the proposal and is representative of views experienced by recreational receptors elsewhere within the NSA.

An assessment of the effects on the Special Landscape Qualities (SLQs) of the Loch Na Keal NSA is included within Appendix 16.2. It identifies five of the NSA's nine SLQs as having some potential to be affected by the proposal and assesses in detail. These SLQs include:

- *Highly distinctive seaways and shores;*
- *A voyage from enclosed sea loch to the open Atlantic;*
- *Views of an island-studded sea;*
- *A vast natural world, dwarfing human settlement;* and
- *World famous Staffa and Fingal's Cave.*

The SLQs that have been determined would not have significant effects include:

- *Dramatic coast of basalt terraces and cliffs;*
- *Islands and islet groups of astonishingly varied character;*
- *The horizontal Treshnish Isles;* and
- *The instantly recognisable Dutchman's Cap*

The assessment concludes that the effects on all the scoped in SLQs would be minor and not significant.

On review, the SLQ *A voyage from enclosed sea loch to the open Atlantic*, the assessment of a low magnitude of impact and minor significance of effect appears conservative given that the proposal would be experienced during the voyage that defines this SLQ. Although the development would be viewed at considerable distance, the introduction of a large-scale offshore wind farm into seaward views has the potential to alter the perception of openness that contributes to the transition from enclosed sea loch to open Atlantic. We consider that a medium magnitude of impact and **moderate** and **significant** effect would be appropriate.

For the SLQ *Views of an island studded seascape*, the assessment concludes a low magnitude of impact resulting in a minor significance of effect. On review, this judgement appears conservative. Whilst the proposal would not directly affect the physical characteristics that underpin the SLQ, including the islands or coastline it would introduce a large-scale man-made feature into views across the seascape. The primary focus of this SLQ is not only the physical presence of the islands, but also the experience of the *island studded seascape*. ZTV mapping indicates that receptors travelling through the seascape would experience clear views of the proposal, while receptors on land would experience visibility from elevated locations within the NSA. Although the proposal would generally be viewed at considerable distance and may be partially screened from some locations, it would nonetheless alter the visual character of the seascape and the way in which this SLQ is experienced. On this basis, a medium magnitude of impact would be appropriate, resulting in a **moderate** and **significant** effect.

For the SLQ, *World famous Staffa and Fingal's Cave*, the assessment of a low magnitude of impact resulting in a minor significance appears conservative. While the proposal would not affect the physical or wildlife characteristics of the SLQ, the assessment acknowledges that it would influence the perception of Staffa as an *isolated* and *remote* island and affect the *wide and grand vista across the sea*, particularly in views towards the *Ross of Mull, Iona and Dun I.* These qualities form an important part of the *all-round* visitor experience described in the NSA citation. A new man-made feature would be introduced to these outward views southwest and has the potential to influence more the appreciation of the island's remoteness and seascape setting. The absence of a photomontage for Viewpoint 24 (Staffa) makes it difficult to fully verify the assessments conclusion regarding the scale of change from this location. However, we consider it likely that a medium magnitude of impact and **moderate** and **significant** effect would be appropriate.

For the SLQ, *A vast natural world, dwarfing human settlement,* the assessment of a low magnitude of impact appears conservative. While the proposal would not affect the physical characteristics of the landscape, the assessment acknowledges it would detract from the perception that nature dominates the area apparently mostly unaffected by humans. This is closely aligned with several of the key attributes of the Ben More, Mull WLA, including *high sense of remoteness, high sense of naturalness* and *sense of awe.* Viewpoint 27 (Ben More, Mull), illustrates that, despite the distance, the proposal would remain a highly perceptible and large-scale manmade feature on the horizon. Considering the importance of perceptual qualities to both the SLQ and WLA attributes, we consider a medium magnitude of impact, resulting in a **moderate** and **significant** effect to be appropriate.

**Scarba, Lunga and the Garvellachs NSA**

The Scarba, Lunga and the Garvellachs NSA is located approximately 41km northeast of the proposal at its closest point. Figure A16.2.3 in appendix 16.2, illustrates the blade tip and hub height visibility of the proposal from within the NSA. Areas of theoretically visibility are reported to occur at distances ranging from 41km to 51km. The ZTV pattern reflects the underlying topography of the NSA, with the visibility primarily associated with the western coastline and elevated ground.

Viewpoints 18 (Scarba) is located within the NSA. Wirelines within the NSA are presented in Appendix 16.4 (Figures 16.2.18a-c) Viewpoints 17 (Oban-Colonsay Ferry) and 19 (Cnoc Dhomnuill, Luing) were also used to inform the assessment but sit outside the NSA boundary. Wirelines for these viewpoints are in 16.2.17a-d and 16.2.19a-d respectively. Viewpoint 17 is located approximately 38km from the proposal at its closest point recreational and transport (ferry passengers). Viewpoint 18 is located approximately 47km from the proposal and is representative of views experienced by recreational receptors exercising access rights within the NSA. Viewpoint 19 is located approximately 54km from the proposal and represents views experienced by recreational receptors at a summit location.

An assessment of effects on the Special Landscape Qualities (SLQs) of the Scarba, Lunga and the Garvellachs NSA is provided in Appendix 16.2. The assessment identifies two of the NSA's nine SLQs as having the potential to be affected by the proposal and assesses these in detail. These comprise:

- *Uninhabited, remote, wild islands; and*
- *A seascape of distinctive and contrasting island groups*

The SLQs that have been determined would not have significant effects include:

- *Solitude, sanctuary, reflection and retreat;*
- *Exceptional marine life;*
- *The notorious Corryvreckan and the Grey Dogs;*
- *The pyramidal island of Scarba;*
- *The irregularly-shaped Lunga, and its attendant islands and reefs;* and
- *The low-lying slate island of Belnahua.*
- *The sloping and rocky Garvellachs*

The assessment concludes that the effects on all the scoped in SLQs would be minor and not significant.

For the SLQ *Uninhabited, Remote, Wild Islands,* the assessment's conclusion of a low magnitude of impact appears conservative. Although the proposal would not alter the physical characteristics of the islands, it would affect the way in which they are experienced and appreciated. Viewpoint 19 (Cnoc Dhomnuill Luing) demonstrates that the proposed turbines would form a notable backdrop in outward-facing sea views, introducing a substantial human-made influence into a landscape valued for its remoteness and wild character. Given that these perceptual qualities are central to the SLQ, a medium magnitude of impact may be more appropriate, resulting in a **moderate** and **significant** effect.

**North and West Islay (Coast) LLA**

The North and West Islay (Coast) LLA is located approximately 15km southeast of the proposal at its closest point. As no published statement of special qualities has been produced by Argyll and Bute Council, the SLVIA uses the key characteristics of the Landscape Character Types (LCTs) for defining the areas valued qualities. These include LCT 41: Plateau Moorland, LCT 42: Rocky Moorland, LCT 48: Lowland Bog and Moor, LCT 49: Island Mixed Farmland and LCT 58: Sand Dunes and Machair. LCT 48 mostly lies outside the LLA.

The viewpoints located within the LLA include Viewpoint 1 (Ardnave Point, Islay), Viewpoint 2 (Saligo Bay, Islay), Viewpoint 4 (Creag Bealach na Caillich, Islay) and Viewpoint 5 (Minor Road nr Porthaven, Islay). Corresponding wirelines are presented in Appendix 16.4 (Figures 16.2.1a-f, 16.2.2a-f, 16.2.4a-f and 16.2.5a-g).

The SLVIA concludes that there would be no direct effects on the LLA, as the proposal would be located approximately 15km and 30km from the designation boundary in offshore waters, with effects limited to changes in views and the resulting influence on the *perceptual characteristics of the landscape*.

The SLVIA identifies significant effects, (up to **major**), are predicted to arise from the introduction of the proposed wind turbines and associated aviation lighting. The assessment notes potential impacts on qualities associated with the remoteness and wildness characteristic of the landscape, making note of the relationship between the rugged coastline and the open sea. Effects are also identified in relation to the rural character of the inland landscape and its historic qualities.

We would agree with the judgements made in the assessment and the overall significance of up to **major**. The proposal would be visible for the majority of the LLA, with some small, isolated areas completely screened by the topography. The conclusions for magnitude also generally appear accurate for the LCTs.

**Central, South and West Mull LLA**

The Central, South and West Mull LLA is located approximately 20km northeast of the proposal at its closest point. The designation adjoins the Loch na Keal, Mull NSA and encompasses part of the Ben More, Mull WLA. The SLVIA uses the key characteristics of the Landscape Character Types (LCTs) for defining the areas valued qualities. The LCTs include LCT 35: Rugged Mountains, LCT 44: Boulder Moors – Argyll, LCT 45: Stepped Cliffs and Terraces, LCT 49: Island Mixed Farmland and LCT 50: Stepped Rocky Coastlands.

Viewpoints located within the LLA include Viewpoint 20 (Erraid, Mull), Viewpoint 21 (Mull-Iona Ferry), Viewpoint 22 (Dun I, Iona) and Viewpoint 23 (Carsaig Bay, Mull). In addition, viewpoint wirelines within the NSA are included in Appendix 16.4, (Figures 16.2.20a-d, 16.2.21a-g, 16.2.22a-d and 16.2.23a-d respectively).

The SLVIA concludes that there would be no direct effects on the LLA, as the proposal would be located approximately 20km and 50km outside the designation boundary in offshore waters, with effects limited to changes in views and the resulting influence on the *perceptual characteristics of the landscape*.

The assessment identifies significant effects *(*up to **major***)* are predicted to arise from the introduction of the proposed wind turbines and associated aviation lighting. These effects are primarily associated with changes to views seaward and resulting effects on qualities of *remoteness and wildness* that are characteristic of the landscape. The assessment also notes a perceived contrast between the proposed development and *the low-lying rocky coast and offshore islands* and the predominantly *rural nature of the landscape and its historic character.* Significant effects are predicted to *occur within approximately 20-30km* of the proposal.

Overall, we agree with the assessment's conclusions regarding the magnitude of impact and the overall significance of effects, which are assessed as up to **major**.

**Jura LLA**

The Jura LLA is located approximately 30km to the east of the proposal at its closest point. The designation encompasses the northern part of Jura, adjoining the Jura NSA to the south and including parts of the Jura, Scarba, Lunga and Garvellachs WLA. As no published statement of special qualities has been produced by Argyll and Bute Council, the SLVIA uses the key characteristics of the Landscape Character Types (LCTs) for defining the area's valued qualities. These include LCT 41: Plateau Moorland – Argyll and LCT 55: Coastal Parallel Ridges.

Viewpoint 12 (An Cruachan, north Jura) is the only viewpoint located within the LLA and is supported by photomontages and wireline visualisations presented within Appendix 16.4 (Figures 16.2.12a-d).

The SLVIA concludes that there would be no direct effects on the LLA, as the proposal would be located approximately 30km and 50km outside the designation boundary in offshore waters, with effects on the LLA limited to changes in views and the resulting influence on the *perceptual characteristics of the landscape*.

The SLVIA concludes that effects on the assumed qualities of the LLA would not be significant and would be of no more than minor significance. It identifies potential effects arising from the introduction of the proposed turbines and associated aviation lighting, particularly in relation to qualities of *remoteness and wildness* that contribute to the character of the landscape. The assessment mentions that these effects would largely be experienced in views out towards the sea, beyond or alongside the Isle of Colonsay, between approximately 30-47km away.

The SLVIA further notes that visibility of the proposal would be partially screened by Colonsay and that while the turbines would introduce a new man-made element that contrasts with the low-lying and rugged character of the landscape, key views towards the Jura NSA in the south, that includes the Paps of Jura, and east towards the sound of Jura would remain unaffected.

Overall, we agree with the assessment's conclusions regarding the magnitude of impact and the overall significance of effects, which are assessed as *minor, not significant*. Given the distance of the proposal from the LLA, the screening influence of Colonsay and the limited extent of visibility identified within the ZTV, the conclusion appears reasonable.

# Visual effects

## Viewpoint Assessment

The SLVIA assesses 30 viewpoints spread across an area up to 60km from the WDA and predicts either Moderate or Major **significant** effects at 16 viewpoints. The viewpoints assessed in the SLVIA are considered in broad island area groupings and the following text examines those viewpoints where the SLVIA predicts **significant** effects and those for which we consider the SLVIA to underestimate the significance of visual effects.

### Islay

Islay is located between 15km and 48km to the northwest of the WDA. Theoretical visibility of the Machair turbines on Islay extends across all the northern coastline and inland on north facing slopes and from much of the west facing coastline and west facing slopes inland. Theoretical visibility is also shown across parts of the settlements of Bridgend, Bowmore, Saligo, Kilchoman and Portnahaven.

Eight viewpoints were assessed on Islay in the SLVIA, and **significant** effects during the day and at night were predicted at six of these. Not significant effects are predicted for the other two viewpoints on Islay: Viewpoints 6: Bowmore and 8: The Oa. **Significant** visual effect is also predicted from Viewpoint 9: Colonsay-Port Askaig Ferry.

***Viewpoint 1: Ardnave Point, Islay (Figure 16.2.1 of Appendix 16.4)***

This viewpoint is representative of views experienced by recreational receptors visiting Ardnave Point, a low-lying peninsula on the northwest coast of Islay with a remote circular walk (Core Paths C054 and C511) which offers views across rough pasture and machair to Loch Gruinart nature reserve and the outlying Nave Island. The viewpoint is in the North & West Islay (Coast) LLA. The walk is known for its wildlife, views and the lack of development is an important feature of the landscape. The ZTV shows that views to turbines would be gained from most of the Ardnave circular walk.

Figure 16.2.1 shows the proposed turbines on the offshore horizon to the northwest beyond Nave Island 16km away against the skyline, appearing as a large-scale offshore array with some slightly denser clusters. Some of the turbine bases will be screened by the landform of Nave Island with their hubs and tips appearing above the island. Due to their proximity, the movement of the turbines and the contrast with the introduction of large-scale vertical infrastructure elements, the development would be extremely prominent from this remote site and dominate views to the northwest.

The SLVIA assesses the receptor sensitivity to be high, magnitude of impact high, and significance during operation as **major** and **significant**.

***Viewpoint 2: Saligo Bay, Islay (Figure 16.2.2 of Appendix 16.4)***

This viewpoint is representative of recreational receptors visiting the beach at Machir Bay. The viewpoint lies close to sea level and is within the North & West Islay (Coast) LLA. Similar views would also be obtained from most of the coastal edge of the Rinns of Islay, an area where the lack of development is an important feature of the landscape. The ZTV shows theoretical visibility of the development along virtually all the coastline in this area.

Figure 16.2.2 shows the proposed turbines spread across the offshore horizon to the northwest 18km away, seen against the skyline and perceived as one large-scale windfarm. A few of the turbines to the east of the WDA are screened by the rocky hills of Cnoc Uamh nam Fear which lie further to the north. This gives the illusion that the development lies adjacent to the shores of Islay. Despite the distance of the turbines, the size

and the movement of the turbines and the perception of its apparent proximity to the Islay landscape, would mean that the development would be extremely noticeable in good weather conditions.

The SLVIA finds receptor sensitivity to be high, magnitude of impact high, and significance during operation as **major** and **significant**.

***Viewpoint 3: Kilchoman, Islay (Figure 16.2.3 of Appendix 16.4)***

The view is representative of views experienced by visitors to the Kilchoman Distillery. This viewpoint is located inland to the south of Loch Gorm at the junction of the distillery entrance and the minor road between Loch Indaal and Kilchoman. Similar views would be available from scattered properties in the vicinity. The ZTV shows widespread theoretical visibility to the development's turbines across this inland area.

Figure 16.2.3 shows the proposed turbines to the northwest at 20km away, seen against the skyline, behind the moorland to the east of Loch Gorm. The central part of the wind farm would be visible with the outer turbines to the east and west obscured by the rocky coastal landform. The view gives the illusion of being an onshore wind farm as the sea is not visible from this viewpoint and the size of the turbines would suggest that they are relatively close. The size and the movement of the turbines would mean that the vertical structures would be a focal point within this mostly horizontal landscape.

The SLVIA finds receptor sensitivity to be medium, magnitude of impact high, and significance during operation as **major** and **significant**.

We disagree with the SLVIA where it finds receptor sensitivity as medium (for visitors). The ES states that the viewpoint is also representative for residents and thus should be given a high sensitivity, however this would not change the significance during operation.

***Viewpoint 4: Creag Bealach na Caillich, Islay (Figure 16.2.4 of Appendix 16.4)***

This viewpoint is representative of recreational receptors visiting the west coast of Islay, on a coastal route between Kilchiaran and Kilchoman (Core Path C056) which offers views across rough pasture and dunes to the beach at Machir Bay. The viewpoint is at an elevated location next to a wireless station and is within the North & West Islay (Coast) LLA. The walk is known for its unspoilt coastal views, and the lack of development is an important feature of the landscape. The ZTV shows that the turbines would be visible from the coastal section of the route.

Figure 16.2.4 shows the proposed turbines on the offshore horizon to the northwest 22km away against the skyline, beyond the peninsula of Coul Point, appearing as a large-scale offshore windfarm with a few slightly denser clusters. Despite the distance of the turbines, the size and the movement of the turbines and the contrast of the large-scale infrastructure with the undeveloped nature or the landscape, would mean that the development would be extremely noticeable and dominate views.

The ES finds receptor sensitivity to be high, magnitude of impact high, and significance during operation as **major** and **significant**.

***Viewpoint 5: Minor Rd near Portnahaven, Islay (Figure 16.2.5 of Appendix 16.4)***

This viewpoint is representative of users of the local road close to the settlement of Portnahaven. The view is elevated and is part of a core path route forming a loop between Portnahaven and Octofad (Core Paths C057, C512 and C058). The viewpoint is in the North & West Islay (Coast) LLA. The walk is known for its remote qualities, and the lack of development is an important feature of the landscape. The ZTV shows that turbines would be visible form sections of the route close to Portnahaven.

Figure 16.2.5 shows the proposed turbines on the offshore horizon to the northwest 27km away against the skyline, appearing as a large-scale offshore array with some slightly denser clusters. The turbines appear at this viewpoint to be located close to Lossit Point on Islay which lies further to the north. Despite the distance of the turbines, the size and the movement of the turbines and the perception of its apparent proximity to the Islay landscape, would mean that the development would be extremely noticeable in good weather conditions.

The SLVIA finds receptor sensitivity to be medium, the magnitude of impact high, and significance during operation as **major** and **significant**.

We disagree with the SLVIA where it finds receptor susceptibility as low for transport receptors and thus overall sensitivity as medium. The viewpoint is on a Core Path and in an LLA and receptors include walkers with a high susceptibility which would result in high sensitivity; however, this would not change the significance during operation. The settlement assessment also mentions this viewpoint as being provided to represent residents in Portnahaven, but residential receptors are not included in the Viewpoint 5 assessment table.

***Viewpoint 7: Beinn Bheigier, Islay (Figure 16.2.7 of Appendix 16.4)***

This viewpoint is representative of recreational receptors visiting the summit of Beinn Bheigier, the highest point on Islay (491m AOD). It is covered by South and East Islay LLA. Views from this location are long distance and panoramic across the island out to the open sea. To the northwest, the landform descends steeply across moorland and pasture lower down with Loch Indaal visible. No wind farm development is currently visible in any direction from the viewpoint.

Figure 16.2.7 shows the proposed wind farm seen on the horizon of the open sea to the northwest 39km away, seen beyond Islay as one large scale offshore windfarm framed from the viewpoint by the landform of the hill. Contrary to the ES text, the figure shows the lower parts of the turbines against the sea with hubs and blades seen against the sky, and the elevation of the viewpoint showing the depth of field of the large array. Despite the considerable distance to the development, due to their large scale the turbines would be individually visible, and their movement would increase attention. No large-scale development is currently seen from any direction, and the addition of the development compromises the remote undeveloped nature of this location.

The ES finds receptor sensitivity to be high, magnitude of impact medium, and significance during operation as **moderate** and **significant**.

***Viewpoint 9: Colonsay to Port Askaig Ferry (Figure 16.2.9 of Appendix 16.4)***

This viewpoint is representative of recreational receptors travelling on the ferry between Islay and Colonsay. The view is long distance and expansive across the open Atlantic. The landform of Oronsay is apparent to the north with Nave Island off the coast of Islay just visible to the south. The ZTV shows theoretical visibility across the route of the ferry once it has left the Sound of Islay and similar views will occur during most of the route, as it crosses open water.

Figure 16.2.9 shows the proposed turbines on the horizon of the open sea to the west 24km away, appearing as one windfarm that stretches approximately three quarters of the distance between Nave Island and the southern tip of Oronsay. The turbine hubs and blades would be seen against the sky, and their movement would be apparent.

The SLVIA finds receptor sensitivity to be medium, the magnitude of impact medium, and significance during operation as **moderate** and **significant**.

The SLVIA does not mention people on recreational vessels as visual receptors, but this viewpoint would also represent views for them. These receptors would be likely to have a high sensitivity to the development. In views to the development from this location, the wide spread of the wind farm turbines appears to 'block' the view to the open sea giving an impression of hemming in the passage between Oronsay and Islay and introducing large scale development to a previously undeveloped seascape. In our view due to these factors the development would result in a high magnitude of change resulting in a **major** and **significant** effect.

### Jura

Jura is between approximately 27km and 52km to the south-east of the WDA. Theoretical visibility of the Machair turbines on Jura is difficult to assess fully as detailed ZTVs are only provided for the areas around the viewpoints and do not cover the whole of the island. Visibility is likely to extend across much of the western coastline and inland on west facing slopes and summits.

Three viewpoints were assessed on Jura in the SLVIA, and **significant** effects during the day are predicted at two of these. The visual effect at Viewpoint 12: An Cruachan at the northern point on Jura, is assessed as not significant.

The SLVIA predicts **significant** visual effects for the following viewpoints:

***Viewpoint 10: Loch Tarbert, Jura (Figure 16.2.10 of Appendix 16.4)***

This viewpoint is representative of recreational receptors visiting the remote southern shore of Loch Tarbert. It is located within the Jura NSA and WLA 5 Jura, Scarba Lunga and Garvellachs. The view looks west over the open waters of Loch Tarbert and rocky islets to the open sea and is framed by the northern shoulder of Scrinadle and rocky headlands of the mouth of Loch Tarbert. Oronsay and Colonsay are visible in the distance. The ZTV shows theoretical visibility across the coastline and further inland on west facing slopes.

Figure 16.2.10 shows the proposed turbines on the horizon of the open sea to the southwest 34km away, appearing as one windfarm that stretches the whole way across the sea view. The turbine hubs and blades would be seen against the sky, and their movement would be apparent.

The SLVIA finds receptor sensitivity to be high, magnitude of impact medium, and significance during operation as **moderate** and **significant**.

In views to the proposal from this location, the wide spread of the wind farm turbines appear to 'block' the view to the open sea giving an impression of hemming in the entrance to Loch Tarbert and introduces large scale development to a remote and undeveloped seascape. In our view despite the considerable distance to the turbines, these factors would result in a high magnitude of change resulting in a **major** and **significant** effect.

***Viewpoint 11: Beinn an Oir, Jura (Figure 16.2.11 of Appendix 16.4)***

This elevated panoramic viewpoint is representative of recreational receptors visiting the summit of Beinn an Oir (AOD 785m), a Corbett and the highest summit of the Paps of Jura, a series of three summits which are a landmark on the west coast of Scotland. The viewpoint is located within the Jura NSA and WLA 5 Jura, Scarba Lunga and Garvellachs. Views from this location are long distance and panoramic out to the open sea across the hills of Jura with Islay, Colonsay and Oronsay visible to the west and northwest beyond. The ZTV shows visibility across the summit and on west facing slopes of Jura. Operational windfarms on Kintyre are visible from this panoramic viewpoint in views to the south over 60km away.

Figure 16.2.11 shows the proposed wind farm seen on the horizon of the open sea to the west 39km away, viewed beyond Islay and Oronsay as one large scale offshore windfarm. Contrary to the SLVIA text, the figure shows the hubs of the turbines would be seen against the sea with blades seen against the sky, with the

elevation of the viewpoint revealing the depth of field of the large array. Despite the considerable distance to the development, due to their large scale the turbines would be individually visible, and their movement would attract attention. The spread of the development would be apparent from this viewpoint with the area occupied by turbines taking up a wider angle of view than the island of Colonsay. This contrast would highlight the discrepancy in scale between the remote smaller islands and the expanse of the WDA. Although wind development on Kintyre is currently visible from the Paps of Jura their smaller height does not compromise the remote undeveloped nature of this location in the same way as Machair would.

The SLVIA finds receptor sensitivity to be high, magnitude of impact medium, and significance during operation as **moderate** and **significant**.

We consider that despite the considerable distance to the turbines, their extensive spread and the introduction of large-scale development to a remote and previously undeveloped seascape, would result in a high magnitude of change resulting in a **major** and **significant** effect.

### Colonsay and Oronsay

Colonsay and Oronsay are located between approximately 12km and 21km to the east of the WDA. **Significant** visual effects during the day and at night are predicted in the SLVIA on both islands, from west-facing coastlines, but also inland from west facing slopes and hill summits, as well as areas of north and south-facing coastline along the Strand.

On Colonsay receptors that will experience significant effects include residential receptors at Lower and Upper Kilchattan and Uragaig close to Kiloran Bay, recreational receptors on the west coast including high points inland and beaches, core paths and road users of the B-road network.

S**ignificant** effects are predicted for visitors to Oronsay Priory and walkers on the main route to and across Oronsay; Core Path C045.

**Significant** effects on visual amenity are predicted at all four viewpoints on Colonsay and Oronsay assessed in the SLVIA, both during the day and at night:

***Viewpoint 13: Oronsay Priory, Oronsay (Figure 16.2.13 of Appendix 16.4)***

This viewpoint is representative of recreational receptors visiting the Oronsay Priory, a scheduled ancient monument, and is the only viewpoint included in the SLVIA from Oronsay. Oronsay is a relatively flat low island with open views across rough pasture and machair. The island is accessed via Core Path C045 which crosses 'The Strand', a stretch of sandy tidal flats accessible at low tide linking Oronsay to Colonsay. Oronsay is celebrated for its remote qualities, and its undeveloped nature is an important feature of the landscape character. The ZTV shows that turbines would be visible from much of Oronsay and The Strand, with the Priory and Oronsay Farm the only built vertical elements on the island that would provide only very localised screening.

Figure 16.2.13 shows the proposed turbines on the offshore horizon to the west 14km away against the skyline, appearing as a large-scale offshore windfarm with some slightly denser clusters. Due to their proximity, the turbines would be extremely prominent from this remote and singular site and dominate views to the west across much of the island. The turbines' very large scale is emphasised by the contrast with the modest scale of Oronsay Farm buildings and the Priory.

The ES finds receptor sensitivity to be high, magnitude of impact high, and significance during operation as **major** and **significant**. The setting of the Priory is also assessed in the Cultural Heritage chapter of the EIAR where the effect it is assessed to be of low adverse magnitude.

***Viewpoint 14: B8086 south of Lower Kilchattan, Colonsay (Figure 16.2.14 of Appendix 16.4)***

This viewpoint is representative of road users on the B8086 and is located to the south of Lower Kilchattan. The SLVIA states it is also representative of residents in properties to the north of the viewpoint in Upper and Lower Kilchattan. The long-distance view looks across a rocky coastal edge out across the open sea. The ZTV shows that most of the properties of upper and Lower Kilchattan have theoretical visibility to the turbines as does approximately 4km of the B8086.

Figure 16.2.14 shows the proposed turbines seen on the offshore horizon to the west 14km away against the skyline, appearing as one large scale offshore windfarm across the horizon, occupying most of the open sea visible from this location. The turbines would dominate views from this location adding contrasting large scale vertical infrastructure elements to a current undeveloped landscape, with the blades' movement making them more conspicuous within views.

The ES finds receptor sensitivity to be medium, magnitude of impact high, and significance during operation as **major** and **significant**.

We do not agree with the assessment of sensitivity for this viewpoint which, as representative of views experienced by residents, should be high. The ZTV shows widespread theoretical visibility for residents. We consider that more importance should be placed on views from residential properties, and a suitable viewpoint from within Kilchattan should have been assessed.

*Viewpoint 15: Uragaig, Colonsay (Figure 16.2.15 of Appendix 16.4)*

The viewpoint is located on a minor road to the west of the settlement of Uragaig. The SLVIA states that it is representative for residents and recreational receptors in the area. The elevated view looks west over rough grassland to the sea with the view framed either side by rising coastal landform. No wind farm development is currently visible from the viewpoint. The ZTV shows that several properties at Uragaig would have theoretical visibility to the turbines as would the northern part of the beach at Kiloran Bay.

Figure 16.2.15 shows the proposed wind farm on the horizon of the open sea to the west at 17km away, seen against the skyline. The central part of the wind farm would be visible with the outer turbines to the south and north obscured by the coastal landform. The view of the turbines stretching across all the visible seascape gives a feeling of enclosure. The framing effect and the movement of the turbines would mean that the turbines would be a focal point within this coastal landscape.

The SLVIA finds receptor sensitivity to be high, magnitude of impact medium and significance during operation as **moderate** and **significant**.

We disagree with the SLVIA assessment of medium magnitude and consider the magnitude of impact to be high, due to the landform funnelling views towards the turbines causing them to be a focal point and their relative proximity, which would result in a **major** and **significant** effect. Additionally, a viewpoint located at a higher elevation closer to the properties at Uragaig might be preferable to be fully representative for residents.

***Viewpoint 16: Summit of Beinn nan Gudairean, Colonsay (Figure 16.2.16 of Appendix 16.4)***

This viewpoint is representative of recreational receptors visiting the summit of Beinn nan Gudairean, the highest point on Colonsay (136m AOD). Views from this location are long distance and panoramic across the island out to the open sea. No wind farm development is currently visible in any direction from this viewpoint. To the west, a ridge of the hill partially screens the offshore horizon, with views beyond Beinn nan Gudairean across Loch Fada which is surrounded by pasture and buildings of Upper and Lower Kilchattan. The ZTV

shows that virtually all the hill summits and west facing slopes on Colonsay would have theoretical visibility to the turbines.

Figure 16.2.16 shows the proposed wind farm in the west on the horizon of the open sea at 17km beyond Colonsay, seen as one large scale offshore windfarm. The crest of a ridge partially screens some of the turbine bases, but all the turbines are visible with hubs and blades seen against the sky. Even at 17km away the contrast in scale between the housing of Upper and Lower Kilchattan and the considerable height of the turbines is notable, with the elevation of the viewpoint showing the depth of field of the large array. The turbines would be individually visible, and their movement would be noticeable. No large-scale development is currently visible in any direction, and the addition of the proposal would compromise the sense of remoteness experienced on Beinn nan Gudairean.

The SLVIA finds receptor sensitivity to be medium, magnitude of impact high and significance during operation as **moderate** and **significant**.

We consider the addition of the development compromises the remote unspoilt nature of the Beinn nan Gudairean viewpoint and would evaluate walkers to the summit to experience the panoramic viewpoint as being of high sensitivity. These factors would result in a **major** and **significant** effect.

### Scarba and Luing

Scarba and Luing are between approximately 45km and 55km to the northeast of the WDA. Theoretical visibility of the Machair turbines is difficult to assess fully as detailed ZTVs are only provided for the areas around the viewpoints and individual islands and do not cover the whole area. Visibility extends across much of the western coastline and predominantly on the higher points inland.

Three viewpoints were assessed within the Scarba and Luing area in the SLVIA and were all assessed as not significant. The assessment of effects on visual amenity for which we consider may be **significant** are discussed below:

***Viewpoint 18 Scarba (Figure 16.2.18 of Appendix 16.4)***

This viewpoint is representative of recreational receptors exercising their right to roam, visiting the highest point on Scarba (449m AOD) and is located within the Scarba, Lunga and Garvellachs NSA and the Jura, Scarba, Lunga and Garvellachs WLA. Views west are represented in Figure 16.2.18. Wirelines illustrate the long distance and open views across the Atlantic towards Colonsay and Oronsay. At present, there is a lodge and minor roads in the east of the island with the centre and west very remote in nature. The ZTV shows there would be high visibility of the scheme from the western and central part of Scarba. No wind farm development is currently visible in any direction.

Wirelines in Figure 16.2.18 show the proposed wind farm to the southwest beyond the low-lying landmass of Colonsay and Oronsay with the open Atlantic beyond and to either side. The wind farm would be approximately 47km from the viewpoint at its closest point. There would be partial screening of central wind turbines from Colonsay and Oronsay but due to the scale of the development the majority would be visible to the north and south of the island and with the hubs and blade apparent on the horizon.

The SLVIA finds the receptor sensitivity to be high, magnitude of impact low and the significance minor and not significant.

We consider that during good visibility the development compromises the remote and wild nature of the views from the NSA, alongside the open views across the Firth of Lorn southwest towards Colonsay and Oronsay and the Atlantic beyond. The scale of change within the geographical context of these views is

arguably medium, resulting in medium magnitude of impact, with the proposal prominent on the horizon, potentially resulting in a **moderate** and **significant** effect.

***Viewpoint 19 Cnoc Dhomnuill, Luing (Figure 16.2.19) of Appendix 16.4***

This viewpoint is representative of recreational receptors visiting the viewpoint of Cnoc Dhomnuill (94 AOD) in the north of the island of Luing. It is located within the Knapdale/Melfort LLA which has been scoped out of the assessment. Views west towards the proposal are represented in Figure 16.2.19 which illustrate the long-distance views across the Sound of Luing and the archipelago of small islands within the Scarba, Lunga and Garvellachs NSA in the foreground, with the open Atlantic beyond. The ZTV shows there would be high visibility of the wind turbine on the higher ground with visibility decreasing lower down on the western coastline. No wind farms are currently visible in any direction.

Figure 16.2.19 shows the proposed wind farm to the southwest on the horizon beyond the small islands in the foreground at 54km from the viewpoint. The wind farm is partially screened beyond the larger island of Garbh Eileach, with the blade and hubs mostly visible on the skyline compromising the long-distance and undeveloped views to the southwest.

The SLVIA finds the receptor sensitivity to be high, magnitude of impact low and the significance minor and not significant.

We consider that during good visibility the proposal would compromise the remote nature of the views across the Garvellachs towards the open Atlantic, and arguably the scale of change in views (across the NSA) would be medium, resulting in a medium magnitude of impact and a **moderate** and **significant** effect.

### Mull, Iona, Erraid, Ulva and Staffa

Mull, Iona, Erraid, Ulva and Staffa are located between approximately 20-60 km to the north-east of the WDA. Theoretical visibility of the Machair turbines on Mull extends across the southern coastline and the south facing slopes of the western part of Mull and inland on some of the southwest facing slopes and summits of the hills and mountains, including Ben More.

Four viewpoints on the Mull mainland (23: Carsaig Bay, 26: B873, 27 Ben More and 28: Cruachan Treshnish Cairn), which are all located within the Loch na Keal NSA, are assessed in the SLVIA, and effects are not assessed to be significant. **Significant** effects are predicted at Viewpoint 20: Erraid, at the southwestern tip of Mull and the Sound of Iona Viewpoint 21: Mull – Iona Ferry.

On Iona, theoretical visibility is widespread and includes most of the southern and inhabited eastern coastline, parts of the western coastline and southwestern facing hill slopes and summits. Theoretical visibility of the turbines is indicated from the main settlement of Baile Mor and village of Sligneach on Iona. Visual effects at viewpoint 22: Dun I, Iona, the highest point of Iona in the northern part of the island are assessed as **significant**.

Viewpoints on the islands of Staffa and Ulva to the west of Mull are also included in the SLVIA; Viewpoint 24: Staffa and Viewpoint 25: Ulva, with effects assessed as not significant.

*Viewpoint 20: Erraid, Mull (Figure 16.2.20 of Appendix 16.4)*

This viewpoint is representative of recreational receptors visiting the high point on Erraid. It is located within the Central, South and West Mull LLA. Erraid comprises a low circular rocky island with open views in all directions. The island is accessed at low tide by foot and has a small community living on it. Erraid is known for its remote character. The ZTV shows patchy theoretical visibility across higher parts of the island.

Figure 16.2.20 shows the proposed turbines on the horizon of the open sea to the southwest 21km away, appearing against the sky as one large scale offshore windfarm with one outlier turbine outlier (no 38) to the west. The SLVIA states that views of this nature would be available from much of the coastal edge to the south-west of Erraid and the Ross of Mull, and from inland areas with south-western facing slopes and thus implies this viewpoint is representative of these areas too.

The SLVIA finds receptor sensitivity to be high, magnitude of impact medium and significance of effect during operation as **moderate** and **significant**.

We consider that the introduction of a large-scale development into this remote undeveloped natural seascape would result in a high magnitude of change resulting in a **major** and **significant** effect.

*Viewpoint 21: Mull – Iona Ferry (Figure 16.2.21 of Appendix 16.4)*

This viewpoint is representative of recreational receptors travelling on the ferry across the Sound of Iona. Although the viewpoint represents travellers on the ferry, it is also the closest comparable visualisation presented in the ES to represent residents on the east coast of Iona at Baille Mor and Sligneach. The view is across the Sound of Iona with Iona seen to the west and Mull and associated smaller islands to the east and the open sea framed between these two land masses to the south. The ZTV shows theoretical visibility across the route of the ferry.

Figure 16.2.21 shows the proposed turbines on the horizon of the open sea to the southwest at 24km away, appearing as one windfarm that stretches the whole way across the view to the open sea, from the islands off Mull to Iona. The turbine hubs and blades would be seen against the sky, and their movement would be apparent.

The ES finds receptor sensitivity to be medium, magnitude of impact medium and significance during operation as **moderate** and **significant**.

The ES does not mention people on recreational vessels and wildlife tour boats as receptors, but this viewpoint would also represent views for them. These receptors would be likely to have a high sensitivity. In views to the development from this location, the wide spread of the wind farm turbines appears to 'block' the view to the open sea giving an impression of hemming in the Sound of Iona and introducing large scale development to a previously undeveloped seascape. In our view due to these factors the development would result in a high magnitude of change resulting in a **major** and **significant** effect. It also is likely that residents (high sensitivity) with southwest aspects at Baille Mor and Sligneach would experience similar views of the development to Viewpoint 21.

*Viewpoint 22: Dun I, Iona (Figure 16.2.22 of Appendix 16.4)*

This viewpoint is representative of recreational receptors walking up to the highest point on Iona. It is located within the Central, South and West Mull LLA. Dun I is a notable landmark with a cairn at the summit and panoramic elevated views across the entire island of Iona in all directions. To the south views show the island surrounded by the sea and ocean, with the only development being the housing of Baille Mor and other scattered properties on the island.

Figure 16.2.22 shows the proposed wind farm seen on the horizon of the open sea to the southwest 25km away, seen beyond the south part of Iona as one large scale offshore windfarm. The turbine hubs and blades would be seen against the sky, and their movement would be apparent.

The SLVIA finds receptor sensitivity to be high, magnitude of impact medium and significance during operation as **moderate** and **significant**.

We consider that views to the development from this location compromise the remote unspoilt nature of views from this location. No large-scale development is currently obtained from any direction from this viewpoint, and the undeveloped character would be compromised. In our view the development would result in a high magnitude of change resulting in a **major** and s**ignificant** effect.

*Viewpoint 24: Staffa (Figure 16.2.24 of Appendix 16.4)*

This viewpoint is representative of recreational receptors visiting Staffa, a small uninhabited island with extraordinary rock formations to the west of Mull which is owned by the National Trust for Scotland. Trips to the island are run for visitors and include visits to Fingal's Cave and walking around the island. The viewpoint appears to be located at the entrance to Fingal's Cave (where the viewer's attention is likely focussed on the cave itself) rather than one of the more elevated points on the island, from which the wider sea views would be the focus of the viewer and wirelines only are provided.

Figure 16.2.24 shows the proposed wind farm on the horizon to the southwest at 36km away. The windfarm is seen in two parts, with landform of Iona partially screening the hubs of some of the central turbines. The Ross of Mull is seen adjacent to the east of the windfarm, with all the turbine hubs and blades viewed against the sky spaced in varying clusters. The SLVIA finds receptor sensitivity to be high, magnitude of impact low and significance during operation as minor and not significant.

We consider that views to the development from this location compromise the remote unspoilt nature of views from Staffa. No large-scale development is currently seen from any direction from the island, and this undeveloped character would be compromised. Despite the distance to the development, we consider that the very large scale of the turbines beyond Iona and the Ross of Mull would result in a medium magnitude of change from this viewpoint resulting in a **moderate** and **significant** effect.

*Viewpoint 27: Ben More, Mull (Figure 16.2.27 of Appendix 16.4)*

This viewpoint is representative of recreational receptors visiting the summit of the popular munro, Ben More (966 m AOD). It is covered by three landscape designations; the Loch na Keal, Isle of Mull NSA, the Mull WLA and Central, South and West Mull LLA. Views from this location are panoramic and spectacular. The immediate foreground consists of rocky upland terrain. To the south-west, the landform descends steeply across Loch Scridian and the Ross of Mull. Longer distance views extend across the sea towards Colonsay and Jura with the Paps of Jura notable landmarks on the skyline to the south. No wind farm development is currently visible from the viewpoint.

Figure 16.2.27 shows the proposed wind farm on the horizon of the open sea to the southwest 45km away, seen beyond the south part of Iona as one large scale offshore windfarm. Contrary to the SLVIA text, the figure shows turbine hubs and blades would be seen partially against the sea and partially against the sky, with the elevation of the viewpoint exposing the depth of field of the large array. The SLVIA finds receptor sensitivity to be high, magnitude of impact low and significance during operation as minor and not significant.

We consider that views to the development from this location compromise the remote unspoilt nature of this panoramic view. No large-scale development is currently seen from any direction from Ben More and the undeveloped seascape character would be compromised. Despite the considerable distance to the proposal, due to their large scale, the turbines would be individually visible, and because of the high elevation of the viewpoint, the considerable spread of the wind farm would be clearly apparent. We consider that this would result in a medium magnitude of change from this viewpoint resulting in a **moderate** and **significant** effect.

**Tiree**

*Viewpoint 29: Hynish, Tiree (Figure 16.2.29 of Appendix 16.4)*

This viewpoint is representative of residential receptors with open coastal views southwards living in the small community of Hynish in the southwest on the island of Tiree. Views look over the rocky coastline and out across the open Atlantic, giving way to expansive, uninterrupted sea views. No wind farm development is currently visible from the viewpoint. Figure 16.2.29 shows the proposed wind farm seen on the horizon of the open sea to the south 37km away at its closest point. The wind farm, in particular the blades and hubs, would be apparent against the skyline across a wide arc of view due to the uninterrupted nature of the foreground.

The ES finds receptor sensitivity to be high, magnitude of impact low and significance of effect during operation as minor not significant.

We consider that views to the proposal from this location compromise the remote unspoilt and uninterrupted nature of this expansive seascape towards the Atlantic. No large scale of development is currently visible in this direction for residents, and the remote and wild character would be affected. The distance notwithstanding, the large scale of the turbines and wide development area, would make the wind farm clearly apparent on the horizon. We consider this would result in a medium magnitude of impact resulting in a moderate **significant** effect.

## Settlement Assessment

Overall, throughout the ES the residents of the affected islands who are shown to have theoretical visibility of the development have been underrepresented and sometimes ignored in the reporting. Residents on Iona at the main settlement of Baile Mor are predicted to experience **moderate** and **significant** effects, however visual effects on residents of scattered properties elsewhere on Iona are not assessed.

Residents of settlements on Islay and Colonsay showing theoretical visibility such as Portnahaven, Upper Kilchattan, Lower Kilchattan and Uragaig are assigned viewpoints which are nearby but not next to the settlements, and thus not fully representative and these residential receptors not properly assessed as would be expected under GLVIA guidance. GLVIA3 is clear that people living in the area of the proposed development should be considered as receptors (paragraph 6.13).

The SLVIA states in section 16.7.1.3.4 they have considered settlements as *'Settlements are those defined as such within the Argyll and Bute Council Local Development Plan 2 (Argyll and Bute Council 2024). Settlements across the Study Area tend to be small scale and located along the coasts of the islands. Beyond defined settlements there are many clachan-type clusters of dwellings located throughout the inhabited islands; these are represented by the viewpoints set out in Table 16.10."*

The representation of residential receptors by viewpoints approach has not been fully undertaken and we would argue that only assessing settlements defined in the A&B LDP is an approach that disregards many of the occupants of these islands who are settled in much smaller villages and other scattered communities. For example, only one settlement on Colonsay is defined within the LDP: Scalasaig, which does not have theoretical visibility to the scheme. Upper and Lower Kilchattan and Uragaig are shown by the ZTV to experience theoretical visibility yet have not been included in the assessment.

The SLVIA (Table 16.54) appears to disregard any of the residential properties on Colonsay within which the ZTV shows visibility to the turbines. Tables 16.55-16.57 for other islands are titled *"Operational effects on settlements and routes"* whereas residents of Colonsay are represented by Table 16.54 titled *"Operational effects on routes on Colonsay and Oronsay"*.

The more detailed ZTV supplied for Iona on Figures 16.2.21 and 16 2 22 show theoretical visibility across many of the properties on the eastern side of Iona. The assessment of effects on these residents' visual

amenity is covered in a sentence by the ES Table 16.56 which states *"Baile Mor – medium magnitude of impact, resulting in a moderate and significant effect;".* No detailed commentary of this assessment is given and no viewpoint provided from any areas of Iona's east coast settlement. The closest viewpoint supplied within the ES is the Viewpoint 21 - Mull - Iona Ferry. For residents at Baille Mor and Sligneach it is likely that properties with southwest aspects would experience similar views to Viewpoint 21 with the turbines filling the framed view of the open sea between Mull and Iona. This under-reporting of significant effects experienced by island community is a failing of the SLVIA.

In addition, two of the viewpoints which the SLVIA says represent residents have not been assigned high sensitivity, which we would expect, but rather medium sensitivity (Viewpoint 3: Kilchoman, Islay, Viewpoint 14: B8086 south of Lower Kilchattan, Colonsay). The SLVIA contradicts this approach at Viewpoint 15 and 29 where residential receptors are evaluated to be high sensitivity; *"Residential receptors at this location are considered to be of high susceptibility. The viewpoint is not located in a designated landscape though it offers scenic coastal views. Value is judged to be medium. On balance, taking account of the judgements of susceptibility and value, the overall sensitivity is judged to be high."*

## Transport Routes

### Roads

The SLVIA predicts **significant** visual effects to be experienced on:

- the B8085, B8086, and B8087 on Colonsay; and
- the A846, B8016, B8017 and B8018 on Islay.

### Recreational Routes

The SLVIA predicts **significant** visual effects to be experienced on the following Core Paths:

- C045, C046, C047 and C048 on Colonsay;
- C045 on Oronsay;
- C054, C055, C056, C057, C058, C056, C061, C511 and C512 on Islay, with those affected particularly in the northwest;
- C040 and CO41 on Mull; and
- C483 and C484 on Iona.

### Ferry Routes

The SLVIA predicts **significant** visual effects to be experienced on two ferry routes:

- Colonsay to Port Askaig (Islay) Ferry (Viewpoint 9: Colonsay – Port Askaig Ferry). The sequential assessment of the route finds the overall magnitude of impact low with receptors of medium sensitivity resulting in a **moderate** and **significant** effect; and
- Mull to Iona Ferry –this is included in the viewpoint assessment (see above) and found to have **significant** effects.

The sequential visual assessment for the Oban to Colonsay Ferry (Viewpoint 17: Oban – Colonsay Ferry) finds the overall magnitude of impact to be low with receptors of medium sensitivity resulting in a minor and not significant effect. The viewpoint is representative of recreational and transport receptors travelling on the Oban-Colonsay Ferry approximately 6km west of the Garvellachs. Views from this location are long distance and panoramic across the wide expanse of the open sea framed between the northern extent of Colonsay to the southwest and the Ross of Mull to the northwest. No wind farm development is currently visible in any direction from this viewpoint. The ZTV shows the theoretical visibility across some of the ferry route.

Figure 16.2.17 shows the proposed wind farm seen to the northwest on the horizon of open sea 38km away. The wind turbines bases are mostly screened by the sea horizon, but the hubs and blades are apparent against the skyline. A small number of turbines are visible behind the very northern tip of Colonsay. No large-scale development or human settlement is visible in these views, and the introduction of a substantial wind farm would compromise the undeveloped open sea view.

The ES finds the receptor sensitivity to medium, magnitude of impact low and significance during operation as minor and not significant.

We consider the addition of the development compromises the remote and unspoilt nature of the views towards the southwest of the open Atlantic and on the approach to Colonsay and would classify any recreational receptors (tourists) who were visiting the island with high sensitivity. We consider that the magnitude of change in views to the southwest would arguably be medium. These factors would likely result in a **moderate** and **significant** effect.

**Key Recreational and Tourist / Visitor Attractions**

Iona is historically an important place of Christianity and known as a quiet spiritual destination for pilgrims. St Marys Priory is central to this, but no viewpoint has been provided from this important location on the island. However, a combination of Google Streetview and the ZTV indicate that there would be visibility of the turbines adjacent to the Priory, which we consider should have been addressed in the SLVIA.

Little consideration has been given to the renowned beaches of the Hebridean islands which are an important draw to visitors to Islay, Colonsay and Iona. Theoretical visibility is indicated on many beaches including the famous Kiloran Bay in Colonsay, Port Ban and the Bay at the back of the Ocean in Iona and numerous sandy beaches on the west coast of Islay.

No mention has been given in the SLVIA to users of inshore waters for example engaged in wildlife tours, kayaking, paddle boarding, yachting and other water-based activities all of which could be expected to have high sensitivity.

## ▪ Cumulative effects

Due to the lack of other wind farm developments, no significant additional cumulative effects on seascape, landscape or visual receptors are predicted in the ES, and we agree with this assessment.

# Conclusions

## Landscape

Overall, the Landscape Character Assessment appears to be comprehensive and generally supported by the accompanying ZTV analysis, figures and visualisations. We agree with some of the conclusions presented. However, the SLVIA appears to underestimate effects on the LCTs:

- LCT 42 (Rocky Moorland – Argyll), specifically the area south of Loch Gorm and;
- LCT 35 (Rugged Mountains), specifically the Jura units.

We consider the extent of visibility and influence of the proposal on perceptual qualities such as wildness, remoteness and the relationship with the sea to result in a higher magnitude of impact and significance of effect than those presented in the assessment.

Overall, the Coastal Character Assessment appears to be comprehensive and generally supported by the accompanying ZTV analysis, figures and visualisations. Whilst we agree with some of the conclusions, the SLVIA appears to underestimate the significance of effects on the following CCAs:

- CCA 7 - Ross of Mull;
- CCA 15 - Loch Tarbert;
- CCA 18 – Sgairail and;
- CCA 20 – Ardnave Point to Rhinns Point.

The proposal would influence key characteristics of these CCAs associated with remoteness, wildness, openness and the relationship between the coastline and the sea and we consider that the extent of visibility, scale of the proposal and influence on defining characteristics would result in a higher magnitude of impact and significance of effect.

Overall, the assessment of effects on the NSAs appears comprehensive and generally supported by evidence. However, we consider that the magnitude of impact and significance of effects on several SLQs relating to remoteness, wildness, naturalness and the relationship between the landscape and sea has been underestimated in the SLVIA. We do not agree with the conclusion that the effects on 'the remaining NSA SLQs' presented in Appendix 16.2 would be 'no greater than minor and not significant'.

- For the Jura NSA (a medium magnitude of impact and **moderate** significance for the SLQ *An island close yet remote* and a high magnitude of impact and **major** significance for the SLQ *The distinctive Paps of Jura* would be appropriate.
- For Loch na Keal, Isle of Mull NSA, a medium magnitude of impact and a **moderate** significance would be more appropriate for the SLQs *A voyage from enclosed sea loch to the open Atlantic, Views of an island studded seascape, World famous Staffa and Fingal's Cave* and *A vast natural world, dwarfing human settlement*.
- For Scarba, Lunga and the Garvellachs NSA, a medium magnitude of impact and **moderate** significance would be appropriate for the SLQ *Uninhabited, Remote, Wild Islands*.

We generally agree with the assessment of effects on all the LLAs. **Significant** effects of up to **major** significance are predicted for North and West Islay (Coast) and Central, South and West Mull LLAs, and we consider these conclusions appropriate given the extent of visibility identified within the ZTV analysis and the influence of the proposal on the perceptual qualities of these landscapes. Effects on the Jura LLA are assessed as minor and not significant, which also appears reasonable given the distance of the proposal, the partial screening of Colonsay and limited extent of visibility identified within the assessment.

## Visual

The SLVIA assesses 30 viewpoints spread across an area up to 60km from the WDA, with either **moderate** or **major significant** effects predicted at 16 of these. Significant visual effects are predicted across a wide area encompassing many of the islands of the Hebrides to the north, south and east of the WDA, at distances of up 39km from the development.

We consider that effects assessed at several of the viewpoints which were assessed in the SLVIA as not significant, should be considered as **significant**. These are Viewpoint 17: Oban - Colonsay Ferry, Viewpoint 24: Staffa, Viewpoint 27: Ben More, Mull, and Viewpoint 19: Hynish, Tyree. Although these locations lie a considerable distance from the WDA, the very large scale and spread of the proposal mean it would still significantly affect the visual amenity. In addition, we consider that visual effects experienced from Viewpoint 18: Scarab and 19: Cnoc Dhomhuill could, arguably, also be **significant** in clear weather conditions.

The review also considers that for four seven viewpoints the significance of effect should be increased from **moderate** and **significant** to **major** and **significant** due to under-evaluation of either sensitivity or magnitude of effect. These include Viewpoint 9: Colonsay to Port Askaig Ferry, Viewpoint 10: Loch Tarbert, Jura, Viewpoint 11: Beinn an Oir, Jura, Viewpoint 15: Uragaig, Colonsay Viewpoint 16: Summit of Beinn nan Gudairean, Colonsay, Viewpoint 21: Mull – Iona Ferry and Viewpoint 22: Dun I, Iona.

We also consider that visual effects on residents of Iona, Colonsay and Islay have not been adequately assessed within the SLVIA. The assessment of visual effects experienced from settlements has been limited to include only settlements found within the A&B LDP despite much of the islands' population being in scattered communities. In addition, some viewpoints have been assessed without taking the high sensitivity of residents into account and viewpoints that are stated to represent residential receptors have not been located close to residential properties at Baile Mor and Sligneach on Iona, Kilchattan and Uragaig on Colonsay and Portnahaven on Islay.

The proposal's size and spread mean that it would significantly affect the visual amenity of over a very extensive area of some of the most valued and scenic seascapes in Scotland. The islands of Colonsay, Oronsay, Islay, Jura, Mull, Iona and Staffa are known for their unspoilt and beautiful scenery and many tourists come to experience their remote undeveloped character.

## Review against relevant policies:

NPF Policy 4c and National Marine Plan Policy GEN 7state that proposals that will affect a National Park, National Scenic Area, Site of Special Scientific Interest or a National Nature Reserve will only be supported where:

i. The objectives of designation and the overall integrity of the areas will not be compromised; or

ii. Any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.

Based on our review, the proposal would result in **significant** adverse effects on several SLQs within the NSAs, which may affect the objectives or integrity of the designation, such that social, environmental or economic benefits of national importance would need to outweigh the effects for the proposal to be supported.

The SLVIA identifies **significant** effects for the North and West Islay (Coast) and Central, South and West Mull LLAs. NPF Policy 4d require significant effects on the integrity of LLAs or the qualities for which they have been designated to be clearly outweighed by social, environmental or economic benefits of at least local importance.

The **significant** effects identified on the NSA SLQs and North and West Islay (Coast) and Central, South and West Mull LLAs also result in a conflict with Argyll and Bute LDP2 Policies 70 and 71, which seek to protect the integrity, character and special qualities of these designated landscapes.

NPF 4 Policy 11e requires project design and mitigation to demonstrate how impacts on communities and significant landscape and visual impacts are addressed. In terms of significant landscape and visual impacts, 11e ii states that such impacts are to be expected for some forms of renewable energy and where impacts are localised and/or appropriate design mitigation has been applied, they will generally be considered acceptable. NPF4 provides no guidance on the definition of what constitutes localised effects.

Table 16.154 in Section 16.8 of the SLVIA outlines embedded mitigation measures included in the wind farm proposal. These include:

- Development of and adherence to a Lighting and Marking Plan setting out set out the marine and aviation navigational lighting and marking measures to be applied during the construction and operation of the WDA to be secured under Section 36 and marine licence consent conditions;
- A buffer of at least 12km between the WDA and the nearest points of Islay and Colonsay, which the SLVIA States 'will reduce the magnitude of impact on seascape, landscape and visual impact receptors' and notes that further refinement of the WDA boundary is likely once additional data is collected following the completion of further WDA surveys and studies, and as part of the outcomes of the EIA process, including feedback from stakeholders.
- Refinement of the WDA following review of the Scoping Opinion and public and stakeholder consultation to reduce potential impacts on various receptor groups., resulting in a reduction in the WDA area by approximately 40% when compared with the W1 Plan Option Agreement Area and consequent reduction in the horizontal spread of turbines.

In addition to the refinement of the WDA boundary, the Applicant prepared a design strategy in collaboration with NatureScot. This strategy establishes a series of landscape and visual design objectives intended to minimise likely significant effects on the SLQs of the Jura, Loch na Keal (Isle of Mull) and Scarba, Lunga and Garvellachs NSAs. There are four themes that comprise the objectives, which include Project Scale, Project Extent and Orientation, Turbine Layout and Location Specific Measures. Collectively these aim to reduce the apparent scale and visual influence of the proposal, whilst recognising some seascape, landscape and visual change is inevitable. The design strategy (outlined in EIAR Appendix 15) acknowledges that design development is an ongoing process and that the design objectives will continue to inform refinement of the final turbine layout during post-consent stage, in consultation with NatureScot as required.

Although the above design/ mitigation measures may be considered appropriate and may have reduced landscape and visual effects to some extent, **significant** effects remain for large numbers of receptors. **Significant** visual impacts of the proposals would be experienced by Island communities of Iona, Islay and Colonsay which we consider to be a more than localised area. The proposal would introduce visually prominent wind farm development to a widely visible area of the landscape/ seascape that has none, significantly altering the way the landscape and seascape would be perceived.

The proposal could also be argued to be contrary to Schedule 9, paragraph 3 of the Electricity Act 1989 to have regard to the desirability of preserving natural beauty and to NPF4 Policy 4(a) which withholds support from development whose type, location or scale makes its impact on the natural environment unacceptable.

## Key viewpoints to be considered by the Planning Committee

- **Viewpoint 1: Ardnave Point, Islay**
- **Viewpoint 2: Saligo Bay, Islay**
- **Viewpoint 3: Kilchoman, Islay**
- **Viewpoint 4: Creag Bealach na Caillich, Islay**
  **Viewpoint 5: Minor Rd near Portnahaven, Islay**
- **Viewpoint 7: Beinn Bheigier, Islay**
- **Viewpoint 9: Colonsay to Port Askaig Ferry**
- **Viewpoint 10: Loch Tarbert, Jura**
- **Viewpoint 11: Beinn an Oir, Jura**
- **Viewpoint 13: Oronsay Priory, Oronsay**
- **Viewpoint 14: B8086 south of Lower Kilchattan, Colonsay**
- **Viewpoint 15: Uragaig, Colonsay**
- **Viewpoint 16: Summit of Beinn nan Gudairean, Colonsay**
- **Viewpoint 17: Oban-Colonsay Ferry**
- **Viewpoint 18: Scarba**
- **Viewpoint 19 Cnoc Dhomnuill, Luing**
- **Viewpoint 20: Erraid, Mull**
- **Viewpoint 21: Mull – Iona Ferry**
- **Viewpoint 22: Dun I, Iona**
- **Viewpoint 24: Staffa**
- **Viewpoint 27: Ben More, Mull**
- **Viewpoint 29: Hynish, Tiree**

# DAERA

**MD-00012385/ MD-00012386 - MachairWind Limited – MachairWind Offshore Wind Farm – Windfarm Development Area - EIA Section 36 consent and Marine Licence Applications Consultation Started**

## Inland Fisheries

Inland Fisheries have no specific comments to make on this EIA Section 36 Consent and Marine Licence Application consultation and recognise that there is no direct impact on DAERA Inland Fisheries interests , however we would make the following comments on offshore renewables in general;

Available evidence suggests that offshore renewable energy developments may affect marine ecosystems through underwater noise, electromagnetic fields (EMFs), habitat alteration, increased vessel activity, and changes to predator–prey interactions. For Atlantic salmon, the greatest potential impacts are associated with the construction phase, particularly pile-driving noise, which may disrupt behaviour, migration, and orientation. Uncertainty also remains regarding the extent to which EMFs from subsea cables may affect salmon navigation and the cumulative effects of multiple developments on migration routes. Turbine foundations can alter habitats and may attract predators, potentially increasing predation risk for migrating salmon, although evidence for these effects remains limited. Overall, a precautionary approach is warranted, including careful site selection, effective mitigation measures, monitoring, and adaptive management to minimise potential risks to Atlantic salmon and the wider marine environment.

## Marine Conservation Branch

Marine Conservation and Reporting Branch has reviewed the Report to Inform Appropriate Assessment (RIAA) documentation relating to the MachairWind Offshore Wind Farm and is content with the findings of the assessment.

We agree with the conclusions presented regarding the potential impacts on MPA features and are satisfied that the assessment has appropriately considered the implications for site integrity. Based on the information provided, we have no further comments to make at this stage.

**Marine Licensing**

Marine Licensing Branch have no comment to make at this stage. As the Regulatory Authority we will only comment on individual projects and on a case-by-case basis.

# Historic Environment Scotland

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Our case ID: 300071933
Your ref: MD-00012385 / MD-00012386
11 September 2026

Dear Marine Directorate

## The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017
## The Electricity (Applications for Consent) Regulations 1990
## The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017

## MachairWind Offshore Development - Section 36 consent

Thank you for consulting us on this Environmental Impact Assessment (EIA) Report and application for consent. We received the consultation on 25 June 2026.

We have reviewed the report and considered the proposed development in terms of our historic environment interests. This covers cultural World Heritage Sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and Historic Marine Protected Areas.

Your cultural heritage advisors will also be able to offer advice on impacts on the historic environment. This may include topics covered by our advice-giving role, and other topics such as unscheduled archaeology, category B and C listed buildings, and conservation areas. From 1 January 2025, we no longer provide advice on undesignated underwater cultural heritage. It is therefore the responsibility of the competent authority to ensure that it has access to sufficient expertise to assess the EIA Report in accordance with the relevant regulations.

### Our Advice

We **object** because the proposed development, as applied for under the Section 36 application and associated marine licence applications, would have a significant adverse impact on the settings of St Mary's Abbey, Iona, monastic settlement (SM12968), and Iona Abbey (LB12310).

These effects would be contrary to policy GEN 6 of Scotland's National Marine Plan (NMP), which requires the settings of designated heritage assets to be appropriately protected.

The proposed development would result in a significant adverse impact on the integrity of the setting of St Mary's Abbey, Iona, Monastic Settlement (SM12968). As such, the development would fail to meet Policy 7(h)(ii) of NPF4, which requires significant adverse impacts on the integrity of the setting of scheduled monuments to be avoided.

In relation to Iona Abbey (LB12310), the development would fail to meet the requirements of Policy 7(c) of NPF4, which states that development proposals affecting the setting of a listed building should preserve its character and special architectural or historic interest.

Consequently, we do not consider that the applications demonstrate compliance with HEP1, HEP2 or HEP4 of the Historic Environment Policy for Scotland (HEPS).

Annex A addresses the application and Environmental Impact Assessment (EIA) Report, setting out relevant considerations, including our previous advice on the proposed development, the policy context, and our concerns regarding the methodology and conclusions presented in the Planning Statement. It focuses on the aspects we consider most significant and which have the greatest influence on both the application and the outcomes of the asset-specific assessments.

Annex B sets out our detailed objection in relation to St Mary's Abbey, Iona, monastic settlement (SM12968), and Iona Abbey (LB12310). It also includes comments on other designated assets within our remit that do not form part of our objection, but for which the applicant has identified likely significant EIA effects. These assets are:

- Oronsay Priory and Cross (SM287)
- Beinn a' Chaisteil, promontory fort and associated remains, Islay (SM13213)
- Dun Bheolain, fort, Islay (SM13214)
- Dubh Artach Lighthouse (LB12320)

Should Scottish Ministers determine that the identified significant adverse effects on the settings of St Mary's Abbey, Iona, monastic settlement (SM12968), and Iona Abbey (LB12310) are acceptable and grant consent for the Section 36 application and associated marine licences, we would require consultation on the Design Specification and Layout Plan (DSLP) (including Design Statement). Whilst this would not mitigate the significant adverse effects identified, it would provide assurance that the final turbine layout and design do not result in greater impacts on these assets than those assessed in the EIA Report.

## Further Information

Decisions that affect the historic environment should take the Historic Environment Policy for Scotland (HEPS) into account as a material consideration. HEPS is supported by our Managing Change guidance series.

We hope this is helpful. If you would like to submit more information about this or any other proposed development to us for comment, please send it to our consultation mailbox, hmconsultations@hes.scot. If you have questions about this response, please contact [Redacted] at j [Redacted] @hes.scot.

Yours sincerely

**Historic Environment Scotland**

# ANNEX A

## The Proposed Development

We understand that the proposed development comprises three development areas:

- the Wind Farm Development Area (WDA);
- the Offshore Export Cable Corridor (ECC); and
- the Onshore Transmission Development Area (OnTDA).

### Wind Farm Development Area (WDA)

This Section 36 application, EIA Report and marine licences relate to the Wind Farm Development Area (WDA), which covers 448 km² and is located off the west coast of Scotland, 12.4 km west of Colonsay and 21 km south-west of Iona.

Based on the wind turbine generators (WTGs) likely to be available when construction starts, the project design envelope includes either 91 larger WTGs, with a blade-tip height of 335 m, or 144 smaller WTGs, with a blade-tip height of 280 m. The associated offshore infrastructure would include offshore substation platforms, fixed foundations with scour protection, and various cable types, where these fall within the WDA application boundary. The EIA Report uses a Rochdale Envelope approach to assess potential environmental impacts.

### Offshore Export Cable Corridor (ECC) and Onshore Transmission Development Area (OnTDA)

We understand that the WDA will connect to a new High Voltage Direct Current (HVDC) switching station that the Transmission System Operator will build near Girvan, and that separate consent and licence applications will be submitted for the Offshore Export Cable Corridor (ECC) and the Onshore Transmission Development Area (OnTDA).

We welcome the fact that the EIA Report explains the assumptions made for the Offshore ECC and OnTDA, including their expected components, so that potential interactions and combined effects can be assessed with the WDA.

## Our Previous Advice

We have engaged extensively on this proposed development over several years. The summary below sets out our consultation responses at recent stages of the process, focusing on our key advice.

### Scoping (November 2024)

At scoping, the proposed development comprised up to 147 turbines (340 m). We identified the potential for significant effects on Dubh Artach Lighthouse (LB12320), noting that the proposed turbines would be readily visible in views from and towards the lighthouse and could significantly affect how its setting contributes to the understanding, appreciation and experience of its cultural significance.

We also highlighted the need for the EIA assessment to give particular consideration to monuments with strong visual connections to the sea, where that relationship contributes

substantively to their cultural significance, as well as to sites with monastic or early Christian associations that may be especially susceptible to effects on their setting. We provided detailed comments on the following assets, but emphasised this was not an exhaustive list:

- Beinn a' Chaisteil, promontory fort, Islay (SM13213)
- Nave Island, monastic site and Viking remains (SM3233)
- Oronsay Priory and Cross (SM287)
- Eileach-an-Naoimh, monastery, Garvellachs (SM90138)
- St Mary's Abbey, Iona, monastic settlement (SM12968)
- St Patrick's Chapel, Tiree (SM6905)

Regarding the assessment methodology, we recommended that the applicant refers to the Environmental Impact Assessment (EIA) Handbook (HES & SNH, 2018) for best practice advice on assessing cultural heritage impacts.

### Pre-application (February - April 2026)

In our February and April 2026 pre-application advice, we acknowledged the proposed Rochdale Envelope approach and the updated range of scheme parameters of 91 to 144 turbines between 280 m and 335 m in he1ight.

A key concern was that the visualisations focused on the lower 91-turbine scenario without a clear explanation of why this represented the worst case for cultural heritage receptors. We advised that primary heritage visualisations should depict a clearly justified worst-case layout and height combination, supported by secondary wirelines and clearer ZTV information showing turbine numbers.

We reiterated that setting should be assessed holistically, considering how surroundings contribute to the understanding, appreciation and experience of heritage assets, and that the cultural heritage assessment would require visualisations specifically designed to assess setting impacts, rather than relying solely on Seascape, Landscape and Visual Impact Assessment (SLVIA) material.

For Iona Abbey (LB12310) and the associated monastic settlement (SM12968), we advised that the development had the potential to affect the ability to understand, appreciate and experience these designated assets. We recommended additional photomontages in our letter dated 20 February 2026 and subsequently requested more detailed visualisations by email on 18 March 2026.

We also advised that further visualisations and assessment were required for Oronsay Priory and Cross (SM287), and for other assets where ZTVs and wirelines indicated the potential for impacts on setting, including Beinn a' Chaisteil promontory fort (SM13213), Nave Island monastic site and Viking remains (SM3233), and Dun Bheolain fort (SM13214).

## Policy Context for the Historic Environment

### National Marine Plan (NMP)

We have assessed the impacts of the proposal on heritage assets within our remit against the relevant policies set out in Scotland's National Marine Plan (Scottish Government,

2015). The principal policy relating to the historic environment is **GEN 6: Historic Environment**, which states:

"*Development and use of the marine environment should protect and, where appropriate, enhance heritage assets in a manner proportionate to their significance*."

In addition, the following supporting policy provisions are relevant to our assessment:

- **Paragraph 4.22**: Marine planning should help to ensure that future marine activities and developments can be carried out in a way that respects the marine historic environment and the setting of important coastal heritage assets. It can also help to increase the social and economic contribution of the heritage assets, for example by encouraging opportunities for public access.
- **Paragraph 4.23**: To achieve this, marine planners and decision makers should consider implications and opportunities for the historic environment taking into account the potential impacts of development and use on:
    - Designated heritage assets – representing sites of national or international significance for which statutory requirements apply. Designated assets should be protected in situ within an appropriate setting. Substantial loss or harm to designated assets should be exceptional and should only be permitted if this is necessary to deliver social, economic or environmental benefits that outweigh the harm or loss.
- **Paragraph 4.24**: Proposals for development and use that may affect the historic environment should provide information on the significance of known heritage assets and the potential for new discoveries to arise. They should demonstrate how any adverse impacts will be avoided, or, if not possible, minimised and mitigated. Where it is not possible to minimise or mitigate impacts, the benefits of proceeding with the proposal should be clearly set out.
- **Paragraph 4.25**: Where the case for substantial change to a heritage asset is accepted, marine decision-making authorities should require applicants to undertake suitable mitigating actions to record and advance understanding of the significance of the heritage asset before it is lost, in a manner proportionate to that significance. The resulting evidence should be made publicly accessible and copies of reports archived with the Royal Commission on the Ancient and Historical Monuments of Scotland and the adjacent Local Authority archaeology service.

Paragraph 4.23 cites Managing Change in the Historic Environment: Setting (HES, 2020) as relevant guidance on setting.

### National Planning Framework 4 (NPF4)

We have assessed the impacts of the proposal on heritage assets within our remit against national policies as set out in the National Planning Framework 4 (Scottish Government, 2023). Part 3 Annex A clarifies that a developer/decision maker should read NPF4 as a whole.

The policies outlined below are not exhaustive; however, they represent those most relevant to informing our position.

The first is **Policy 7(a)**, which reads:

Development proposals with a potentially significant impact on historic assets or places will be accompanied by an assessment which is based on an understanding of the cultural significance of the historic asset and/or place. The assessment should identify the likely visual or physical impact of any proposals for change, including cumulative effects and provide a sound basis for managing the impacts of change. Proposals should also be informed by national policy and guidance on managing change in the historic environment, and information held within Historic Environment Records.

The second is **Policy 7(c)**, which reads:

Development proposals for the reuse, alteration or extension of a listed building will only be supported where they will preserve its character, special architectural or historic interest and setting. Development proposals affecting the setting of a listed building should preserve its character, and its special architectural or historic interest.

The third is **Policy 7(h)**, which reads:

Development proposals affecting scheduled monuments will only be supported where:

i. direct impacts on the scheduled monument are avoided;
ii. significant adverse impacts on the integrity of the setting of a scheduled monument are avoided; or
iii. exceptional circumstances have been demonstrated to justify the impact on a scheduled monument and its setting and impacts on the monument or its setting have been minimised.

Lastly, **Policy 11 (e)** reads:

In addition, project design and mitigation will demonstrate how the following impacts are addressed … vii. impacts on historic environment.

### Sectoral Marine Plan for Offshore Wind Energy (SMP)

The Sectoral Marine Pan for Offshore Wind Energy (Scottish Government, 2020) aims to identify sustainable plan options for the future development of commercial-scale offshore wind energy in Scotland. In 2020, we were consulted on the draft plan and its accompanying Strategic Environmental Assessment (SEA) report. The proposed development lies within the option agreement (OA) area identified in the plan as **W1**. In our response, we noted the potential for effects on the settings of terrestrial heritage assets and advised that these should be considered at the project level:

"*Given the proximity of sections of this OA to the coast, particular consideration should be given to the potential for adverse effects on the setting of terrestrial historic environment assets at any project-level stage*."

*"As with our comments submitted in relation to SW1, the proximity of sections of this DPO to terrestrial historic environment assets, such as forts and religious settlements on both Oronsay and Islay, may mean that wind turbines have the potential to affect the settings of*

*such sites. The mitigation outlined for W1 should therefore ensure that these matters are considered at the project level, alongside the mitigation identified in relation to works within the DPO and the potential coastal effects of associated infrastructure*."

The Sectoral Marine Plan was reassessed in 2025 following an increase in the potential generating capacity of the plan options. In our response, we largely reiterated our previous advice, highlighting the potential for significant adverse effects on the settings of terrestrial heritage assets and welcoming the updated assessment's recognition of this potential within area W1.

While the Sectoral Marine Plan informs decision-making on licence and consent applications, it does not pre-determine outcomes. It is one material consideration among many, and all developments within an OA area remain subject to the standard assessment and consenting procedures set out in the National Marine Plan (NMP).

### Historic Environment Policy for Scotland (HEPS)

We have considered the proposals in light of the policies within the Historic Environment Policy for Scotland (HES, 2019), which is a material consideration for decisions that affect the historic environment. We consider the key policies in this case are:

- **HEP1**: Decisions affecting any part of the historic environment should be informed by an inclusive understanding of its breadth of cultural significance.
- **HEP2**: Decisions affecting the historic environment should ensure that its understanding and enjoyment as well as its benefits are secured for present and future generations.
- **HEP4**: Changes to specific assets and their context should be managed in a way that protects the historic environment. Opportunities for enhancement should be identified where appropriate. If detrimental impact on the historic environment is unavoidable, it should be minimised. Steps should be taken to demonstrate that alternatives have been explored, and mitigation measures should be put in place.

### Managing Change Guidance

We have also referred to our Managing Change in the Historic Environment guidance series, which provides best practice advice for decision makers on applying the policies above. The most relevant document in the series in this case is Managing Change in the Historic Environment: Setting (HES, 2020).

## The Environmental Impact Assessment Report

We consider that the Environmental Impact Assessment (EIA) Report contains sufficient information for us to reach a view on the applications for consent. Our comments below relate to the assessment methodology, mitigation, and the application of relevant policy.

### Assessment Methodology

We had the opportunity to review the proposed methodology for the cultural heritage assessment in October 2024 and responded in our letter dated 27 November 2024. In that response, we recommended that the applicant refer to the EIA Handbook for best practice guidance on the assessment of cultural heritage impacts.

We reiterated this position during our meeting with the applicant on 13 June 2025, when we stated that we expected the assessment to follow the approach set out in the Handbook and that a clear written justification should be provided where the EIA Report departed from that approach. This is reflected in the minute the applicant shared with us on 31 July 2025.

The assessment methodology used by the applicant differs from the EIA Handbook, and it contains statements that we disagree with. Rather than addressing each of these points individually, our comments below focus on the aspects we consider most significant and which have the greatest influence on the application of the assessment methodology and the outcomes of the asset-specific assessments.

### Assessment Matrix

The methodology chapter (Chapter 5) contains a standard assessment matrix for determining likely significant effects, which has been adapted for use in the cultural heritage chapter (Chapter 14). This includes the magnitude of impact table, where Table 5.6 in Chapter 5 has been adapted as Table 14.15 in Chapter 14 (page 88).

The definition of a medium adverse magnitude of impact in Table 5.6 refers to "*considerable, permanent/irreversible changes*". Although this differs from the definition provided in the EIA Handbook, we consider it proportionate to the higher and lower magnitude categories. However, we do not consider the revised definition of a medium adverse magnitude of impact in Table 14.15 to be similarly proportionate, which creates issues in the application of the assessment methodology. Within Table 14.15, a medium adverse magnitude of impact is defined as:

"*Elements of the asset's fabric and/or setting which contribute to its significance are affected, but to a more limited extent, resulting in an appreciable, but partial, loss of the asset's cultural significance*."

By contrast, the equivalent moderate adverse magnitude category in Appendix 1, Figure 1 of the EIA Handbook (page 184) is described as:

"*Changes to the elements of the fabric or setting of the heritage asset that contribute to its cultural significance such that this is substantially altered*."

We consider that the applicant's definition of a medium adverse impact represents a lower level of effect than the equivalent moderate category in the EIA Handbook. We also consider that it is disproportionately low in comparison with the high adverse category in Table 14.15, which refers to cultural significance being "*lost or severely compromised*". As a result, the assessment methodology may understate the magnitude of impacts on the significance of heritage assets arising from changes to their setting.

### Setting

We previously advised that the assessment of impacts on the setting of designated heritage assets should follow the approach in our Managing Change: Setting guidance. This comprises three stages:

- **Stage 1**: identify the historic assets that might be affected by the proposed development

- **Stage 2**: define and analyse the setting by establishing how the surroundings contribute to the ways in which the historic asset or place is understood, appreciated and experienced
- **Stage 3**: evaluate the potential impact of the proposed changes on the setting, and the extent to which any negative impacts can be mitigated

Whilst Appendix 14.3 states that it follows this guidance and recognises setting as "*the way the surroundings of a historic asset or place contribute to how it is understood, appreciated and experienced*" (Page 10), these three factors of setting are not consistently referenced in either the "Present Setting" or "Change to Setting" sections of the assessments. Instead, the assessments frequently describe baseline conditions or refer to visibility without further explanation.

We would expect an assessment based on the approach set out in our Managing Change: Setting guidance to clearly follow the three stages and explain impacts in terms of the three factors of setting. Some assessments refer solely, or predominantly, to understanding in their discussions of the existing setting and changes to that setting. As setting comprises three distinct but related factors, it is insufficient to consider only one of these aspects (for example, understanding) where appreciation and/or experience may also be affected. All three factors are equally important to the setting and cultural significance of a designated asset. Equal weight should therefore be attached to each, and none should be given greater importance over another.

Overall, we consider that Appendix 14.3 does not consistently or effectively follow the staged approach set out in our Setting guidance, particularly in relation to Stages 2 and 3.

We understand that an initial screening assessment was undertaken, corresponding to Stage 1 of the assessment process. However, this assessment does not appear to have been included as an annex to Appendix 14.3, and we are therefore unable to comment on its application of the guidance.

As the assessments do not consistently follow the methodology set out in the Managing Change: Setting guidance, we consider that some of the conclusions regarding impacts on setting are unclear and insufficiently substantiated. We explain below where we disagree with the conclusions reached in relation to specific assets, focusing on those we consider most likely to be affected by the proposed development.

We wish to reiterate that whether or not a site is visited does not change its inherent value or its sensitivity to alterations in its setting. An asset has a setting regardless of whether it is visited, and sites do not need to be visually prominent to have a setting, as explained in the Managing Change: Setting guidance. The degree of preservation is not relevant to how setting contributes to the cultural significance of an asset. Designations, such as those for scheduled monuments, may apply to partial remains that are of national importance (see our Designation Policy and Selection Guidance).

## Mitigation

The EIA Handbook explains that "*one of the main purposes of EIA is to ensure that potentially significant environmental effects of proposed projects are avoided or reduced*"

(page 77). Mitigation plays a key role in achieving this. For cultural heritage, mitigation by avoidance, such as through project design, is the preferred approach within the mitigation hierarchy, followed by mitigation through reduction (page 185).

Despite this, the cultural heritage chapter (Chapter 14) proposes no mitigation measures relating to setting impacts. This includes the embedded mitigation table (Table 14.13, page 84) and the stand-alone setting assessment (Appendix 14.3).

Cultural heritage is briefly considered in the site selection and alternatives chapter (Chapter 4). A 2 nm buffer around Dubh Artach Lighthouse (LB12320) is identified as mitigation for setting impacts in Table 4.5. However, this buffer appears to have been included in response to the Northern Lighthouse Board's request for a 2 nm exclusion zone to accommodate helicopter operations and maintenance vessel access (page 33). The chapter does not explain how the buffer would reduce setting impacts on the category A-listed lighthouse.

Table 4.5 (Cultural Heritage row, impacts on setting of heritage assets) also refers to refinement of the WDA to the north, east and south as mitigation for setting impacts, while incorrectly referring to "SLVIA effects" in one of the columns. Setting is the way the surroundings of a historic asset or place contribute to how it is understood, appreciated and experienced. Assessment of setting is distinct from SLVIA, and a reduction in SLVIA effects cannot be assumed to result in a corresponding reduction in setting impacts. This also applies to other instances in the chapter where cultural heritage is discussed in relation to SLVIA, for example on page 37.

The methodology chapter (Chapter 5) states that where significant effects are identified, additional mitigation measures will be considered where appropriate to avoid, prevent, reduce or offset them (page 22). Despite the cultural heritage assessment predicting significant effects for multiple assets, there is no discussion of mitigation through reduction. While we recognise that opportunities may be limited for a proposal of this scale, particularly where avoidance through design has not been achieved, we would still expect the EIA Report to address this and explain why further mitigation is not proposed. Accordingly, there are no measures relating to setting included in the WDA Mitigation and Commitments Register (Appendix 5).

We consider the absence of any substantive discussion of mitigation for adverse setting impacts to be a significant omission in the EIA assessment, and that the proposed development, as applied for under the Section 36 application and associated marine licence applications, fails to demonstrate compliance with the mitigation requirements of Policy GEN 6 of the National Marine Plan (NMP), Policy 11 (e) vii of NPF4 and HEP4 of the Historic Environment Policy for Scotland (HEPS). The implications of this for our position on the Planning Statement's conclusions regarding design and mitigation are discussed below.

Scottish Ministers may wish to have regard to schedule 9, paragraph 3(2)(a) of the Electricity Act 1989 as part of their decision making on this proposed development (the desirability of protecting sites, buildings and objects of architectural, historic or archaeological interest).

## Design Envelope

Chapter 14 of the EIA Report states that the 91-turbine scenario would normally represent the worst case, as the taller turbines would be more prominent in views. However, it also acknowledges that the denser 144-turbine layout could result in greater impacts in some cases because of turbine stacking (Table 11.5, page 64). It explains that the worst-case layout shown is a "dense edge" layout, with turbines positioned towards the edges of the developable area. This is intended to maximise both the lateral spread of turbines and the potential for stacking, with the worst case considered for each receptor/asset. However, we consider that a layout which does not extend to the edge of the developable area could, in some views, increase the potential for turbine stacking if turbines are positioned more closely together.

Appendix 14.3 briefly addresses whether the upper or lower design parameters are likely to represent the worst-case scenario for each setting assessment. All assessments predict little or no difference in the magnitude of impact between the two scenarios, and several do not clearly identify a worst-case scenario. For example, the assessment of St Mary's Abbey, Iona, monastic settlement (SM12968) states:

"*In the case of this asset, identifying a worst case is very difficult given the distance from the array and the large number and dynamic nature of the views experienced as the viewer moves through the asset group. At the separation involved, any difference in magnitude of effect between the indicative 91 WTG and 144 WTG layouts is limited, but the increased scale and prominence of the larger WTGs, is likely to present the differentiating factor, albeit balanced by the denser layout required for the smaller WTGs*" (page 88).

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

We consider that several of the setting assessments do not clearly identify which design parameters are likely to give rise to the worst-case scenario. However, the inclusion of wirelines for both scenarios is helpful in illustrating the range of potential impacts and provides sufficient visual information to support our assessment of non-compliance with Policy GEN 6 of the National Marine Plan (NMP) and Policy 7 of National Planning Framework 4 (NPF4). Where relevant, we address individual predictions in our asset-specific comments below.

## Post-consent Design Development

Post-consent design development is addressed in Appendix 15, Design Strategy. This explains that the final design for "the Project", including all development areas and associated infrastructure, will be agreed with relevant stakeholders before the relevant consent conditions are discharged. The stated purpose is to ensure that "*the effects of the final scheme will never be greater than those of the [realistic worst-case scenarios] RWCS assessed for EIA purposes*" (page 14).

This process will include the production of a Design Specification and Layout Plan (DSLP), confirming the location and dimensions of all turbines and the production of a Design

Statement. The DSLP will be informed by the relevant design objectives set out in Table 3.1 (page 10). Section 2.4.2 of the Planning Statement also proposes a condition requiring this process (page 10).

Appendix 15 refers specifically to reducing impacts on "nationally important landscapes". Both Appendix 15 and the Planning Statement also refer to consulting NatureScot as the design develops. However, it is unclear whether, and how, post-consent design development will take cultural heritage into account, or whether Historic Environment Scotland will be consulted. Given the likely significant effects predicted for multiple assets within our statutory remit, we would expect both cultural heritage considerations and consultation with Historic Environment Scotland to form part of this process.

As noted above, we consider that several of the setting assessments presented in Appendix 14.3 do not clearly identify which design parameters would give rise to the worst-case scenario. Despite this, the information provided within the EIA Report is sufficient for us to conclude that the proposed development would result in significant adverse effects on the settings of designated heritage assets and would therefore fail to accord with Policy GEN 6 of the National Marine Plan (NMP) and Policy 7 of National Planning Framework 4 (NPF4).

Should Scottish Ministers determine that the identified significant adverse effects on the settings of St Mary's Abbey, Iona, monastic settlement (SM12968), and Iona Abbey (LB12310) are acceptable and grant consent for the Section 36 application and associated marine licences, we would require consultation on the Design Specification and Layout Plan (DSLP). Whilst this would not mitigate the significant adverse effects identified, it would provide assurance that the final turbine layout and design do not result in greater impacts on these assets than those assessed in the EIA Report.

### Planning Statement

Section 5 of the Planning Statement provides the legislative and policy context for the proposed development, including Scotland's National Marine Plan (NMP), National Planning Framework 4 (NPF4) (Scottish Government, 2023), and other relevant policies and statements.

It explains that Chapter 11 of the NMP contains objectives and policies relating to offshore wind and marine renewables. However, we note that Chapter 11 of the NMP states that "*objectives and policies for this sector should be read subject to those set out in Annex B and Chapter 4 of this Plan*". Chapter 4 includes **GEN 6: Historic Environment**, which is not listed in Table 5.1: *NMP General Planning Principles Relevant to the Consenting Applications*, within the EIA Planning Statement. Similarly, Annex 3 of NPF4 makes clear that its policies should be read as a whole.

Our comments below focus on the section of the Planning Statement that is directly relevant to cultural heritage (Section 6.2.5). We note that the Historic Environment Policy for Scotland (HEPS) is not discussed in the Planning Statement. Decisions affecting the historic environment should take HEPS into account as a material consideration. We would therefore have expected the Planning Statement to address how the predicted effects align with this policy.

## Design and Mitigation

According to the Planning Statement, "*the project's design evolution to date and embedded mitigation measures have reduced the effects of the project on designated assets as far as possible at this stage*" (page 55). As discussed above, the EIA Report does not appear to identify, discuss, or propose any embedded mitigation measures to address significant effects on setting.

The statement references embedded mitigation measure M-50 in relation to changes to the setting of heritage assets. However, M-50 in Table 14.13 of the cultural heritage chapter (Chapter 14) refers to "reconstruction ROV or diver surveys". There does not appear to be any setting-specific embedded mitigation included within Table 14.13 of Chapter 14.

We therefore cannot agree with the statement that the project's design evolution and embedded mitigation measures have reduced the effects of the project on designated assets as far as possible at this stage. In the absence of any clearly identified setting-specific mitigation measures, it is not evident how significant effects on the setting of heritage assets have been avoided or minimised through the design process.

## National Marine Plan (NMP)

The Planning Statement interprets Policy GEN 6 to mean that "*the policy requirement is ... to avoid substantial loss or harm*" to designated heritage assets (page 55). This is based on the part of the policy that allows loss or harm in exceptional circumstances where it is necessary to deliver benefits unrelated to cultural heritage. It is an incomplete reading of the policy. We consider that, for the purposes of assessing the proposed development's compliance with cultural heritage policy in the National Marine Plan, regard should also have been given to the requirement that "*designated assets should be protected in situ within an appropriate setting*". In our view, the provisions relating to whether - having identified failure to satisfy the policy requirement regarding protection in situ within an appropriate setting - substantial loss or harm should be accepted in exceptional circumstances, is primarily a matter for the decision-maker.

The Planning Statement goes on to assert that "*harm to heritage assets is a policy concept that has been little used in Scotland but has been the subject of extensive consideration in England, and there is a body of guidance and case law that provides useful context for its discussion and makes it clear that substantial harm presents a high bar*".

The first part of this statement is unsupported. It is also unclear which English guidance and case law are intended to provide context for the discussion that follows, as no sources are cited. The Planning Statement goes on to state that:

"*The test of whether harm would be substantial is independent of valuation of the asset, and therefore reference to criteria used in the EIAR for establishing the magnitude of impact are relevant*"; and

"*As no effects arising through change to setting have been assessed as higher than a moderate magnitude of impact, it is therefore clear that substantial harm would not arise to any designated heritage assets. Therefore, the relevant requirements of the NMP are met and the consenting applications accord with policy GEN 6.*"

As previously explained, we disagree with the definition of a medium adverse magnitude of impact used in the cultural heritage assessment methodology, as we consider it disproportionately low in comparison with the high magnitude category and inconsistent with the approach set out in the EIA Handbook. We discuss how this methodology has been applied in our asset-specific comments below, under the heading 'Our Historic Environment Interests'.

It is also unclear why the value of a heritage asset (referred to as 'importance' in the assessment methodology matrix) should be disregarded when considering policy compliance. The conclusion that substantial harm would be avoided appears to rely on the assessment methodology itself, rather than on a clear explanation of how the significance of the affected assets and the nature of the predicted effects have been considered in policy terms.

We do not agree that the proposed development complies with policy GEN 6 in relation to St Mary's Abbey, Iona, monastic settlement (SM12968), and Iona Abbey (LB12310). On this basis, **we object** to the proposed development as applied for under the Section 36 application and associated marine licence applications, because the settings of these assets would not be appropriately protected. As noted above, our detailed comments on the setting impacts on these assets are set out later in this response.

### National Planning Framework 4 (NPF4)

We disagree with the applicant's conclusions regarding compliance with the National Planning Framework 4 (NPF4), including the assertion that:

"*Given the thresholds in relation to substantial harm are not met, it is therefore also concluded that the integrity of setting would not be significantly affected*" for all assessed scheduled monuments.

This statement implies that conclusions regarding compliance with the National Marine Plan (NMP) can be directly applied to NPF4, without considering the specific requirements of Policy 7.

In considering the integrity of the setting of scheduled monuments, we apply the established definition that:

*"Changes to factors of setting that contribute to cultural significance such that the understanding, appreciation and experience of an asset are not adequately retained will have a significant adverse impact on the integrity of its setting*."

This definition has been considered, discussed and accepted through appeal and public local inquiry processes and is published on our website.

The proposed development would result in a significant adverse impact on the integrity of the setting of St Mary's Abbey, Iona, monastic settlement (SM12968). As such, the development fails to meet Policy 7(h)(ii) of NPF4, which requires significant adverse impacts on the integrity of the setting of scheduled monuments to be avoided.

The EIA Report also identifies significant effects on the settings of two category A-listed buildings, including Iona Abbey (LB12310), but these effects are not addressed in the Planning Statement. In the case of Iona Abbey (LB12310), the development would fail to meet the requirements of Policy 7(c) of NPF4, which states that development proposals affecting the setting of a listed building should preserve its character and special architectural or historic interest.

For these reasons, **we object** to the proposed development as applied for under the Section 36 application and associated marine licence applications.

# ANNEX B

## Our Historic Environment Interests

The proposed WDA infrastructure has the potential to adversely affect the setting of many designated assets within our statutory remit. Given the high number of sites that may be affected by the proposed development, this response does not provide comments on every asset. Instead, it sets out our detailed objection in relation to St Mary's Abbey, Iona, monastic settlement (SM12968), and Iona Abbey (LB12310). It also includes comments on other designated assets within our remit that do not form part of our objection, but for which the applicant has identified likely significant EIA effects.

We understand that an initial screening assessment was undertaken, corresponding to Stage 1 of the assessment process outlined in our Managing Change: Setting guidance. However, this assessment does not appear to have been included as an annex to Appendix 14.3: Settings Assessment. As a result, some of our comments below may relate to matters that were considered during that initial screening stage but are not available for us to review.

The combined assessment of the WDA, ECC and OnTDA in the cultural heritage chapter (Chapter 14) concludes that, as no surface infrastructure is currently proposed for the Offshore ECC, there would be no greater effects on the setting of heritage assets than those already identified in the WDA-only assessment (Chapter 14, page 116). We are content to agree with this conclusion and would welcome the opportunity to review and provide advice on the forthcoming applications and assessments for these elements.

### St Mary's Abbey, Iona, monastic settlement (SM12968) and Iona Abbey (LB12310)

At a pre-application meeting with the applicant in December 2025, we highlighted that the monastic settlement and abbey at Iona have separate scheduled monument and category A-listed building designations. Based on the information provided at that stage, we considered that the proposed development had the potential to affect the ability to understand, appreciate and experience these assets.

Given the relationship between the two assets, we advised that the EIA Report should establish and describe their baseline settings and cultural significance in a holistic manner, while also considering the likely effects of the proposed development on each designation. We further advised that the assessment clearly reference the relevant policy and guidance requirements for scheduled monuments and listed buildings. To assist with this, we recommended following the staged assessment process set out in our Managing Change: Setting guidance.

Stage 1 of our Setting Guidance is to identify the historic assets that might be affected by the proposed development.

Our comments below first set out the history of St Mary's Abbey, Iona, monastic settlement (SM12968) and Iona Abbey (LB12310), together with the designated assets and undesignated features that contribute to their baseline settings and cultural significance, including artistic and intellectual associations.

We then establish the individual aspects of the settings of both assets in relation to their respective designations. This is followed by an assessment of the effects of the proposed development on those settings, including how the assets are understood, appreciated and experienced both individually and as interconnected elements of a wider historic landscape, in line with Stages 2 and 3 of the guidance.

We conclude by setting out the basis of our objection, explaining how the proposed development would result in significant adverse impacts on the settings of SM12968 and LB12310, and how this conclusion is supported by the National Marine Plan (NMP), National Planning Framework 4 (NPF4) and the Historic Environment Policy for Scotland (HEPS).

## Identifying the Historic Assets

The religious complex at Iona contains the remains of a large early medieval monastic settlement founded by St Columba around AD 563, which was superseded by the now-restored medieval buildings associated with the Benedictine Abbey of St Mary founded around AD 1200.

One of the oldest and most important religious centres in Western Europe, and widely regarded as the birthplace of Scottish Christianity, the medieval monastery at Iona survives as a complex sequence of features and buildings added to and adapted over hundreds of years. The abbey was consolidated and then restored from the late 1800s onwards. It now houses an active and vibrant community. The efforts to restore the buildings were in no small part inspired by the recognition of its early origins, the association with St Columba, its impact on Scottish Christianity and Scottish and Irish Gaelic identity. These factors also help ensure its continued reverence and relevance within Scotland's national story, as does the presence of the Iona Community. These associations, together with its setting combines and contributes to its sense of place. Each element in Iona's history contributes to its significance. The site draws thousands of visitors annually from across the world.

The following section describes the history of both assets, together with the designated assets and undesignated features that contribute to their baseline settings and cultural significance, including artistic and intellectual associations. This provides context for the subsequent assessment of the proposed development's impacts on the settings of SM12968 and LB12310, both individually and as interconnected elements of a wider historic landscape.

### *St Mary's Abbey, Iona, monastic settlement (SM12968)*

The scheduled area contains the remains of the early medieval monastery founded by St Columba and much of the wider complex associated with the later medieval abbey, including the footings of the abbey buildings.

St Columba's mission to western Scotland was based on his initial monastic foundation on Iona. Beginning under his guidance, over the next few centuries, the monastery grew to become a large complex of segregated and enclosed spaces, which itself referenced and became part of a complex of sites and monuments across Iona and beyond. There is some evidence to suggest the monastery was laid out over an earlier site.

A large, monumental bank-and-ditch, known as a vallum, initially constructed in the 6th or 7th centuries, encloses the site on all landward sides, with the seaward side bounded by a raised beach to the east. Parts of the vallum survive to a considerable height.

Early medieval written records suggest Columba's monastery contained a church; huts in which the monks worked and slept; a house or houses for guests; and a communal building (likely a kitchen and refectory). Another hut, Tòrr an Aba, situated in a higher place and used by Columba for writing, is also described. Outlying buildings, possibly lying beyond the vallum, included more functional agricultural buildings and dwellings and guest houses for those of low status. The buildings were likely mostly constructed of earth and timber, and the remains of this early medieval monastery now survive only as buried archaeology adjacent to, and probably beneath, the medieval abbey.

The centre of the site was the holiest part of the monastery, centred on St Columba's shrine chapel. In its original form it is the oldest building on Iona. Its foundations suggest a chapel dating to the 9th or 10th centuries, closely resembling some of the earliest Irish stone churches. Originally a detached building, it was incorporated into the Abbey in the mid-15th century and reconstructed in 1962. It is believed that this housed the relics of St Columba and may mark the saint's original burial place. It would have been the main focus of journeys of pilgrimage to the monastery. Burials, including that of Columba, were made throughout the centre of the site during the early middle ages. In front of the chapel and framing the core of the monastery sits a holy well and two remaining impressive high crosses, one of which is now a replica. Several other high crosses and cross bases have been found around this area, suggesting the monastery's core was marked by a concentration of these tall sculptures.

Just outside this cluster of features lies Tòrr an Aba: knoll of the abbot. Archaeological excavation of this small, prominent rocky outcrop has revealed the remains of a small single-celled building, now generally regarded as being the remains of Columba's writing hut mentioned in *The Life of St Columba*, a near-contemporary account of St Columba's life written by Adomnàn, the ninth abbot of Iona, in the late 7th century.

Columba was instrumental in introducing Christianity to the north and west of Britain, first to the Gaelic kingdoms of north-west Scotland, then extending beyond that into the lands of the Picts in north-eastern Scotland. In the 7th century the monastery on Iona played a leading role in the conversion of Anglo-Saxon Northumbria and attained primacy over the Pictish church of eastern Scotland. It held authority over a confederation of churches across Scotland and Ireland, becoming the most powerful of such bodies which emerged in Ireland during the late 6th and 7th centuries. For over two centuries, Iona was one of the most celebrated centres of Scottish and Irish Gaelic religious life.

During this period, Iona held international importance and was in regular communication with the Roman church, with monastic scholars from Iona visiting and influencing religious life and practice across Europe. It was also vulnerable to attacks by Vikings and was raided multiple times in the late 8th and early 9th centuries. In the 9th century, the main Columban community moved to Kells in Ireland and Columba's relics were transferred to Dunkeld, within the heart of the emerging Scottish kingdom. Whilst it retained its associations with the saint, Gaelic culture, and the conversion of Scotland, the Iona monastery and its community

continued as a centre of regional rather than international importance. Survival of a monastic community of the 'Celtic' type continued until the late 12th century.

After the monastery was passed to the reformed Benedictine monastic community, the new abbey buildings became the visual and spiritual focus of the wider monastic complex. Whilst the segregated spatial structure of the earlier monastery began to lose its relevance, the abbey drew inspiration and significance from the presence of the earlier church and its connection to St Columba. Many of the main features that formed the core of the earlier monastery were directly subsumed into the core of the new complex and were referenced by the abbey buildings. The area of the earlier monastery continued to be used to serve the new Benedictine monastic community, as farmland and presumably to house pilgrims and others more loosely associated with the running of the abbey.

The following subheadings describe notable features within the scheduled area of St Mary's Abbey, Iona Monastic Settlement (SM12968).

### *Sràid nam Marbh*

Part of an impressively paved road or causeway is visible to the south of Tòrr an Aba, known as Sràid nam Marbh ('Street of the Dead'). This is the only visible section of a network of routeways leading to the monastery from the south, it was first constructed sometime between the 7th to 10th centuries. The road continued to Port nam Mairtir (Martyr's Bay) which is believed to have been the primary landing point for access to the monastery. A large, mounded feature at Port nam Mairtir, An Eala, contains at least 40 burials that are contemporary with the Columban monastery. The route from Port nam Mairtir to the monastery terminates at St Columba's shrine chapel, which is generally accepted as the central destination of a journey of ritualised Christian pilgrimage across the island, and which was later incorporated into the abbey. A series of medieval high crosses stand or stood next to this routeway. Pilgrims travelled to Iona along maritime routeways and across land, with crosses, chapels and portage sites across the Ross of Mull indicating a complex and regularised pilgrimage route for those that chose to come that way.

### *Reilig Odhráin*

The Reilig Odhráin ('Oran's burial ground') named after St Oran, a cousin and contemporary of Columba, is traditionally believed to be the burial-place of the first kings of Scotland. Irish annals suggest Irish and Norse kings were buried on Iona from the 8th to 10th centuries, while other documents maintain that, throughout the 9th-11th centuries, Scottish kings were buried here. Many of the impressive collection of carved stones may have marked burials from this period. Accompanying these are many belonging to later medieval Gaelic lords. Most early and later medieval funerary monuments known from the monastery and later abbey were originally found in the Reilig Odhráin. The graveyard has continued in use since, most notably for John Smith, a prominent leader of the Labour Party, in 1994.

### *St Oran's Chapel*

St Oran's Chapel, standing within the Reilig Odhráin, was built in the 12th century, but may incorporate an earlier chapel. The carvings over the entrance are of an Irish Romanesque style. It may have been built by Somerled, a Norse-Gaelic lord and the first King of the Isles, or his son Ranald, as a family mortuary or chapel. In the later medieval period, it served as

the burial-place of the MacDonald Lords of the Isles, descendants of Somerled. The south interior wall of the chapel contains a particularly ornate 15th-century tomb recess, likely belonging to one of the first Lords of the Isles.

### *St Mary's Chapel*

This chapel was built sometime after the Benedictine abbey, but its function in relation to the latter is uncertain. A branch of the monastery's medieval road network swung past this building, suggesting it was used primarily by pilgrims visiting the abbey.

### *Tigh-an-Easbuig*

Tigh-an-Easbuig, the Bishop's House, was intact but roofless in the later 18th century and ruinous by the middle of the 19th century. It dates from after 1499 and may be contemporary with the short-lived restoration of the abbey church as the Cathedral of the Isles in the 1630s.

### *Iona Abbey (LB12310)*

Iona Abbey (LB12310) lies within the scheduled area of St Mary's Abbey, Iona Monastic Settlement (SM12968), but is separately designated as a category A-listed building.

The Benedictine abbey on Iona was probably founded by one of Somerled's descendants around 1200. With an impressive Romanesque church at its core, it is by far the largest and most elaborate ecclesiastical monument in the West Highland area, denoting the wealth, cultural connections, and aspirations of its patrons, the Kings of the Isles and later the MacDonald Lords of the Isles.

The buildings conform to a standard lay-out with the cloister being enclosed by an east range containing the Chapter House and monks' dormitory, a north range containing the refectory with the Abbot's House and reredorter located to the north and west range which was built in the 20th century replacing an earlier range that contained the kitchen. The remains of the bakehouse are visible to the west of this range. The front of the abbey enclosed and symbolically embraced St Columba's shrine. Its entrance aligns with the core of the earlier monastery, including the shrine, Tòrr an Aba and the high crosses at the end of the pilgrimage route. The frontage and entrance into the abbey were further accentuated by the height of the surrounding walls, stone sculpture, and architectural details surrounding the doorway and those around the windows above. These would have accentuated the entrance to the abbey as a backdrop to the group of features immediately in front of it and welcomed pilgrims to worship in the interior. It is noteworthy that the claustral ranges lie to the north of the church rather than the more conventional south (a church to the north, being the tallest structure, avoids blocking light and warmth to the cloister). This was probably done either to capture water from a nearby burn for the reredorter, or to avoid pre-existing areas of significance relating to the earlier monastery.

The church was built in the Romanesque style during the first two decades of the 13th century, probably by Irish stonemasons, with a cruciform layout. Prior to completion, the chancel was extended to form an aisled choir above a crypt. This likely reflected the growing community as domestic quarters were built as part of the cloistral complex in the

13th century. The use of dog-tooth ornament during this phase suggests that masons from eastern Scotland were present.

An enlarged south transept was proposed, possibly to house a crypt and occupy two storeys and/or to accommodate pilgrims viewing the church's relics; only the footing of the walls was laid before work was abandoned.

By the early 15th century, the church was in poor condition and major repair and alterations were undertaken. The east wall of the choir and the entire south wall of the church were demolished and rebuilt to provide a wider nave and choir, and a south aisle to the choir. The central tower and caphouse, one of the most impressive and visible features of the church, were built at this time. This work was likely overseen by Donald Ó Brolchán, an Irish master mason, whose signature appears on one of the capitals of the crossing piers.

The church was embellished with fine traceried windows and rich carving, notably a frieze of religious and genre scenes decorating the capitals of the south choir arcade. The appreciation of foliate decoration as well as cusped ogee arches can be seen across the artistic output of Iona at this time; in the sedilia in the presbytery, in the canopied tomb in St Oran's and on the grave slabs. This highlights the influence of the Iona and West Highland schools of monumental sculpture.

Michael Chapel, which stands separate from the main body of the abbey, probably also dates to around 1200 and would have allowed worship to continue while the abbey was being constructed.

The abbey buildings became derelict following the Reformation in 1560, although attempts were made to retain its relevance within a reformed Gaelic church, patronised by the Campbells, who had eclipsed the MacDonald Lords of the Isles, and to a lesser extent by the MacLeans. The position of Bishop of Iona and the Isles was retained, and Columba reenvisaged as a practitioner of a pre-Catholic Protestantism. An attempt was made in the 1630s by bishop Neil Campbell on behalf of Charles I to restore the eastern parts of the church for use as a Cathedral of the Isles. The reuse of the church was short-lived as by 1693 it passed into the ownership of the Argyll family. Parts of the church building began to collapse in the 18th century, with the 3rd Duke of Argyll taking steps to protect the ruins. It was during this time that the existing boundaries of the abbey were established.

As early as the 18th century the Abbey, including its church, had gradually deteriorated into the romantic ruins beloved by visitors touring the Scottish Highland and Islands. Famous visitors included Walter Scott, William Wordsworth and Prince Albert and Queen Victoria (the latter staying/sketching from the boat). Iona became a place of antiquarian curiosity that inspired writers and artists.

A comprehensive restoration of the ruins was undertaken for the 8th Duke of Argyll in 1874-6 by the renowned architect Robert Rowand Anderson between 1874-6. In 1899, the Duke of Argyll donated the Abbey and other buildings to Iona Cathedral Trustees on the basis that the church would be restored as a place of worship. The abbey complex then underwent a sequence of restorations beginning in 1902. These were aided by leading Scottish conservation architects of the time including Thomas Ross, John Honeyman, and

Peter MacGregor Chalmers. The Iona Community, established by Reverend George MacLeod, undertook restoration of the remaining abbey buildings began in the late 1930s, led by architect Ian G Lindsay, which was completed by 1965. The restoration work retained the raw masonry of the ruins to evoke connections to the original Benedictine abbey and Columba's earlier monastery.

### *Other Designated Assets and Undesignated Features*

#### *Cladh an Diseart (SM804)*

Cladh an Diseart ('Burial ground of the Hermitage') is the remains of a small rectangular building, probably a chapel, set within an enclosure. The site's name suggests these remains stand on or close to the site of the 'dìsirt', a word evoking the desert hermits that exerted huge influence on early Christianity, whose practices Columba and many members of the Iona monastic community sought to emulate. This indicates that this site was a place of retreat for members of the community, and it was named in relation to the monastery in 1164. Although designated as a separate scheduled monument to the north of St Mary's Abbey, Iona Monastic Settlement (SM12968), it forms part of the wider monastic complex.

Cladh an Diseart is about 200m north of the monastery's outer vallum and below the raised terrace where the monastery was built. Its setting is marked by its separation from the larger monastic complex to the south. The sense of isolation is enhanced by the open fields surrounding it, and by the sea nearby, but the monastery can be seen to its south, visually connecting these two places of contemplation.

#### *Iona Nunnery (SM90350)*

The nunnery is a modest collection of buildings, built around three sides of a cloister, served by a small chapel included in one of the ranges. It was built shortly after the abbey, although slightly enlarged in the late 1400s, and closely associated with the same family of patrons. It is one of only two Augustinian nunneries in Scotland and probably only ever housed a small community. Excavations have recovered high status domestic goods associated with the later community. The community survived until the Reformation.

Amongst Iona's collection of later medieval carved stones are some of the few representations of medieval Gaelic women, including a Prioress.

Whilst one of the building ranges is well preserved the rest of the nunnery is now ruined and a large part tended as a garden providing a quiet retreat for modern visitors.

The nunnery is a dominant presence on the modern route from the ferry to the monastery, mirroring its place on historic routeways. Pilgrims and visitors see a relatively stark wall containing three small windows, one capped with a carving of a sheela-na-gig: an enigmatic yet provocative female figure. From the nunnery the monastery is highly visible and vice versa. This reciprocal visual referencing is likely to have been deliberate.

#### *St Ronan's Church*

Beside the nunnery stands St Ronan's Church, which is now contained within the same walled enclosure and forms part of the same designation. St Ronan's served as the later medieval parish church for the island's inhabitants but was built on the site of one of the

earliest dated chapels on Iona. It remained in use as a graveyard for women and children into the 18th century.

### *McLean's Cross (SM90173)*

This 15th century cross, bearing ornate carvings in the West Highland style, is situated close to the junction of three medieval streets. Standing up to 3m high it marks the route between the coast and the monastery. It appears to have been commissioned by the MacLeans of Duart, who were increasing their powerbase in the area at the time.

### *Dún Í*

This natural hill is the highest point on the island, despite being only 100m above sea level, and lies to the northwest of the monastery. Early medieval writing records it being visited by St Columba and his acolytes, where the saint notes a storm passing to Ireland and then performs a miracle to save those affected by the storm. From the top of the hill there are wide sweeping views across Iona, the Inner Hebrides and out over the sea beyond.

### *St Columba's Bay*

St Columba is said to have landed on Iona at this bay on the south end of the island, before setting up the monastery to the north. It sits separate from the monastery and modern settlement and has been visited and venerated by visitors since at least the late 1600s. Small acts of worship and sculpture are visible around it. Its exposure to the sea and wide-open views southwards across the sea and towards Ireland accentuate Columba's connections to and separation from Ireland. It tells an important part of Columba's and the monastery's story.

### *Artistic and Intellectual Output*

The artistic and intellectual output of the early medieval monastery on Iona is of international significance and most clearly articulated in the stone sculpture and texts of the early medieval period. Some of the earliest post-Roman texts written in the British Isles are likely to have been made on Iona. These include the *Cathach*, probably written in Columba's own hand; and the Book of Kells, the most elaborate and accomplished existing Hiberno-Saxon gospel book. It has been suggested that the Book of Kells was created to commemorate the 200th anniversary of Columba's death, or possibly the enshrinement of his remains about AD 750. Iona is also one of the earliest monasteries in Europe to produce annals. Scholars have also suggested that the Book of Durrow was written on Iona.

Adomnàn's *Life of St Columba*, probably written on Iona, is one of the most important surviving documents providing insights into early Scottish and Irish Gaelic history. A now lost *Iona Chronicle* that survives in fragments in other documents had a similar impact. Adomnàn's *Law of the Innocents* is cited as the first human rights document, which influenced all that followed – demonstrating the worldwide and continuing impact of the monastery.

Iona's collection of Early Christian carved stones is one of the largest in the British Isles and Ireland, surpassed only by that at Clonmacnois, in Ireland. Iona is likely the place of origin of the ringed or Celtic cross, a symbol now recognised globally. Iona's freestanding high crosses, three of which are reconstructed in the abbey museum, with a replica of one and

an original still standing in their original position, represent an early and experimental form of sculpture not derived from any tradition of established stone carving. Dating from the 8th and 9th centuries, these crosses were almost certainly carved on Iona. St John's Cross, the prototype ring-headed high cross, is the first of its kind anywhere in the world. These stood in front of St Columba's shrine and the abbey. Visible along the route into the core of the abbey, they served as a focal point for the pilgrimage, a point of prayer at the end of the journey and helped focus the transition into the holiest part of the monastery.

Inherent structural weakness led to the final and irreparable collapse of St John's cross in 1957. The existing category A-listed cross (LB52541) is a reinforced concrete replica erected in 1970. Its construction is a technical/engineering achievement and the cross itself is unique as a full scale, accurate replica in the same location as its original, early medieval predecessor.

Stone sculpture on Iona saw a resurgence during the 14th to 16th centuries in the form of West Highland grave slabs and effigies. Broadly associated with the Lords of the Isles, Iona has an exceptionally high concentration of about 150 grave slabs, many now located in the abbey museum and cloisters. The effigies represent either warriors or abbots, some identified by surviving inscriptions. They are an evocative symbol of Gaelic arts and culture.

Whilst earlier crosses also marked the route into the monastery from the landing point, the most impressive, surviving example, McLean's Cross (SM90173), belongs to this later period.

The sense of history and spiritual associations, connections to the Gaelic world and Columba, together with the living religious community at Iona, adds considerably to its cultural significance. As the birthplace of Scottish Christianity, it holds an iconic place in the national story and consciousness.

### Defining the Setting of St Mary's Abbey, Iona, monastic settlement (SM12968)

The monastery of Iona was constructed on a relatively flat terrace sloping eastwards to the Sound of Iona. It is bounded by a raised beach to the east and craggy, low hills to the west. The close proximity of the Ross of Mull, with the Sound of Iona in between, strongly emphasises the island's distinct separation from the land around it. This sense of separation is reinforced by views up and down the sound, where the open ocean is strongly framed by the land on either side of it.

Perceived remoteness and the concept of spiritual and social isolation were important to the early church across the Christian world. While the monastery was constructed to evoke a sense of seclusion and remoteness, travel and journeying are nevertheless central to Iona's story. Columba travelled from Ireland to found the monastery, using it as a base to travel to even more remote island hermitages throughout the western seaboard, communicate with secular powers, particularly in Argyll, and to go on further to bring in others into the Christian fold. Pilgrimage became one of the core purposes of Iona, with countless pilgrims visiting the site in the centuries that followed. This practice continues today, with people of a variety of faiths and of no faith now visiting the monastery in varying acts of pilgrimage.

Whilst acting as a boundary, the sound simultaneously functions as a link, providing connections between Iona and the wider world. Crossing the sound is the final stage of an often-arduous journey for pilgrims and other visitors and heightens the anticipation of arrival.

Most travellers to Iona arrive on the Fionnphort ferry, across the sound, which has been used as a crossing point for visitors since the early medieval period. The modern-day journey to the monastery broadly mirrors this historical route of pilgrimage both in layout and experience. Crossing the sound elicits a clear sense of crossing a boundary and building anticipation. It also demonstrates Iona's separation from its surroundings, with the open ocean visible to the north and the south as the island is approached.

From the 7th to 9th centuries, Iona was monumentalised to create a complex devotional landscape defined by monastic enclosures, chapels, burial grounds, high crosses, and shrines. Recent research suggests that the liturgical landscape of the monastery on Iona was developed to mirror the heavenly Jerusalem in its layout. The journey along a paved roadway from the landing point, generally thought to be at Port nam Mairtir, to its terminus at St Columba's shrine chapel, provides a metaphor for pilgrimage to Jerusalem.

The modern tarmacked road running north through Baile Mòr, just to the north of Port nam Mairtir, broadly replicates the historic routeways that led to the monastery. The journey along this road was punctuated by various ecclesiastical buildings and monuments, with surviving elements including Iona Nunnery, St Ronan's Church, McLean's Cross, and St Oran's Chapel, before finally arriving at the site's core, focused on St Columba's shrine chapel. This journey is fundamental to the modern visitor's understanding, appreciation, and experience of the monument, giving a strong impression of the historic route of pilgrimage made by people in the medieval period.

The processional route ends in front of the abbey. With the establishment of the new Benedictine community, the abbey was deliberately placed at the sacred core of the earlier monastery. The impressive and ornate masonry abbey church and associated monastic buildings became a dominant visual focus from within and across the wider monastic complex. Drawing significance from the earlier church and its connection to St Columba, it incorporated and referenced many of the principal features of the earlier monastery. Together, the abbey and the core of the earlier monastery became, and remain, key visual and spiritual elements of the monument's setting. However, the connections to the earlier monastery remained significant.

Tòrr an Aba, probably the location of Columba's writing hut, gives views across most of the monastery and highlights its island context with the ocean visible to the north, east, and south. The view from Tòrr an Aba allows for an understanding of the clear sequencing of the pilgrimage journey from Port nam Mairtir, with the area of the ferry terminal, the Reilig Odhráin, St Oran's Chapel, Sràid nam Marbh and St Columba's shrine chapel all visible. The open ocean is framed in the view south by Mull's coastline and Iona's craggy interior: Sràid nam Marbh draws the eye in that direction, with St Oran's Chapel serving as a useful contextual marker beneath the horizon.

More widely, views south from within the core of the complex, across and out of the sound, look towards where Columba would have arrived from Ireland. It is also the route taken by pilgrims and modern-day visitors. The views out of the sound, over the sea to the horizon, accentuate the spiritual connections between Iona, western Scotland, and Ireland, and the strength of cultural and maritime connections. In many views from within the complex, St Oran's Chapel and St Martin's Cross are prominent, with the open ocean visible between or behind them, directly behind Sràid nam Marbh.

The modern road in the north of the island provides expansive views of the entire monastery in its wider context, with the Sound of Iona behind and the open horizon to the south. Visitors returning from the north of the island can gain a clear understanding of how the various components of the monastic complex relate to one another, as well as an appreciation of the site's evolution through time. The massive remains of the vallum stand to the right, while Tòrr an Aba, St Oran's Chapel and Tigh-an-Easbuig are all visible. The sea both frames these views and is framed by the surrounding landforms, clearly articulating the monastery's insular location and evoking both the sense of sea-girt separation from the world beyond and Columba's journey from Ireland beyond the horizon. This sense of separation is especially apparent from the eastern parts of the monastery, around the edges of the raised beach defining its eastern boundary, and from Cladh an Diseart.

Iona was seen by its monks as being 'at the edge of the Ocean' and 'at the limit beyond which no-one dwells'. The monastery's sense of separation from the world around it can be most clearly appreciated from the higher parts of Iona, particularly Dùn Ì, from which the entire island is visible. The wide, open expanse of the Atlantic is visible in an arc from the south to the north. The *Life of St Columba* describes how Columba himself climbed Dùn Ì, where he witnessed a storm passing towards Ireland. The view across the monastery and the rest of the island is likely to be broadly similar to that which would be seen during Columba's lifetime.

As well as establishing the island's clear separation from its surroundings, views from Dùn Ì also give a clear outlook towards Columba's Bay at the south of the island and the open horizon, towards Ireland, beyond. Columba is traditionally said to have landed in this bay, choosing Iona for his monastery because Ireland was now no longer in sight. This tradition is first recorded in the 18th century and, while Ireland's invisibility from Iona may not have factored into Columba's motives for founding his monastery here, this story is closely associated with subsequent perceptions of his world view and links to Ireland. The wider views across the sea to the southern horizon are therefore an important part of the understanding, appreciation, and experience of Iona.

In addition to the sense of separation, outward views from the monastery are deeply impressive, with the expansive seascape, distant hills and dynamic skies contributing to their scenic quality. The absence of large-scale modern development contributes to this, and to the historic character of these views.

Key factors of the scheduled monument's setting include:

- Views towards Iona and the monastery when crossing the Sound of Iona.
- The monastery's coastal and island location.

- Reciprocal views along the route between the monastery and Port nam Mairtir and Baile Mòr.
- The sense of perceived remoteness and separation from the outside world.
- The sense of being bounded by the sea, with wide open views out of the sound to the open horizon beyond.
- Views towards Ireland, hidden beyond the horizon.
- The reciprocal relationship with the abbey.
- Views between the various elements of the monastery, with the Sound of Iona and the sea beyond.
- Views across the monastery and its wider surroundings from the northern parts of the monument
- Views across the monastery and its wider surroundings from Cladh an Diseart
- Panoramic views across the monument, Iona, the western horizon and seaboard from Dùn Ì.

### Defining the Setting of Iona Abbey (LB12310)

As with the monastic monument, most travellers to Iona arrive on the Fionnphort ferry, across the sound which has been used as a crossing point for visitors since the early medieval period. The modern pilgrimage route broadly mirrors the historic approach. The abbey's increasing prominence along this route, first visible from Mull and then drawing closer during the sound crossing and approach through Baile Mòr, makes it an important landmark and the culmination of the journey.

The church assumes increasing visual prominence along the southern approach as distance and partially screened views are replaced, culminating in unobstructed views of the church upon arrival. This unfolding of views creates a sense of anticipation. The church's prominence, expressed through its robust architectural character including its massing, form, and distinctive features, such as the tower, communicates its architectural and historic importance within the site.

The processional route ends at what is now the abbey forecourt; this is a highly significant part of the site. Its importance is reflected in a number of features and structures of Early Christian origin, their antiquity and connection to St Columba adding to the sanctity of this space, including St Columba's Shrine Chapel; the high crosses of St John, St Martin and St Matthew; the well; the bullaun (prayer) stones; the trough known as the "Cradle of the North Wind"; and Tòrr an Aba. The high crosses not only monumentally demarcated the entrance to the centre of the site at the end of the pilgrimage journey, but they also provided a focus for prayer and meditation.

The front of the abbey encloses and symbolically embraces St Columba's shrine. Its entrance is aligned with the core of the earlier monastery, including the shrine, Tòrr an Aba, the high crosses and the end of the pilgrimage route, reinforcing the continuity of religious significance and activity across the site. As the abbey evolved from and incorporated the core of the earlier monastic settlement, the monastic site itself is a key component of the abbey's setting.

Views south from the core of the abbey complex, across and out of the sound, look towards where Columba would have arrived from Ireland. It is also the route taken by pilgrims and modern-day visitors. The views out of the sound, over the sea to the horizon, accentuate the spiritual connections between Iona, western Scotland, and Ireland, and the strength of cultural and maritime connections. In many views from within the complex, St Oran's Chapel and St Martin's Cross are prominent, with the open ocean visible between or behind them, directly behind Sràid nam Marbh.

From the front of the abbey, attention is also focussed east; towards St Columba's Shrine Chapel, the 'front' of the high crosses and the entrance elevation of the church. This east-facing direction follows the long-standing Christian tradition of orienting churches towards the rising sun, in expectation of Christ's resurrection. In these views, the Sound of Iona and the hills of Mull form the backdrop. This visually and symbolically connects the abbey to the east.

The church interior conveys the sombre and reverential character of the sacred space. Built as a place of worship, its design corresponds to its function; the church is orientated in the accepted direction of veneration with windows placed above eye-level to focus the monks (and visitors) attention on the altar in the presbytery. There is therefore a limited relationship between the interior of the church and outwards views.

Similarly, the design, position, and orientation of the cloister garth and conventual ranges provide inward-facing views. The architectural character of the abbey (as a whole) creates an enclosed, secluded and contemplative atmosphere that reflects internal monastic life. Outward views from east range buildings are limited to axial views to Mull due to their recessed position in relation to the abbey choir and the now museum building. The contrast between the abbey's enclosure/inward focus and open, coastal surroundings is part of the abbey's spatial experience.

Key factors of the listed building's setting include:

- Views towards the abbey when crossing the Sound of Iona.
- The abbey's coastal and island location.
- The abbey's increasing visual prominence along the approach.
- The role of the abbey as the culmination of the pilgrimage route.
- The reciprocal relationship with the monastic site.
- The visual and symbolic relationships with the Sound of Iona, Mull and the east.
- The relationship between the church and the cloistral buildings.

### Shared Setting and Relationship Between SM12968 and LB12310

The medieval abbey precinct is now defined by a rectilinear enclosure of ha-has, which encompasses a smaller area than the early medieval monastery. The monastery had an outer vallum that extended much further north into what is now pasture between the abbey and Grianan. This feature remains clearly visible to the west and north-west as a massive upstanding bank and ditch, and its line can be seen continuing through the field north of the abbey. Views south across this area allow for the expansive size of the early medieval monastery, and its spatial contraction into a later medieval Benedictine foundation, to be

understood, appreciated and experienced. The Sound of Iona and the abbey are dominant in these views, with both the north and south mouths of the sound visible.

The modern road to the north of the island provides expansive views of the entire monastery in its wider context with the Sound of Iona behind and the open horizon to the south. Visitors today can appreciate this view when returning from exploring the north of the island and can gain a clear understanding and appreciation of how the various components of the monastic complex relate to each other, as well as the monument's evolution through time. The massive remains of the vallum stand to the right, with Tòrr an Aba, St Oran's Chapel, the reconstructed abbey, and Tigh-an-Easbuig all visible. The abbey, at the core of the monastery, dominates and provides a focal point in views down the coastline and over the open southern horizon. The sea both frames these views and is framed by the abbey and Cnoc nan Carnan, clearly articulating the monastery's insular location and evoking both the sense of sea-girt separation from the world beyond and Columba's journey from Ireland beyond the horizon.

This sense of separation is especially apparent from the eastern parts of the monastery, around the edges of the raised beach defining its eastern boundary, and from Cladh an Diseart, where views emphasise the relationship between the monastery, the abbey, the Sound of Iona and the surrounding seascape.

Iona has seen a growth in settlement since the monastery was in use, mostly in the 19th - 21st centuries. In the main, this later development is small and largely domestic in scale and set low down or to the back of views out from the monastery, being largely clustered around the ferry port within Baile Mòr, alongside the roadside between it and the monastery or scattered to its west. It does not feature significantly in views out from Dùn Ì and is absent in views from St Columba's Bay. Although modern settlement is visible in some views, its limited scale, dispersed pattern and generally low-profile character mean that it does not substantially detract from the appreciation of the monastery or the abbey's historic or island setting.

In summary, the monastery is an unparalleled example of a medieval monastic foundation with religious activity spanning more than a thousand years. The evidence for its exceptional importance is enhanced by an exceptionally rich archaeological and historical record. The characteristics that made Iona a suitable location for a major monastic foundation can still be readily appreciated through views from, towards and across the monument. The rationale for placing the monastery here can be readily understood, appreciated, and experienced in a variety of views from, towards, and across it. Many of these views, including over the horizon towards Ireland, are themselves laden with deep historical significance and religious meaning.

The reconstructed abbey remains the visual and spiritual focus of the wider monastic complex, its prominence reinforcing its role as the culmination of the historic pilgrimage route and the centre of religious life on the island of both the monastery and the abbey. Iona's setting evokes the spirit of St Columba and possesses a powerful sense of place, created by the interplay of its landscape, seascape, archaeological remains and ecclesiastical buildings. This setting is fundamental to the cultural significance of both assets and is highly sensitive to change.

Key shared factors of setting include:

- Reciprocal views between the abbey and the wider monastic complex.
- Views towards and out from the core of the religious complex, including the reciprocal relationship with the pilgrimage route and the crossing from and back to Mull.
- Views south across the Sound of Iona, including outwards towards Ireland and western Scotland.
- The site's coastal and island setting, and its relationship with the surrounding seascape.
- The sense of perceived remoteness and being bounded by the sea, with wide open views out of the sound to the open horizon beyond.
- The ability to understand the extent and evolution of the monastic complex through time, including the reciprocal relationship between the early medieval monastery and the later abbey.

## Assessing the Impact of the Proposed Development

### *The EIA Assessment*

The assessment of impacts on the settings of St Mary's Abbey, Iona, Monastic Settlement (SM12968) and Iona Abbey (LB12310) in Appendix 14.3 largely considers the two assets together. Impacts on both assets are assessed primarily under the scheduled monument heading on page 78, while the predicted magnitude of change and significance of effect for the listed building are addressed in a supplementary paragraph on page 144.

The applicant's assessment is largely contained within Section 1.6.1.5 of Appendix 14.3. In Paragraph 125, the applicant includes a list of key views identified by HES prior to the application being submitted. This appears to misunderstand the intent of our letter of 20 February 2026, which highlighted a number of setting factors that, based on the limited visualisations available at that stage, appeared likely to be affected by the proposals. The examples provided were not intended to represent a comprehensive assessment of the settings of either the scheduled monument or the listed building. The letter also emphasised the importance of considering the monastery as an interconnected whole, comprising a range of related features and places, rather than as a series of separate entities.

The applicant places a strong emphasis on HES's Statement of Significance for the Property in Care (the area it cares for and manages on behalf of Scottish Ministers), which articulates aspects of its cultural significance. While we encouraged the applicant to refer to this, the Statement of Significance relates only to the area in the guardianship of Scottish Ministers. This area is defined by the boundary wall around the Reilig Odhráin and the ha-ha enclosing the abbey. Additionally, whilst containing helpful information, Statements of Significance are produced to assist HES in the management of its estate. When considering proposals, we advocate a broader approach that considers all aspects of an asset's cultural significance and relies on the relevant policies and guidance for managing change in the planning system.

For instance, the applicant's assessment notes that the only view of importance mentioned in the Statement of Significance is that to the east across the sound to Mull and the

direction where Christ is meant to arise on the day of judgement. This becomes the main focus for their assessment of impacts. This substantially underplays the complexity of the monastery's setting and contribution that wider views make to that.

The applicant suggests the historic act of pilgrimage is difficult to reconstruct. This seems to ignore the surviving historical and cartographic evidence and the pattern of surviving monuments that mark that journey.

The applicant's conclusions appear to rely on a very narrow interpretation of what constitutes a view. They seem to suggest that when looking at a specific feature it is only that feature which forms the view: they cite the view of St Columba's Shrine from Tòrr an Aba as an example. However, this does not reflect real world experiences. Views are framed by what lies around them, views change as people move around a site and, in the case of views our from Tòrr an Aba, there are a variety of related features to appreciate at any one time, where the viewer looks around, through and over the assets to appreciate them as a grouping within their setting.

Where the applicant refers to what they call the far horizon or the 'ever present sea' they emphasise this as a distant background to the 'principal foci of views'. They place a similar emphasis on specific views of features, such as the abbey in views from the ferry or the journey up from it, noting that the viewer would need to turn to perceive their wider surroundings of the location of the proposed development. However, an asset's setting is often perceived in the round, especially when moving around or where the wider views contribute to an overall sense of place.

Whilst acknowledging that the absence of the modern contributes to the sense of romanticism and spirituality, when assessing these views, the applicant focuses instead on the foregrounding of buildings and topography, suggesting that the prominence of buildings, modern infrastructure on the island and other landscape features restrict outward views. This over-emphasises the presence of modern settlement in these views and again ignores the contribution of wider and longer distance elements to these views.

When assessing impacts the applicant also appears to focus on what cannot be seen, regularly noting that half of the proposed development would be obscured, rather than the impacts of what would be visible and what the impacts of those might be.

The applicant acknowledges the symbolism of views towards Ireland for the monastery in that 'the sense of another place beyond the horizon becomes significant' but does not assess the proposals' impacts on this. When considering the impacts on the views from Dùn Ì, they again focus largely on the views towards the monastery and note that many of the other features referenced are not directly visible, seeming to dismiss the relevance of the panoramic views, the importance of the horizon and the associations with the locations not directly seen both in Iona and across it.

The applicant makes numerous references to intervening trees and buildings as screening parts of the proposals or otherwise reducing its impact. As noted in our Managing Change: Setting guidance, vegetation cannot necessarily be relied upon as screening as it is subject to felling and seasonal changes.

Taken together, these aspects of the applicant's assessment downplay both the contribution of the wider setting to the monastery's and the abbey's cultural significance and the impacts of the proposals.

The applicant's assessment of the impacts on Cladh an Diseart is not clear. They seem to place an emphasis on the visitor experience of the asset group, noting, correctly, that there is no access provided to it. This appears to confuse access with the impacts on significance and/or setting. In this case its setting relies on its remoteness and separation from the rest of the monastery.

The applicant suggests that the proposals would not affect the relationship between Iona and Ireland because the latter cannot be seen and notes that views towards the abbey, and back from it towards Mull, would not be affected.

In conclusion, the applicant predicts a low adverse magnitude of impact, resulting in a moderate adverse significance of effect for both the scheduled monument and listed building, which is significant in EIA terms. Whilst we agree that the overall predicted significant EIA effect is appropriate, we disagree with the assessment of the setting of both assets and the conclusions about the proposals' potential impacts in relation to compliance with the National Marine Plan (NMP) and National Planning Framework 4 (NPF4).

The applicant has concluded that any difference in the effect between the two layouts (composed of either 91 and 144 turbines) on the setting of the scheduled monument would be limited, and that identifying any difference is challenging due to the distance between the proposals and the monastery. It seems unlikely that differences in height would be appreciated at this distance, but differences in layout would be perceived, through the spread, density and distribution of turbines, especially for the 144-turbine scheme. The potential impacts of this have not been assessed by the applicant. There is also no discussion of the worst-case scenario in relation to the listed building.

### *Our Assessment*

#### *Impacts on the Setting of St Mary's Abbey, Iona, monastic settlement (SM12968)*

The proposals would result in changes to factors of setting that contribute to the cultural significance of the scheduled monument such that the understanding, appreciation and experience of the monument would not be adequately retained.

The information supplied in support of the application indicates that the proposals would be visible in their entirety for most of the ferry crossing from Fionnphort to Baile Mòr. SLVIA Figure 16.2.21 indicates that almost all of the scheme, including the substation, would be visible from Fionnphort as the journey across the Sound of Iona commences. Turbines would fill the empty horizon visible to the south and be framed by topography on either side of the sound. Figure 20 (Appendix 14.3) depicts a similar view from a position much closer to the slipway at Baile Mòr, demonstrating a similar level of impact when arriving on Iona. The currently open, empty horizon to the south would therefore be filled with turbines for the entirety of the ferry journey, undermining the sense of remoteness and separation of the monastery from the surrounding world. This would also disrupt its relationship with the absent Ireland articulated by the empty horizon.

The proposals would be highly visible in reciprocal views when looking south and returning back from the monastery towards Baile Mòr. The turbines would be visible behind the nunnery on approaches to it from the north, detracting from the presence of both McLean's Cross and the nunnery in these views. This would also undermine the relationship between the landing points at Port nam Mairtir and Baile Mòr, and the monastery.

Cultural Heritage Figure 9 (Appendix 14.3) demonstrates that the proposals would be highly visible in views to the south from Tòrr an Aba. The turbines would appear in the carefully constructed visual relationship between this part of the monastery and Sráid nam Marbh, the Reilig Odhráin, St Oran's Chapel, St Columba's shrine chapel and the high crosses. By being prominently visible on the southern horizon in this location, the turbines would detract from these visual relationships, drawing the eye, while simultaneously disrupting the site's relationship with the absent Ireland on the currently-empty horizon.

Figures 10 and 21 (Appendix 14.3) depict similar levels of visibility in the views south, back along Sráid nam Marbh, and south from St Columba's shrine chapel respectively. As well as demonstrating the impact from these specific key viewpoints, the end of the medieval pilgrimage route and the most holy part of the monastery, they also help illustrate the likely levels of visibility when moving through the monastic complex, appearing in views from the front of the abbey, the high crosses in front of it, boundaries, chapels and routeways, with more turbines, and the substation platform, steadily coming into view as the viewer moves east. The turbines would be a constant presence out across the Sound of Iona, filling the currently empty horizon to the south.

As shown in Figure 11 (Appendix 14.3) the turbines would remain highly visible in views from the road north of the monastery, where they would be framed and accentuated by the abbey and the surrounding topography. They would be visible in views down the sound and out across the sea, towards Ireland, at this point where the entirety of the complex and its constituent parts are perhaps best appreciated. Figure 11a (Appendix 14.3) demonstrates similar impacts from the northern part of the monastery but closer to the shore, which is a good location to appreciate the complex and its relationship with the sea, in particular.

Similar levels of visibility also appear in the important views of the sea and the monastery from Cladh an Diseart, as shown in Figure 23 (Appendix 14.3). The turbines would appear to fill the open horizon to the south. This would undermine the sense of separation and perceived remoteness of the monastery; the sense of the monastery being bounded by the sea; and the evocative absence of Ireland articulated by the empty horizon.

Figure 16 (Appendix 16-4) demonstrates that, from the summit of Dùn Ì, the proposals would be visible in their entirety, dominating the view southwards across Iona on a horizon otherwise empty of any development. Similar impacts would be felt at St Columba's Bay.

By introducing large scale modern development across seaward views, the proposals would significantly detract from the open, maritime character of the island's surroundings and fundamentally alter the monastery's sense of remoteness. Across the monastery, the views southwards over the sea and towards Ireland, its absence laden with meaning, would be

interrupted and compromised, with the proposals filling an expansive area on the southern horizon.

The ability to understand, appreciate, and experience the choice by Columba and his monks to settle on a place at the edge of the ocean, and the edge of their known world would not be retained, nor Columba's deliberate sense of separation from Ireland. The sense of being bounded by the sea was a deliberate choice by St Columba and his followers and is a key part in contributing to the monastery's sense of remoteness and separation from the world.

The proposals would have a significant adverse impact on those factors of setting that contribute to the monument's cultural significance. The relationship between the monastery and its associated sites to the north and south would be undermined. The visual relationship between elements of the monastery would be compromised. The relationship between the monastery and the absent Ireland to the south would be disrupted. The sense of separation and remoteness, defined by the surrounding sea, would be undermined.

Consequently, the monument would not retain an appropriate setting, and the proposals would therefore be inconsistent with the objectives of Policy GEN 6 of Scotland's National Marine Plan (NMP).

These effects would also result in a significant adverse impact on the integrity of the setting of the scheduled monument, as changes to factors of setting that contribute to its cultural significance would mean that the understanding, appreciation and experience of the asset would not be adequately retained. The proposals would therefore fail to avoid significant adverse impacts on the integrity of the asset's setting, contrary to the requirements of Policy 7(h) of NPF4.

*Impacts on the Setting of Iona Abbey (LB12310)*

The proposed development would also have a significant adverse impact on key aspects of the abbey's setting, and therefore its architectural and historic interest. Whilst not appearing directly in views of the abbey buildings over the crossing or progressing up the route from Baile Mòr, turbines would be a near constant presence in the wider views, taking in the surroundings throughout the journey and when stopping at key points along it, affecting the wider setting through which the abbey is approached. For instance, they would appear over the sea and on the skyline across the open land to the south of the nunnery and from McLean's Cross.

Visible turbines would also affect important views between the abbey and the wider monastic complex. Cultural Heritage Figure 9 (Appendix 14.3) demonstrates that the turbines would appear within views from Tòrr an Aba towards Sráid nam Marbh, Reilig Odhráin, St Oran's Chapel, St Columba's Shrine Chapel and the high crosses. These relationships were later deliberately incorporated into the layout, frontage, and placing of the entrance into the abbey. After the monastery was passed to the reformed Benedictine community, the abbey and the area around its entrance became the visual and spiritual focus of the wider monastic complex, drawing significance from the earlier church and its connection to St Columba. Many of the main features that formed the core of the earlier monastery were directly subsumed into the core of the new complex and were referenced

by the abbey buildings. The presence of turbines within these views would therefore detract from the appreciation and understanding of the relationship between the abbey and the earlier monastic landscape.

Figures 10 and 21 (Appendix 14.3) demonstrate that turbines would be visible in views south from St Columba's Shrine Chapel and back along Sráid nam Marbh. They would also appear in views south from the front of the abbey, the high crosses in front of it, occupying the open southern horizon across the Sound of Iona.

The presence of turbines would adversely affect the abbey's visual prominence within its wider surroundings, including its relationship with the monastery, reciprocal views along the historic pilgrimage route culminating at the abbey, and the open maritime setting and coastal island context, all of which contribute to the understanding, appreciation and experience of the asset. Inward-facing views of the abbey complex, including those experienced between and behind the buildings, within the cloister, and from within the church interior, would remain largely unaffected. Static views towards the front of the abbey from the east would likewise not be disrupted.

The proposed development would therefore have a significant adverse impact on key factors of setting that contribute to the asset's architectural and historic interest and, consequently, its cultural significance.

As such, the proposal would be inconsistent with Policy GEN 6 of Scotland's National Marine Plan, which requires the settings of designated heritage assets to be appropriately protected.

It would also fail to meet the requirements of Policy 7(c) of NPF4, which states that development proposals affecting the setting of a listed building should preserve its character and special architectural or historic interest.

*Shared Impacts on the Settings of SM12968 and LB12310*

The proposed development would introduce a large-scale development across the currently undeveloped horizon in views experienced during the crossing to and from Iona, along the approach to the monastery and abbey, and in key views within, across and of the wider monastic complex, including reciprocal views between the abbey and the surrounding monastic landscape, where the abbey forms the visual focus. It would also be visible in views towards and out from the core of the religious complex, including its relationship with the pilgrimage route and the crossing to and from Mull. In addition, turbines would be seen in views south across the Sound of Iona, affecting appreciation of the site's coastal and island setting and its relationship with the surrounding seascape, including outward views towards Ireland and western Scotland.

The proposals would become an almost constant presence within the setting of both assets. The turbines would also be substantially out of scale against the scattered domestic-scale settlement in and the open rural character of Iona.

The deliberate sense of separation, seclusion, and remoteness sought by Columba in founding his monastery on Iona would be substantially undermined. Iona's ability to evoke

Columba's world; its spiritual connection to the Christianising of Scotland; Iona's place within Scottish and Irish Gaelic culture; and its place in the emergence of the Scottish Gaelic world – all of which are core to the national importance and cultural significance of the monastery and abbey – would be significantly detrimentally affected by the proposals.

The proposals would also adversely affect the ability to appreciate the development of the monastic complex through time. In important views from the north of the monument, where the relationship between the early medieval vallum, the wider monastic complex and the later abbey can be readily understood, the turbines would become a prominent new and detracting feature.

Taken together, these effects would have a significant adverse impact on the settings of both St Mary's Abbey, Iona Monastic Settlement (SM12968), and Iona Abbey (LB12310), and on the individual and shared cultural significance that they derive from their setting, including as part of a wider historic landscape. The proposals would fail to appropriately protect the settings of these designated heritage assets. Consequently, they would be inconsistent with Policy GEN 6 of Scotland's National Marine Plan.

In relation to the scheduled monument, the proposals would result in significant adverse impacts on the integrity of its setting, with changes to factors of setting that contribute to its cultural significance such that the understanding, appreciation and experience of the asset would not be adequately retained. As such, the proposals would be contrary to Policy 7(h)(ii) of NPF4. In relation to the category A-listed building, the proposals would fail to meet the requirements of Policy 7(c) of NPF4, which states that development proposals affecting the setting of a listed building should preserve its character and special architectural or historic interest.

We therefore **object** to the proposed development as applied for under the Section 36 application and associated marine licence applications.

Consequently, we do not consider that the applications demonstrate compliance with HEP1, as the assessment of the impacts of the proposed development on the setting of both assets does not adequately take account of their breadth and cultural significance. We also do not consider that the proposed development complies with HEP2 or HEP4, as the significant setting impacts identified above would detract from the understanding and enjoyment of these assets and would therefore fail to ensure that these qualities are secured for present and future generations. The proposed development would introduce changes to the assets' context that would not be managed in a way that protects the historic environment.

### Oronsay Priory and Cross (SM287)

The monument is the ruins of an Augustinian priory founded either by Aonghus Óg Mac Domhnaill, Lord of Islay, or his son John I, Lord of the Isles, sometime between 1325 and 1353. It comprises a sequence of buildings constructed over the centuries that followed, including a church, cloister, conventual buildings, prior's house, and burial aisles extending into the 1500s, with some further burial enclosures added as late as the 19th century. The priory appears to have steadily fallen into disrepair after the Reformation, with sporadic references suggesting some ongoing religious activity until at least 1624. It was ruinous by

1695. The Lords of the Isles may have founded the priory here due to an association of St Columba with Colonsay and Oronsay. A tradition that was not recorded until the 1700s suggests that this was believed to be where Columba first landed in Scotland, before travelling on to Iona (other places claim this accolade, but the island's location means this is tenable). The priory was also dedicated to St Columba, while the placename Oronsay is also associated with Oran, one of Columba's relatives and acolytes. This may, however, be a later misinterpretation of its original meaning. It is possible that there was an early medieval monastic community here; however, there is no obvious surviving evidence for this.

## Setting

The priory overlooks much of the flatter, more fertile stretches of the southern half of Oronsay, with clear views south across much of Scotland's western seaboard. To the south and west, this land gives way to the wide, open expanse of the Atlantic Ocean. These views are important for understanding Columba's connection with both Ireland and Scotland, as well as the strong maritime foundations of the Lordship of the Isles. Important views include those from the sea towards the priory and the land around it, particularly around Port na Luinge and Port na Ròn, sheltered bays that were no doubt used to access the priory from the sea; and views towards the priory from the east, after crossing The Strand from Colonsay. The Strand is both a historic and current crossing between Colonsay and Oronsay, as is the road to the Priory, which also historically served as a coffin road.

As the only large building complex in its surroundings, the priory would have stood out as a solitary, visible statement, emphasising its religious purpose and reflecting the status of its patrons, the Lords of the Isles. Later farm buildings have been constructed immediately beside the priory and between it and the sea. These largely obscure the sea from view from close to and within the priory and reduce its visibility on approaches towards it from the sea. On approaches from the east, the priory is partly obscured by a row of cottages until the entrance gate is reached. However, the overall cluster of buildings is relatively modest in scale, and the tops of the priory's gables remain clear on the skyline in most inward views.

Dùn Domhnuill, a fort on Beinn Oronsay, may have been reused by the Lord of the Isles during the period when the priory was in use, with the relationship between the two sites therefore likely to have been of some significance.

Key factors of the monument's setting are therefore:

- Landward views towards it from the west
- Views towards it from the east
- Views out from it across Oronsay and Scotland's western seaboard.
- Views across the monument from Dùn Dòmhnuill

## The EIA Assessment

The monument's setting is poorly defined in the applicant's assessment given in paragraphs 62–66 of Appendix 14.3. The applicant accurately identifies that the monument progressively comes into view as it is approached from the east and that views out from it across the south-west, including towards Ireland, are important. However, there is no analysis of the historical context of the priory as a key religious site within the Lordship of

the Isles, or how this can be understood, appreciated, and experienced in its setting. This limited definition of the monument's setting means that the applicant's assessment of impact is correspondingly limited.

The applicant suggests that the existing farm buildings, west of the priory, surround it, and that they would obscure the visibility of the turbines. They state that the white render of Oronsay House draws the eye away from the priory buildings, which blend into the surrounding rocky landscape. They also state that the views from Beinn Oronsay do not reflect any functional or associative connection with the priory. We disagree with this assessment.

### Our Assessment

The applicant's visualisations from the location of the MacDuffie Cross (Figure 19) and the access track (Figure 18) demonstrate that the proposals would appear prominently behind the monument in views towards it from the east, particularly from the important historic and modern approaches towards the priory. The turbines would appear prominent in views above the priory buildings when viewed from a distance, although those behind the priory would become increasingly obscured by the buildings closer to the monument.

The southern extent of the wind farm would, however, be consistently visible to the left of the priory on approaches to it from the east.

The result is that, whilst the wind farm would distract from and undermine the priory's presence in more distant views from the main landward approach, the effect on the monument's more immediate setting, where the complex of priory buildings can be fully understood, appreciated, and experienced, would be minimal.

Figure 4 depicts the view across the monument from an elevated position on Beinn Oronsay, approximately 300 m west of Dùn Dòmhnuill. Given the distance and changes in elevation, it does not depict the impact on the important views of the priory from the fort, but it is a helpful indication. This visualisation suggests that most of the windfarm would appear on the horizon behind the priory in the views from Dùn Dòmhnuill. While the proposals would distract from these views, the ability to understand, appreciate, and experience this relationship would remain broadly appreciable. Landward approaches from the sea would be unaffected.

Overall, the wind farm would be a constant presence in important key views associated with the priory, appearing either to one side of the priory or above the silhouette of the priory gables in views from further away, including from along the main approach. However, the priory and surrounding cluster of buildings, standing alone on the island plain, would remain the main focus of these views. Furthermore, the intimacy of the monument and its setting would be retained once close to and within the priory. On balance, whilst there would be significant impacts on some aspects of the priory's setting, the overall setting would be adequately protected.

## Beinn a' Chaisteil, promontory fort and associated remains, Islay (SM13213)

The monument is the remains of a substantial promontory fort, occupying a distinctive coastal headland, and series of structures in the adjacent cleft below, situated on the north-

west coast of Islay. The visible remains reflect at least two, and probably more, phases of use, the earliest of which is likely to be later prehistoric in origin (between 500 BC and AD 500).

The headland is surrounded by steep sea cliffs on all but the landward side, where the slopes descend to lower ground inland. The denuded remains of a single stone wall run along the landward side, enclosing the headland.

To the west of the headland, enclosed by cliffs on both sides, the land drops down to the sea, first through a cleft in the cliffs and then via a rocky valley. Near the top of the valley, but low enough to be hidden from inland views, a substantial drystone wall cuts across the lower slopes. It incorporates several features, including an impressive lintelled entrance passage. Another group of structures lies further downslope. These include a relatively well-preserved drystone corbelled building that appears to be of some age, together with a much more recent stone built hut. The massive form of the enclosure wall and the older corbelled structure are highly unusual, with few to no direct parallels.

As a result of this, and because of its evocative setting, the monument is highly enigmatic. Its date, use and function remain unclear, with interpretations comparing it to Iron Age monumental architecture, early medieval monastic hermit cells similar to those found along the western seaboard of Scotland and Ireland, and medieval or later seasonal houses more generally associated with the Outer Hebrides. While aspects of the site support each of these interpretations, none wholly explain all its features. Although the monument may represent multiple phases of occupation and use, it remains difficult to interpret with confidence.

## Setting

The fort's construction on a prominent rocky headland provided an easily defended and/or enclosed position. Its positioning would have afforded commanding views across much of the western part of Islay, across an expansive moorland plain. Dun Bheolain is visible to the south, and both sites may have been in contemporary use. The relatively flat, lower-lying land stretching eastwards from the monument contains a number of broadly contemporary settlement and farming sites, indicative of communities living and working across this area during prehistory. The fort overlooks much of this land and consequently reciprocal views between the fort and these lower-lying areas, including the two nearby sheltered bays, are a key factor of its setting.

The settlement in the gully is hidden from inland views. Cliffs enclose it on both sides and the land drops to the sea through a series of cliffs and gullies. Together, the enclosing cliffs and the fall in ground towards the coast frame views of the sea beyond, particularly on entering the gully through the cleft in the cliffs above. The seclusion from inland, surrounding cliffs, rugged topography and drop to the coast make the sea an intimate yet dramatic part of its setting, reinforcing its sense of isolation. This setting is key to its interpretation and informs the various interpretations listed above.

## The EIA Assessment

The applicant has identified various significant aspects of the monument’s setting, including wide-ranging views out to sea, its inaccessibility, and its intervisibility with Dun Bheolain.

However, they suggest that the monument's setting is limited largely to a "*generalised perception that this is a remote place that accords with modern perceptions of remoteness*," and that "*little more can be determined than the fact that location of a promontory fort suggests past occupation and use*" (para. 84, Appendix 14.3). We disagree with this. The setting of the fort clearly demonstrates its strategic importance overlooking various parts of western Islay and its coast. The secluded, isolated nature of the remains situated within the gully can also be readily understood, appreciated, and experienced, despite the lack of certainty about the site's interpretation.

The applicant suggests that the importance of the sea to the monastic way of life is unclear and that any relationship with the sea can only be considered a general association, and peripheral to how the monument is understood, appreciated, and experienced. We also disagree with this. Evidence to support the importance of isolation and connections with the sea to monastic ways of life is detailed in our comments on Iona.

The applicant concludes that the proposals would not affect any understanding of the asset 'or its place in the landscape'.

The applicant identifies little difference in the impacts between the two turbine layouts, suggesting that the scale and prominence of the larger turbines in the 91-turbine layout would be offset by the effects of the denser arrangement of smaller turbines in the 144-turbine layout. Consequently, the applicant concludes that there would be no material difference in impact between the two layouts. We disagree with this. The comparative wirelines in Figure 5f (Appendix 14.3) suggest that the perceived difference in height between the turbines would be negligible at these distances, and consequently the denser layout of the 144-turbine scheme would have a greater impact.

### Our Assessment

The proposals would be visible in their entirety from the fort on the summit of Beinn a'Chaisteil and would also be likely to be visible behind it in views from parts of lower inland ground. This would detract from the fort's perceived elevation and from what that elevated position may have signified about those occupying it. However, the turbines would not be overly prominent, and the majority of the panoramic view out from the fort would be unaffected. Any impacts on the fort's setting would therefore be unlikely to be significant.

Visualisations have been provided to show the proposals in seaward views from various points within the gully. Those from the lower-lying structures situated within the gully indicate that almost the entire seaward horizon would be filled with turbines. The visualisation from near the top of the cleft shows that turbines would be framed by the cliffs on either side.

While the presence of the turbines on the seaward horizon from lower down in the gully would affect the sense of seclusion that is such an important part of this monument's setting, there would be little to focus attention directly towards them, which would soften the level of impact overall.

The viewpoint above the gully on its landward side indicates that at this pinch point, where the sense of seclusion from the land is perhaps the most apparent, the turbines would be

framed by the cliffs, focusing attention directly on them. This would begin to undermine the ability to experience, appreciate and understand this element of the monument's setting, but the impacts would not be significant enough to warrant objection.

While the presence of turbines on the seaward horizon when viewed from lower down in the gully would affect the sense of seclusion that is such an important part of the monument's setting, they would be located at some distance and there would be little to focus attention directly on them. This would moderate the overall level of impact.

While the presence of the turbines on the seaward horizon would affect this sense of seclusion, it would still be readily understood, appreciated, and experienced through the high enclosing headlands flanking the site. This aspect would also be readily understood when looking towards the monument from the sea. The monument would therefore retain an appropriate setting for both its Iron Age features and the later remains in the gully below.

### Dun Bheolain, fort, Islay (SM13214)

The monument is the remains of a substantial promontory fort occupying a distinctive coastal headland on the north-west coast of Islay. The visible remains reflect two or more phases of use, the earliest of which is likely to be Iron Age in origin (800 BC – AD 500). The headland is surrounded by steep sea cliffs on all but the south-east (landward) side, which rises towards the end of the headland in two distinct terraces. Two walls run across the two narrowest parts of the headland. The fort's interior comprises three distinct areas between summits and terraces. Several hollows and platforms are likely to represent the remains of dwellings or structures. Dun Bheolain is the largest promontory fort on Islay.

### Setting

Like many of its type in Argyll, the fort occupies a distinctive coastal promontory with a seaward outlook to the west and excellent views southwards over the south-west coast of Islay. It lies very close to a neighbouring site, Dun nan Nighean, which occupies a smaller promontory immediately to the north. The monument has been constructed to demonstrate the power and influence of its inhabitants, while allowing them to exert a degree of control over its surroundings. Its construction on a dramatic and distinctive rocky headland provides an easily defended position, which establishes the fort as an obvious focal point. On approaches from the south, the headland's distinctive profile is visible for several kilometres. The fort's positioning would have allowed its inhabitants commanding views across much of the western part of Islay, which includes areas of good farmland, and the seaways along the coastline. Reciprocal views between the fort and these lower-lying areas and the seaways along the coastline are therefore a key factor of its setting.

### The EIA Assessment

The applicant notes the headland's distinctive profile and accurately lays out the setting of the monument. Regarding the likely setting impacts, the applicant suggests that the views north from the monument, across Dun nan Nighean and Tràigh Bhàn towards Beinn a' Chaisteil, would be unaffected, with views towards the monument also unaffected. This is not supported by the supplied visualisations, which demonstrate that both of these key factors of setting would be affected (Figures 7 and 16, Appendix 14.3). The applicant also states that the proposals would not detract from the monument's prominence within its surroundings. Despite concluding that key factors of setting would be unaffected, the

applicant concludes that the proposals would result in a major adverse significance of effect on the monument.

Regarding the possible difference in impacts between the two turbine layouts, the applicant takes a similar view to that given for Beinn a' Chaisteil, suggesting that the scale and prominence of the larger turbines in the 91-turbine layout would be balanced by the impacts of a denser layout of smaller turbines in the 144-turbine layout and that, consequently, there would be no difference in impact depending on layout. While the comparative wirelines for views out from the monument (Figure 7f, Appendix 14.3) suggest a broadly similar impact from both layouts, this is not the case in views towards the monument from the south. Here, the applicant suggests that the lower-lying land to the west of the monument would be insufficient to screen the smaller turbines of the 144-turbine layout from view, resulting in a similar impact to the 91-turbine scheme. However, Figure 16a (Appendix 14.3) demonstrates that more turbines would be seen immediately to the west of the monument in the 91-turbine layout.

### Our Assessment

The full extent of the wind farm would be visible in views out from the monument. In views north across Dun nan Nighean and Tràigh Bhàn towards Beinn a' Chaisteil, the turbines would be highly visible; however, the proposals would not be directly behind these features and would, in terms of scale, appear recessive next to the dramatic landforms of Islay's west coast. The impact of the proposals on this key factor of setting would therefore be fairly limited. Views inland from the monument would be unaffected.

Figure 16 shows the turbines occupying the western horizon immediately adjacent to Dun Bheolain in views from the coastal plain to the south, detracting to some extent from the headland's distinctive, prominent profile. Overall, however, the proposals would not compete with the headland's considerable scale relative to its surroundings and, consequently, the monument's dominance over these surroundings. The 91-turbine layout would have a greater effect in this regard, but this still would not undermine this key factor of setting such that it cannot be adequately understood, appreciated and experienced.

Whilst the wind farm would be visible out to sea, the relationship with views of, and whilst travelling along, passageways along Islay's coastline would be largely unaffected.

### Dubh Artach Lighthouse (LB12320)

The category A-listed lighthouse dates from the 1860s-70s and was built on a skerry in the Atlantic Ocean. Designed by David and Thomas Stevenson, it was constructed in response to continued shipwrecks in the area. Its special architectural and historic interest derives primarily from its industrial character, engineering ingenuity, visual prominence, and remote setting.

We previously advised that the proposed development could adversely affect the lighthouse's setting, and therefore its cultural significance, by reducing its prominence, particularly where views are interrupted by turbines during the day and where turbine lighting dilutes the effectiveness of the lighthouse light at night.

Based on their assessment, the applicant has concluded that the proposed development would be 'significant' in EIA terms; "*As such, this change to the setting will result in a medium adverse magnitude of change. For an asset of high sensitivity, this would give rise to a major adverse effect, which is significant in EIA terms*" (page 146 of Appendix 14.3). The justification for this is outlined in the preceding paragraphs beginning at 1.6.2.3.

The assessment of impacts on Dubh Artach Lighthouse does not explicitly refer to the three factors of setting or clearly explain how the proposed development would affect understanding, appreciation and experience of the asset. It also does not address how turbine lighting would affect its setting. Whilst we acknowledge that "night-time effects" on the lighthouse are briefly discussed on page 108 of the Seascape, Landscape and Visual Impact Assessment (Chapter 16), assessment of setting is distinct from the SLVIA, and predicted SLVIA effects cannot be assumed to result in corresponding setting impacts.

We also note that the assessment does not refer to the relationship between the lighthouse and the small tidal island of Erraid located off the southwest coast of Mull. This island acted as the shore station for both Dubh Artach and Skerryvore (LB17849). It contains a Category C-listed observatory (LB12309) which would have provided visual communication to the respective lighthouses.

We consider the visual and functional relationship between Dhu Artach and Erraid forms part of the setting of the lighthouse. Whilst this factor of setting does not form part of the assessment by the applicant, we do not consider it would alter the conclusion provided.

Despite the points above, the EIA Report contains sufficient written and visual information for us to conclude that, while the proposed development would result in a notable change to the setting of the lighthouse, it would not significantly affect our understanding, appreciation, or experience of the lighthouse and its cultural significance to a degree that would be contrary to Policy GEN 6 of the National Marine Plan, or Policy 7(c) of NPF4.

Historic Environment Scotland
11 September 2026

# Maritime & Coastguard Agency

[Redacted]
**Maritime and Coastguard Agency**
UK Technical Services Navigation
105 Commercial Road
Southampton
SO15 1EG

www.gov.uk/mca
14th August 2026

Licensing Operations Team,
Marine Directorate,
Scottish Government,
Marine Laboratory,
Aberdeen.
AB11 9DB.

By email to MD.MarineRenewables@gov.scot

Dear Marine Directorate,

**APPLICATION FOR CONSENT UNDER SECTION 36 OF THE ELECTRICITY ACT 1989 AND MARINE LICENCES UNDER PART 4 OF THE MARINE (SCOTLAND) ACT 2010 AND PART 4 OF THE MARINE AND COASTAL ACCESS ACT 2009 FROM MACHAIRWIND LIMITED TO CONSTRUCT AND OPERATE THE MACHAIRWIND OFFSHORE WIND FARM.**

Thank you for the opportunity to comment on the applications for consent under Section 36 of the Electricity Act 1989 and marine licences under the Marine (Scotland) Act 2010 for the MachairWind Offshore Wind Farm.

The Maritime and Coastguard Agency (MCA) is an Executive Agency of the Department for Transport and is responsible throughout the UK for implementing and developing the UK Government's maritime safety and environmental protection policy. This includes co-ordinating maritime Search and Rescue (SAR) through His Majesty's Coastguard 24 hours a day and checking that ships meet UK and international safety rules. The MCA works to prevent the loss of lives at the coast and at sea, to ensure that vessels are safe, and to prevent coastal pollution. The UK Technical Services Navigation Branch is responsible for UK radiocommunication and navigation policy. This primarily covers SOLAS Convention (Safety of Life at Sea Convention 1974, as amended) Chapters IV and V; the COLREG Convention (International Regulations for Preventing Collisions at Sea 1972, as amended); and the ITU Convention (International Telecommunications Convention 1932, as amended).

The Navigation Risk Assessment (NRA) and the shipping and navigation elements of the Environmental Impact Assessment Report have been reviewed, and we would like to comment as follows:

**Navigation Risk Assessment (NRA)**
Anatec Limited has undertaken a detailed NRA in accordance with MCA guidance (MGN 654) and NRA risk assessment methodology. This NRA, which is presented in Volume 3c, Appendix 13.1, informs the Shipping and Navigation chapter of the EIA presented in Volume 2, Chapter 13.

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We are satisfied that appropriate traffic data has been collected in accordance with MGN 654, which includes two 14-day marine vessel traffic surveys. We note from Table 5-1 that full surveys were carried out in winter 2023 (1st December – 16th December) and summer 2024 (16th August – 31st August). It is further noted however, that the full traffic survey for winter falls outside of the 2-year period of validity. In discussion with the Project and as captured in section 4 of the NRA, it was agreed that a further winter survey of 6 days in January 2025 combined with additional AIS data from 2024-2025 along with the original 14-day compliant survey, would be sufficient to represent traffic movements for detailed analysis. MCA continue to assess each project on a case-by-case basis and on this occasion, we are content with the additional data provided. This does not set precedent for future projects.

We welcome the work the project has done with stakeholders in regard to concerns raised over the Dubh Artach Lighthouse. The production of the Technical Note in Appendix 15.2 and the changes to the Red Line Boundary with continued engagement with Northern lighthouse Board (NLB), are welcomed and we are now content that sufficient modifications have been made to bring navigation risk to As Low as Reasonably Practicable (ALARP) for the new considered boundary.

The MCA is content that the hazard log presented in Appendix B, Table B.1 of the NRA is a reasonable and proportional assessment of the risks. A completed MGN 654 Checklist has also been provided in Annex A, Table A.1 as part of the NRA, and we are satisfied that all recommendations have been addressed.

It is noted that some of the older studies carried out by the MCA regarding Navigation, Communication, and Position Fixing Equipment are referred to in Section 13 of the NRA. These are supported by other more recent studies which is welcomed. There may be additional benefit in referring to more recent helicopter trials and documents written by the MCA in 2019, titled: “MCA report following aviation trials and exercises in relation to offshore windfarms” and “MCA report following aviation trials at Hornsea Project 1 windfarm”. However, we are content with the conclusions of the impact on navigation, communication and position fixing equipment presented by the applicant.

**Emergency Response and Search and Rescue**
A SAR checklist based on the requirements in MGN 654 Annex 5 will need to be completed in agreement with MCA before construction starts. This will include the requirement for an approved Emergency Response Co-operation Plan (ERCoP) and will be incorporated as a condition of the Marine Licence.

During SAR discussions, particular consideration will need to be given to the implications of the site size and location. As there are various possible scenarios regarding the final layout of the array at MachairWind as stated in paragraph 67 of the NRA and as discussed in Chapter 3: Project Description, it would be beneficial for the applicant to confirm the final build out scenario as early in these SAR discussions as possible.

Attention should be paid to the level of radar surveillance, AIS and shore-based VHF radio coverage and give due consideration for appropriate mitigation such as radar, AIS receivers and in-field, Marine Band VHF radio communications aerial(s) (VHF voice with Digital Selective Calling (DSC)) that can cover the entire wind farm sites and their surrounding areas.

**Cumulative Impacts**
A Cumulative Effects Assessment (CEA) has been made based on existing and proposed developments in the study area as explained in Chapter 5: EIA Methodology and Sections 3 and 15 of the NRA. We welcome Anatec’s note in section 3.3 of the NRA highlighting that the tiering system

applied in the NRA does differ from the chapter 5 methodology. We are content however that the tiering applied in the NRA is specific and relevant for shipping and navigation and have no objections regarding its inclusion.

The main commercial routes and those with potential for deviations have also been identified. 12 routes are highlighted and presented in Table 11-1 of the NRA. Expected deviations are also represented, with 3 routes being identified and presented in figure 14.1. We are content with this approach to the CEA at this stage.

**Layout Design**
The turbine layout design will require MCA and Northern Lighthouse Board (NLB) approval prior to construction to minimise the risks to surface vessels, including rescue boats, and search and rescue aircraft operating within the site. Ongoing engagement with NLB regarding the safe access to Dubh Artach lighthouse is encouraged going forward.

The MCA will seek to ensure all structures are aligned in straight rows and columns with a minimum of two lines of orientation. Further advice will be provided to the project once the layout discussions have started.

**Marking, Lighting and Construction Programme**
The MCA will seek to ensure the turbine numbering system follows a 'spreadsheet' principle and is consistent with other windfarms in the UK. All lighting and marking arrangements will need to be agreed with the MCA and the NLB. The MCA requires all aviation lighting to be visible 360° and compatible with night vision imaging systems, as detailed in CAP 764 and MGN 654 Annex 5. We would also expect to see some form of linear progression of the construction programme avoiding disparate construction sites across the development area, and the consent needs to include the requirement for an agreed construction plan to be in place ahead of any works commencing.

**Wet Storage**
It is noted from the non-technical summary and project description that MachairWind will be utilising fixed bottom structures in the final design of the wind farm. Therefore, storage of floating structures is not expected. However, as a reminder to the developer regarding any storing of components on the seabed within the array area or export cable corridor the MCA will need to be informed of materials to be stored and made aware of any that will exceed a 5% reduction in surrounding depth referenced to Chart Datum.

**Hydrographic Surveys**
MGN 654 requires that hydrographic surveys should fulfil the requirements of the International Hydrographic Organisation (IHO) Order 1a standard, with the final data supplied as a digital full density data set, and survey report to the MCA Hydrography Manager. Further information can be found in MGN 654 Annex 4 supporting document titled 'Hydrographic Guidelines for Offshore Developers', available on our website: https://www.gov.uk/guidance/offshore-renewable-energy-installations-impact-on-shipping. This includes surveys during the pre-construction, post-construction and post-decommissioning stages. We would like to highlight the need to provide the data in either GSF or CARIS format and that Total Vertical and Horizontal Uncertainty (TVU & THU) calculations must be provided.

**Cable Routes**
We note from Chapter 1: Introduction, that there was a delay in confirming grid connection. Therefore, separate consent will be sought for the Export Cable Corridor (ECC). However as stated in Chapter 13: Shipping and Navigation, the Wind Farm Development Area (WDA) will be considered which

includes the following infrastructure: '*Wind Turbine Generators (WTG), Offshore Substation Platforms (OSP) and associated fixed foundations and scour protection, inter-array cables (IACs), OSP link cables, the portion of the offshore export cable located within the WDA and associated cable protection'*.

For the WDA it is noted in Appendix 5: Mitigation and Commitments Register (as Mitigation M-8) that a Cable Burial Risk Assessment (CBRA) is to be carried out and a cable plan (CaP) produced. Any consented cable protection works must ensure existing and future safe navigation is not compromised. The MCA would accept a maximum of 5% reduction in surrounding depth referenced to Chart Datum. We welcome acknowledgment of this in Paragraph 300 of the NRA.

We note from Chapter 3 Project Description that High Voltage Alternating Current (HVAC) transmission infrastructure will be used for the Inter-array Cables (IACs). Therefore, a pre-construction compass deviation study will not be required.

We further note from Chapter 3, that High Voltage Direct Current (HVDC) Infrastructure may be used for export cables. We would like to remind the applicant that in the case of HVDC installation, consideration must be given to the effect of electromagnetic deviation on ships' compasses. The MCA would be willing to accept a three-degree deviation for 95% of the cable route. For the remaining 5% of the cable route no more than five degrees will be attained. If an HVDC cable is being used, we would expect the applicant to do a desk based compass deviation study based on the specifications of the cable lay proposed and assess the effect of EMF on ship's compasses. MCA may request for a deviation survey post the cable being laid; this will confirm conformity with the consent condition. The developer should then provide this data to UKHO via a hydrographic note (H102), as they may want a precautionary notation on the appropriate Admiralty Charts (actions at a later stage depending upon the desk-based study and post installation deviation survey).

**Safety Zones**
The requirement and use of safety zones have been detailed in the application. Specifically in section 3.6.13 of the Project Description. They are also listed as mitigation measure M-23 in table 1.1 of Appendix 5, in Table 13.8 Chapter 13 and in Table 17.1 (embedded mitigations) of the NRA. MCA supports the use of safety zones and will comment on the safety zone application once submitted, as a statutory consultee.

**Liaison with local MCA Marine Office**
The applicant should be reminded that their contractors and subcontractors must have the required certification for all vessel operations, and early engagement with the local MCA Marine Office should be undertaken where necessary to ensure there are no issues with regards to survey and inspections, towage, and safety requirements. Various additional certificates including a load line exemption for any floating turbine platforms will be required prior to any towage to site and the applicant must ensure any ballast water requirements are addressed.

**Embedded Mitigation**
We have the following comments on the proposed risk controls in section 17, Table 17.1 of the NRA:

1. Cable Burial Risk Assessment;
    - In case of damage to, or destruction or decay of, the authorised project seaward of MHWS or any part thereof, excluding the exposure of cables, notification must be issued to MCA, NLB, the Kingfisher Information Service of Seafish and the UKHO within 24 hours of becoming aware.

- In case of exposure of cables on or above the seabed, the undertaker must within three days following identification of a potential cable exposure, notify mariners and inform Kingfisher Information Service of the location and extent of exposure. Copies of all notices must be provided to the MCA, NLB, and the UKHO within 5 days.
- The plan must include proposals for monitoring offshore cables including cable protection during the operational lifetime of the authorised scheme which includes a risk-based approach to the management of unburied or shallow buried cables.
- Attention should be paid to cabling routes and where appropriate burial depth for which a Burial Protection Index study should be completed and subject to the traffic volumes, an anchor penetration study may be necessary.

2. Navigational Safety Plan (NSP) and Vessel Management Plan (VMP);
    - Local notification to mariners must be issued at least 14 days prior to the commencement of the authorised project or any part thereof advising of the start date of each work and the expected vessel routes from the construction ports to the relevant location. They must be updated and reissued at weekly intervals during construction activities and at least 5 days before any planned operations (or otherwise agreed) and maintenance works and supplemented with VHF radio broadcasts agreed with the MCA.
    - The Kingfisher Information Service of Seafish, must be informed of details of the vessel routes, timings and locations relating to the construction of the authorised project or any part thereof by email to kingfisher@seafish.co.uk :-
        i. at least 14 days prior to the commencement of offshore activities, for inclusion in the Kingfisher Fortnightly Bulletin and offshore hazard awareness data, and;
        ii. as soon as reasonably practicable and no later than 24 hours of completion of all offshore activities.
    - Post construction monitoring is required and must include vessel traffic monitoring by automatic identification system for a duration of three consecutive years following the completion of construction of the authorised project. An appropriate report must be submitted to the MCA and NLB at the end of each year of the three-year period.

**Conclusion**

The comments detailed above are not considered to be blocks to development, but they are provided to highlight any areas which may require further discussion. Subject to the applicant meeting requirements addressed in this letter and meeting the licence conditions, it provides a cautious acceptance of the application for consent.

Yours faithfully,

**[Redacted]**

**[Redacted]**

Offshore Renewables Project Lead

**Marine Safety and PNT Services**

NatureScot

NatureScot
Scotland's Nature Agency
Buidheann Nàdair na h-Alba

Marine Directorate
Scottish Government
Marine Laboratory
Aberdeen
AB11 9DB

04 September 2026

Our ref: CNS REN OSWF W1 - MachairWind

Sent by email to MD.MarineRenewables@gov.scot

Dear Marine Directorate,

**MACHAIRWIND OFFSHORE WINDFARM**

**APPLICATION FOR CONSENT UNDER SECTION 36 OF THE ELECTRICITY ACT 1989 AND MARINE LICENCES UNDER THE MARINE (SCOTLAND) ACT AND PART 4 OF THE MARINE AND COASTAL ACCESS ACT 2009 TO CONSTRUCT AND OPERATE THE MACHAIRWIND OFFSHORE WINDFARM**

Thank you for consulting us on the Section 36 and Marine Licence Applications submitted by MachairWind Limited for the proposed MachairWind Offshore Windfarm, which is accompanied by an Environmental Impact Assessment (EIA) Report, Report to Inform Appropriate Assessment (RIAA), Report to Inform Marine Protected Areas Assessment and Derogation Case (without prejudice).

**Summary of NatureScot advice**

***Seascape Landscape and Visual Impact Assessment (SLVIA)***

The Proposed Development would result in **significant adverse effects on:**

- **Jura National Scenic Area (NSA),**
- **Loch na Keal NSA,**
- **Outer Firth of Lorn Regional Coastal Character Area (RCAA) – an extensive area of distinctive regional coastal character and seascape.**

The effects identified on Nationally Important landscapes, coastal character and seascape would be widespread out to distances of up to 45 km from the proposal.

The proposal would also introduce a new night-time effect of large-scale lighting into a landscape and seascape with an over-riding dark skies quality. We consider this would result in **significant adverse night-time effects on the Jura NSA and the Outer Firth of Lorn RCCA out to distances in excess of 30 km.**

We consider that the extensive, **significant adverse effects identified, would result from the siting of the WDA, and as such the daytime and unmitigated night-time effects arising from the proposal would not be feasibly overcome by siting, design or other mitigation, fundamentally due to the parameters set by the wider W1 Plan Option Area (POA)**.

As a result, we advise that the proposal does not meet:

- Scotland's National Marine Plan (NMP) General Policy 7 (GEN7)[1] due to significant adverse effects on Special Landscape Qualities (SLQs) of the Jura NSA and the Loch na Keal NSA; and
- National Planning Framework 4 (NPF4) Policy 11e (ii)[2] due to the extensive effects on the distinctive Outer Firth of Lorn RCCA and seascape.

***Marine mammals***

At present, based on the current project design envelope and assessment, we conclude **significant adverse effects from the proposal to minke whale, harbour porpoise, fin whale and humpback whale as a result of injury from piling; harbour porpoise, white-beaked dolphin, white-sided dolphin, bottlenose dolphin, minke whale, harbour seal and grey seal (proposal alone and cumulatively) as well as common dolphin and Risso's dolphin (cumulatively) for disturbance from piling; and to minke whale, humpback whale and fin whale from barrier effects due to underwater noise effects during construction.**

**We currently advise a conclusion of Adverse Effect on Site Integrity (AEoSI) in relation to harbour porpoise of the Inner Hebrides and the Minches Special Area of Conservation (SAC).**

**Additional information is required before we can advise Marine Directorate on a final conclusion of AEoSI** in relation to grey seal at Treshnish Isles SAC and harbour seal at South-East Islay Skerries SAC.

In relation to **minke whale and basking shark of the Sea of Hebrides nature conservation Marine Protected Area (NCMPA)**, we advise that there is a potential **significant risk of hindering the achievement of the Conservation Objectives of the site**.

We advise there could be a **detrimental impact on the maintenance of Favourable Conservation Status for harbour porpoise and potentially bottlenose dolphin (Coastal West Scotland and Hebrides MU). This has implications for EPS licensing.** We advise that an EPS Licence for injury may be required and an EPS Licence for disturbance will be required.

[1] Scotland's National Marine Plan General Policies - Paragraph 4.28: Development and use that affect National Scenic Areas, National Parks and World Heritage Sites should only be permitted where: It will not adversely affect the integrity of the area or its special qualities for which it has been designated.
[2] Scotland's National Marine Plan General Policies - Paragraph 4.30: Scottish Planning Policy (SPP) has been superseded by NPF4 and so we interpret this to mean that NPF4 should be considered for effects on the landscapes stated.


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**We raise concerns that the assessment does not consider in detail designated seal haul-outs and the potential for harassment from repeated disturbance as well as what measures may be required under Section 117 of the Marine (Scotland) Act 2010 (the Act).** Four designated seal haul-outs are affected - Oronsay Strand, South Oronsay, Nave Island and Soa (Mull).

***Ornithology***

At present, we conclude **significant adverse effects to guillemot from the proposal alone and cumulatively to kittiwake** under EIA.

We conclude there will be an **AEoSI from the proposal alone for guillemot at North Colonsay and Western Cliffs Special Protection Area (SPA) and in-combination for kittiwake at Ailsa Craig SPA.**

***Further advice***

Notwithstanding our conclusions of significant adverse impacts for SLVIA, marine mammals and ornithology as summarised above, we have also fully reviewed the EIA Report and accompanying information and provide advice in the appendices of this letter on all other topics within our remit.

We hope this advice is helpful. For any further advice, please contact **[Redacted]** ( **[Redacted]** @nature.scot) in the first instance, copying in our marine energy mailbox – marineenergy@nature.scot.

Yours sincerely,

**[Redacted]**

Head of Marine Energy, Sustainable Coasts and Seas.

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**NATURESCOT ADVICE ON MACHAIRWIND OFFSHORE WINDFARM**

## Appendix A – Policy, proposal, assessment approach and advice on marine physical processes and leatherback turtle

### A.1 Policy context

Working within the context of a climate emergency and a biodiversity crisis, we seek to provide advice that is enabling and secures the right development in the right place with most benefit for climate change reduction and that which avoids damage, and where possible, achieves restoration and enhancement of biodiversity.

As a statutory consultee, NatureScot works in support of the Scottish Government's vision for a Blue Economy with its six outcomes acting as focal points to ensure the marine environment supports ecosystem health, improved livelihoods, economic prosperity, social inclusion and wellbeing.

We provide advice in the spirit of Scottish Government's ambition for Offshore Wind as outlined in the Sectoral Marine Plan for Offshore Wind Energy (SMP-OWE) published in 2020 and now undergoing an Iterative Plan Review (IPR) (anticipated publication later this year) and the Offshore Wind Policy Statement – 40 GW by 2040[3]. The SMP-OWE aims to balance the promotion of the sustainable development of offshore wind, whilst protecting and restoring our biodiversity.

We also acknowledge the Energy Act 2023 reforms and the type and delivery of compensation measures either Applicant-led or through a Scottish Marine Recovery Fund, where required. The SMP-OWE aims to balance the promotion of the sustainable development of offshore wind, whilst protecting and restoring our biodiversity.

In response to the new Scottish Biodiversity Strategy to 2045, we support the current work of the Scottish Government in developing National Marine Plan 2, considering a new policy direction of nature positive requirements for marine industries, including Offshore Wind. We welcome that the Applicant has given positive enhancement some initial consideration, with the submission of a Nature Positive Plan.

### A.2 Background

The Applicant proposes to develop an offshore wind farm with fixed turbines, as part of the ScotWind Leasing Round in the W1 Plan Option Area.

The advice in this letter is in relation to the MachairWind Windfarm Development Area (WDA) only. Separate consent applications are to be submitted for the Offshore Export Cable Corridor (ECC) and Onshore Transmission Development Area (OnTDA) in due course.

The rationale for the separate consenting approach has been attributed to delays relating to confirmation of grid connection location. Although it is noted that a whole-proposal (the WDA, Offshore ECC and OnTDA) assessment has been undertaken commensurate with the level of detail available at the time of carrying out the assessment.

[3] https://www.gov.scot/publications/update-2020-offshore-wind-policy-statement-scotlands-offshore-wind-ambition-2/

We highlight that the Offshore ECC and OnTDA currently lacks a significant amount of detail, and as such the subsequent consent applications for these elements will need to fully address the combined impacts from the proposal as a whole.

**A.3 The proposed development**

The proposed development is located approximately 12.4 km west of Colonsay and 15 km northwest of Islay, covering a seabed area of approximately 448 km$^2$. Water depths in the WDA range from 21.6 m to 81.7 m. The WDA is expected to be capable of exporting around 2 GW and an operational lifespan (from final commissioning) of up to 35 years is anticipated. The proposal follows a Project Design Envelope (PDE) approach and comprises:

- Between 91 and 144 Wind Turbine Generators (WTG's) [4], on fixed foundations.
- WTG capacity is unstated, but total capacity is expected to be approximately 2 GW.
- A maximum blade tip height of 335 m above Lowest Astronomical Tide (LAT) and a maximum rotor blade diameter of 290 m (based on parameters of the Largest WTG).
- Three types of fixed foundations are under consideration, these include monopiles, jackets on pin piles and jackets on suction buckets.
- Up to two Offshore Substation Platforms (OSPs), with fixed foundations. Foundation types under consideration for the OSP(s) are pin pile jackets, suction bucket jackets and gravity base structures (GBS).
- Maximum piling hammer energies are stated as 6,600 kJ for monopiles and 4,400 kJ for pin piles.
- Inter-array cabling (IAC) linking the WTGs together and to the OSP(s), with a total maximum length of approximately 572 km.
- Up to four OSP link cables (linking OSPs together), with a total maximum length of 272 km and minimum Depth of Lowering of 1 m.
- Up to four HVDC offshore export cables, total length of ECC that could be located wholly in the WDA is 200 km (50 km per cable).
- Cable burial is the preferred method of protection, where practicable a Depth of Lowering (DoL) between 1 m – 2 m will be sought for all offshore cables[5]. The minimum proposed DoL for OSP link cables and Offshore ECC(s) is 1 m.
- Where required proposed external cable protection methods include concrete mattresses, rock placement, rock bags and Nature Inclusive Design options. Cable protection is proposed within proximity to WTGs and OSPs.

The construction phase is expected to take up to five years and the earliest point at which WDA construction could commence is expected to be 2030. It is stated that onshore construction works are expected to commence first, however, onshore works are subject to separate consent application(s).

[4] The PDE includes between 91 of the largest (max. 335 m blade tip height and 290 m rotor diameter) and 144 of the smallest (max. 280 m blade tip height and 236 m rotor diameter) WTGs. The non-technical summary (Section 3.3) explains that the total number of WTGs is dependent on WTG generating capacity, which is yet to be determined.
[5] As per Table 3.1, where practicable, DoLs of 1 m to 2 m will be sought for all offshore cable types. This is expected to vary by situation, and up to 3 m may be required in some areas whereas DoLs of 0.3 m may be used for IACs in rocky conditions.


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The operational phase is anticipated to be 35 years; this will include a programme of maintenance.

Decommissioning is briefly addressed in Section 3.6.16 (Chapter 3, Project Description). We advise that that development of a Decommissioning Plan / Programme should be informed by current requirements and predicted on full removal of all infrastructure in line with current policy[6].

**A.4 Assessment approach**

The Applicant has largely followed standard EIA and HRA processes as well as our pre-application advice and guidance. Information contained within the Offshore EIA Report, RIAA and Report to Inform Marine Protected Areas Assessment and has been well laid out, which has aided our review and understanding of the information provided within the application, for which we thank the Applicant.

*A.4.1 Significance matrices*

In the past, we have noticed a tendency for offshore wind farm EIA Reports to include descriptions of sensitivity and magnitude scoring, as well as significance matrix tables, that are weighted towards negligible outcomes. This results in conclusions reached in impact assessments that are likely to be underplaying impacts. However, it is very welcome the approach taken for this application.

There are some instances where we do not agree with the negligible magnitude scoring, which by changing to low would lead to a moderate significance overall. In these instances, using our expert judgement, we are content that the overall impact is not significant in EIA terms – we have detailed this in our advice in the relevant appendices.

**A.5 NatureScot advice**

As noted in the cover letter, we have provided our detailed receptor-specific advice within the appendices of this letter. Our advice on the assessment of impacts to the marine physical environment and leatherback turtles is provided below.

*A.5.1 Marine physical environment*

We have reviewed the EIA Report with respect to the marine physical environment (Chapter 7) and are content that all relevant impacts have been identified and assessed. The assessment concludes no significant impacts alone or cumulatively, which we agree with.

*A.5.2 Leatherback turtle*

The assessment for leatherback turtle is included within Chapter 10 of the EIA Report. As set out in Table 10.2, the number of turtles recorded during the survey campaign has been clarified following Scoping, with confirmation that a single individual was recorded in 2022 within the WDA.

Appendix 10.2 (Marine Mammals and Leatherback Turtle Baseline) discusses the sensitivity of leatherback turtle and there appears to be some discrepancies in the scores assigned in Section 9 (Appendix 10.2) and to those detailed in Table 10.84 (Chapter 10). However, this does not change the Applicants' overall conclusions, that there will be no significant effects to leatherback turtle from the proposal alone or cumulatively, which we agree with.

[6] https://www.gov.scot/publications/offshore-renewable-energy-decommissioning-guidance-scottish-waters/



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**NATURESCOT ADVICE ON MACHAIRWIND OFFSHORE WINDFARM**

## Appendix B – Seascape Landscape and Visual Impact Assessment (SLVIA)

### B.1 Summary of NatureScot advice

The Proposed Development would result in **significant adverse effects on:**

- **Jura National Scenic Area (NSA)**
- **Loch na Keal NSA and,**
- **Outer Firth of Lorn Regional Coastal Character Area (RCAA) – an extensive area of distinctive regional coastal character and seascape.**

The effects identified on Nationally Important landscapes, coastal character and seascape would be widespread out to distances of up to 45 km from the proposal.

The proposal would introduce a new night-time effect of large-scale lighting into a landscape and seascape with an over-riding dark skies quality. We consider this would result in significant adverse night-time effects on the Jura NSA and the Outer Firth of Lorn RCCA out to distances in excess of 30 km.

We consider that the extensive, significant adverse effects identified, would result from the siting of the WDA, and as such the daytime and unmitigated night-time effects arising from the proposal would not be feasibly overcome by siting, design or other mitigation, fundamentally due to the parameters set by the wider W1 Plan Option Area (POA).

As a result, we advise that the proposal does not meet:

- Scotland's National Marine Plan (NMP) General Policy 7 (GEN7)[7] due to significant adverse effects on Special Landscape Qualities (SLQs) of the Jura NSA and the Loch na Keal NSA; and
- National Planning Framework 4 (NPF4) Policy 11e (ii)[8] due to the extensive effects on the distinctive Outer Firth of Lorn RCCA and seascape.

### B.2 Background information

The proposal would be located within the W1 POA, approximately 12.4 km west of the islands of Colonsay and Oronsay, 15 km north-west of Islay, 20 km south-west of Mull and Iona, and 30 km west of Jura.

There are two designs included within the PDE to enable the proposal to achieve a 2 GW scheme - 91 turbines at 335 m and 144 turbines at 280 m. For the SLVIA, the proposal has been assessed on a WCS, which has been selected as the 91 turbines at 335 m maximum blade tip.

[7] Scotland's National Marine Plan General Policies - Paragraph 4.28: Development and use that affect National Scenic Areas, National Parks and World Heritage Sites should only be permitted where: It will not adversely affect the integrity of the area or its special qualities for which it has been designated.

[8] Scotland's National Marine Plan General Policies - Paragraph 4.30: Scottish Planning Policy (SPP) has been superseded by NPF4 and so we interpret this to mean that NPF4 should be considered for effects on the landscapes stated.



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As the turbines would be over 150 m in height, visible aviation lighting would be required in line with the Civil Aviation Authority (CAA) Air Navigation Order 2016.

There are no operational onshore or offshore wind energy developments within the 60 km radius study area.

**B.3 Focus of advice**

Our approach to advising on wind farm applications is to generally focus upon impacts on Scotland's landscapes that could potentially raise issues of national interest. This advice focuses on the potential for significant adverse effects resulting from the offshore component of the proposal on the Special Landscape Qualities (SLQs) of the Jura NSA, Loch na Keal NSA and Scarba, Lunga and the Garvellachs NSA as well as the seascapes, coastal character and landscapes of the distinctive surrounding coast. This should not be interpreted as meaning there are no other significant landscape effects that need to be considered when determining the application.

Reference has been made to the Jura Wild Land Area (WLA) both within the SLVIA and this advice due to the commonality between some attributes of the WLA qualities and SLQs of the Jura NSA. Given the location of the WLA, around 28 km from the proposal, it was agreed with NatureScot in pre-application discussions that a Wild Land Assessment would not be required.

This advice focuses on impacts from the operational and maintenance phase of the proposal as effects of this phase are long term / permanent and expected to last for a minimum of 35 years.

**B.4 The Applicants' assessment of effects**

The Applicant has undertaken an assessment of effects on the SLQs of the Jura NSA, Loch na Keal (Mull) NSA and the Scarba, Lunga and the Garvellachs NSA (Appendix 16.2). The assessment concludes that there would be no significant effects on the SLQs of the Loch na Keal (Mull) or the Scarba, Lunga and the Garvellachs NSAs. Significant adverse effects on three SLQs of the Jura NSA have been identified as follows:

- *SLQ 1: The distinctive Paps of Jura;*
- *SLQ 4: Large tracts of wild land; and*
- *SLQ 8: The inaccessible Loch Tarbert.*

The assessment does not provide a conclusion on whether the effects on the Jura NSA would be to a degree where the overall integrity of the NSA would be affected.

The SLVIA reports that significant adverse daytime landscape effects would arise on eight Landscape Character Types (LCT) and eleven Coastal Character Areas (CCA) surrounding the proposal from Colonsay, Oronsay, Islay, Jura, Mull, and Iona out to around 20 km south-east, 40 km east and 25 km north-east from the proposal.

Significant adverse daytime visual effects have been concluded on 16 of the 30 viewpoints from Colonsay, Oronsay, Islay, Jura, Mull, and Iona out to around between 16-39 km from the proposal. In addition, there would be significant effects on visual receptors at settlements and travelling on routes from Colonsay, Oronsay, Islay, Mull, and Iona.


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Significant adverse night-time effects would arise on LCTs and CCAs of Colonsay, Oronsay and Islay located within approximately 20 km of the proposal. It was concluded that indirect night-time effects on landscape and coastal character beyond 30 km would not be significant.

Significant adverse night-time effects would arise from 10 viewpoints (VPs 1-5, 9, 13-16 – Islay, the Colonsay-Port Askaig Ferry, Colonsay, and Oronsay) under both the 2000 candela (cd) and 200 cd lighting intensity scenarios, and three viewpoints (VPs 20-22 Mull, Mull-Iona Ferry and Iona) under the 2000 cd scenario alone.

No significant cumulative daytime or night-time landscape and visual effects have been identified in the SLVIA above that of the effects identified from the proposal alone.

**B.5 NatureScot appraisal of impacts**

Our review of the SLVIA and the Applicants' assessment of effects on the SLQs of the NSAs has identified differences in effects predicted for the Jura NSA and Loch na Keal (Isle of Mull) NSA. In addition, whilst we broadly agree with the effects identified in the SLVIA on coastal character areas, we consider that on aggregate the resulting effect would be extensive on the surrounding coast and seascape at the regional level which is not clearly expressed in the SLVIA. We have therefore deemed it necessary to carry out our own appraisal of effects to interrogate impacts and identify where our conclusions differ to that of the SLVIA. Our appraisal has been informed by site visits.

*B.5.1 National Scenic Areas*

This section of advice informs the consideration in views from and experience of the proposal from the NSAs and their SLQs. This aspect takes into consideration that impacts on SLQs from offshore projects are generally not physical but experiential and / or perceptual and are not solely limited to how the wind farm appears in views (visual impact).

*B.5.1.1 Jura NSA*

The Jura NSA is located around 26 km to the south-east of the proposal. It covers the entirety of the south of the island, extending around the northern coastline and hinterland of Loch Tarbert. Southward from the northern extents of Loch Tarbert, the NSA also captures part of the Jura, Scarba, Lunga and the Garvellachs WLA.

A review of the Zone of Theoretical Visibilities (ZTVs) for the proposal show that visibility would be possible from much of the west coast of the NSA between Loch Tarbert and the Allt Bun an Eas (Figure A16.2.1, Appendix 16.2). Visibility would extend outward from the west coast to the south and south-east capturing the Paps of Jura and the surrounding Plateau Moorlands. From the east of the NSA, visibility would largely be precluded by the central elevated, mountainous spine of Jura, with the elevated Plateau Moorlands of the north-eastern tip of Islay inhibiting views from the south-western extents of the NSA.

We are broadly in agreement with the SLVIA / SLQ Assessment in that there would be significant effects on three SLQs of the Jura NSA (SLQ1 - *The distinctive Paps of Jura*, SLQ4 - *Large tracts of wild land*, and SLQ8 - *The inaccessible Loch Tarbert*). Given the location of the proposal, effects would be on experiential and perceptual responses, affecting the perception of remoteness, sense


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of naturalness and wildness, and on the '*unparalleled views to the Inner Hebrides'*. These effects would be experienced from an extensive western area of the NSA to include the Plateau Moorlands LCT coastal hinterland, Rugged Mountains LCT (the Paps of Jura), coastline between Loch Tarbert and the Allt Bun an Eas, and the seascape of Loch Tarbert as demonstrated by viewpoints 10 (Loch Tarbert) and 11 (Beinn an Oir).

**As such, we are in agreement with the SLVIA, that there would be significant effects on three SLQs of the Jura NSA**

- **SLQ1 - *The distinctive Paps of Jura*,**
- **SLQ4 - *Large tracts of wild land*, and**
- **SLQ8 - *The inaccessible Loch Tarbert.***

**We consider that these effects would be extensive over the western area of the NSA out to around 34 km from the proposal, affecting the perception of remoteness, sense of naturalness and wildness, and the '*unparalleled views to the Inner Hebrides*'.**

Contrary to the SLQ assessment, we consider that there would also be a significant effect on:

- SLQ7 - *An island close yet remote*.

Whilst we agree that there would be no direct physical effect on the long journey required from the mainland to access Jura, the proposal would diminish the perception of remoteness and being *'at the edge',* to a degree which we consider would be significant. From the west coast of the NSA, the presence of the sea is '*all-pervading'*. The surrounding seascape exhibits a high degree of perceived naturalness and wildness, with the island of Colonsay forming the focal point of views from much of the rugged, low-lying coast. The siting of the proposal would affect the inspiring and arresting qualities of the expansive seascape experienced from the NSA (viewpoint 11: Beinn an Oir). It would introduce a large-scale man-made development which would form a new focal point, diminish the scale of the seascape and erode the perception of naturalness, wildness, sense of remoteness and perception of separation from the 'modern world' which can be experienced from the west coast of the NSA (viewpoint 10: Loch Tarbert).

**Contrary to the SLVIA we consider that there would be a significant effect on SLQ7 – *An island close yet remote*.**

*B.5.1.2 Loch na Keal (Isle of Mull) NSA*

The Loch na Keal, Isle of Mull NSA is located around 31 km to the north-east of the proposal. The NSA covers the Loch Tuath and Loch na Keal seascape including the islands of Ulva, Gometra, Treshnish, Staffa, numerous other offshore islets, and the surrounding coastline and hinterland. The NSA borders the Central, South and West Mull Local Landscape Area (LLA) to the north, east and south, with an area of the Ben More (Mull) WLA within the NSA to the east.

We are broadly in agreement with the SLVIA / SLQ Assessment that effects on SLQ1, SLQ 2 and SLQ 4 would be not significant. However, contrary to the SLVIA, we consider that effects on:

- SLQ6 - *A vast, natural world, dwarfing human settlement* and
- SLQ7 - *World famous Staffa and Fingal's Cave* would be significant.


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The proposal would be experienced from much of the NSA (Figure 16.2.2, Appendix 16.2), overtopping the peninsula of the Ross of Mull and the island of Iona and its outlying islets (Viewpoints 24, 25 and 26). Whilst the Ross of Mull is out with the NSA boundary, in views from the northern coast and hinterland of the NSA, it provides a natural visual containment to Outer Loch na Keal, with the seascape south-westward perceived as inseparable from and part of the NSA, *'although covering an extensive area, the seascape, island and coastal landscapes are an indivisible whole. The eye is swept down from the hills, along the coastline of Loch na Keal and out to sea'.* Therefore, we consider that the proposal would affect this experience by introducing a new dominant intrusive very large-scale focal point of man-made development, challenging the *'sea dominant scene'* and eroding the sense of naturalness and the perception that '*nature is dominant, impervious to humans and their actions'* of SLQ6.

**Contrary to the SLVIA, we consider there would be a significant effect on SLQ6 - *A vast, natural world, dwarfing human settlement.***

We agree with the SLVIA that the proposal would not affect the physical characteristics of the island of SLQ 7 - *World famous Staffa and Fingal's Cave.* However, we disagree on effects relating to *'grand panoramas in all directions'*, and perception of the island as '*remote'*. The proposal would be clearly visible from Staffa and the wider Treshnish Islands as a new man-made development which would replace Iona as the focal point of panoramic views south and south-west. We consider that distance does not mitigate the magnitude of effects on the panoramic '*wide and grand vista across the sea'* towards Iona and the Ross of Mull and the experiential quality of remoteness, to a degree where effects can be judged as not significant, as inferred in the SLVIA.

**Therefore, contrary to the SLVIA we consider there would be a significant effect on SLQ7 - *World famous Staffa and Fingal's Cave.***

*B.5.2 Regional Coastal Character and Seascape*

The SLVIA identifies significant effects on eleven CCAs spanning from Iona, Mull, Jura, Colonsay, Oronsay and Islay out to around 40 km from the proposal to the east and 30 km north-east and south-east (Figure 16.11, Chapter 16). These have all been attributed a high value and high sensitivity which we agree with. We also broadly agree with the effects identified in the SLVIA on the CCAs assessed and the method of assessment. However, we consider that whilst effects on individual CCAs has been quantified in the SVLIA, we consider this to be at the Local Coastal Character Area (LCCA) scale as opposed to the stated regional scale[9]. **It is our view that establishing coastal character at a regional scale is a key step, appropriate for the proposal given its siting and scale, which we consider is currently absent from the SLVIA**. '*Irrespective of the scale of characterisation to be the focus of the study, the Regional Coastal Character Area level needs to be established (where it does not yet exist). This may encompass a whole sound or kyle, inner sea loch or firth and allows a wider contextual description of character and inter-visibility'*[10].

[9] Machair Offshore Wind Farm Appendix 13.3: Coastal Character Baseline and Assessment – Paragraph 1.1
[10] SNH (2017) Guidance on Coastal Character Assessment – Paragraph 4.14


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During the process of undertaking comprehensive field work as part of our appraisal of the SLVIA, we have identified an overarching broader scale Coastal Character Area at the regional level. The Regional Coastal Character Area identified shares a broadly similar area to the South Mull / Colonsay / West Jura / Sound of Islay (Seascape Area 23; page 91), also including the south-west Mull and Iona area (Seascape Area 21; page 87) and north-east coast of Islay (Seascape Area 22; Page 89) mapped in the Commissioned Report No. 103 - An assessment of the sensitivity and capacity of the Scottish seascape[11] (Seascape Unit Area 23 - South Mull-Colonsay-West Jura-Sound of Islay). The coastal character of this seascape is predominantly Low, Rocky Island Coasts (Type 13; Coastal Character Types Description) with the north-eastern extent comprising Sounds, narrows and islands (Type 9; Coastal Character Types Description). In line with the NatureScot Coastal Character Assessment guidance[12] naming criterion the area will hereinafter be referred to as the Outer Firth of Lorn RCCA.

To establish the baseline seascape, landscape, visual and experiential characteristics which underpin the RCCA, we have drawn on the surrounding seascape units, LCTs, the SLVIA CCAs assessment, and field work. This process has also been informed by the Landscape Institute Technical Guidance Note 02-21[13] and NatureScot Coastal Character Assessment guidance. The baseline key physical and experiential characteristics of the RCCA have been set out in Annex 1 to this advice.

The containing coast, hinterland and landscape of the Outer Firth of Lorn RCCA comprise of continuously designated landscapes at both the local and national level, including four local landscape areas (North and West Islay, Jura, Knapdale / Melfort, and Central, South and West Mull) and two NSAs (Jura and Scarba, Lunga and the Garvellachs). The nationally important Jura, Scarba, Lunga and the Garvellachs WLA is also captured (Figure 16.13, Chapter 16). The surrounding coast is predominantly undeveloped. Where development is present it is low-key, contained to a few isolated bothies on Jura, and small individual crofts on the south-west coast of Mull, which have negligible influence when experienced from the sea, ferry routes and inter-visible opposite and adjacent island coasts. Taking this and the key underpinning characteristics of the RCCA into consideration, it is our view that the value of the RCCA is high, susceptibility to the type and scale of development proposed is high and overall sensitivity is judged to be high. Conclusions in the SLVIA confirm this judgement (Appendix 16.3; Coastal Character Baseline and Assessment) with a high value and high sensitivity attributed to the component CCAs of the wider RCCA.

The site of the proposal is located just outside the western extent of the Outer Firth of Lorn RCCA and seascape, where it forms part of the wider seaward skyline experienced in surrounding views from a wide geographical extent. The extent of visibility would span from the Firth of Lorn in the

[11] SNH Commissioned Report No. 103: An assessment of the sensitivity and capacity of the Scottish seascape in relation to windfarms

[12] SNH (2017) Guidance on Coastal Character Assessment: https://www.nature.scot/professional-advice/landscape/coastal-character-assessment

[13] Landscape Institute Technical Guidance Note 02-21: Table 1 - Range of factors that can be considered when identifying landscape value - LI TGN 02-21: https://landscapeinstitute.org/publication/tgn-02-21-assessing-landscape-value-outside-national-designations/



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east (Viewpoint 17: Oban – Colonsay Ferry) to the open Atlantic Ocean, from widespread northward, westward and southward looking views from coastal edges and hinterland associated with the surrounding islands (Viewpoints 9, 10, 11, 12, 17, 18, 19, 20 and 23). The proposal would introduce a new dominant intrusive very large-scale focal point visible on the seaward skyline where it would be experienced by both land and sea-based receptors from a large geographical extent of the RCCA (Figure 16.3, Chapter 16). It would be visible behind and around Colonsay, overtopping the island from much of the RCCA, significantly affecting the over-riding sense of naturalness which is strongly expressed throughout due to the predominantly un-developed nature of the coast and hinterland, and overall absence of man-made development. The experiential qualities of wildness, remoteness, and to some degree isolation, would be significantly affected throughout. From the western extent of the RCCA the sense of being on the 'edge of ocean' and expansive views of the sea would be significantly affected. From a majority of the indented bays of the RCCA, the proposal would be clearly visible, significantly affecting framed views and experiential qualities associated with these secluded, isolated areas which are largely only accessible by boat or by long walks in on foot.

The surrounding national landscape designations and nationally important landscape special qualities are predominantly underpinned by the influence of the coast and seascape. We consider that the proposal would significantly affect the contribution the RCCA and its seascape makes to the experiential characteristics inherent in the special qualities of adjacent national landscape designations and nationally important landscapes (Viewpoints 10, 12, 18, 24)[14]. Interpreting effects identified in the SLVIA[15] at this broader, regional scale, proposal would be experienced sequentially from a majority of the Southern Inner Hebridean islands of Mull, Iona, Islay, Jura, Colonsay, and Oronsay including from key ferry and boat charter routes. When considering effects from the proposal on coastal character holistically, it is our view, that this would translate to extensive, significant adverse effects on the experiential characteristics of the surrounding coast and seascape of the overarching Outer Firth of Lorn RCCA. We consider that overall, these effects would be significant adverse out to distances of up to 45 km from the proposal.

**We consider the proposal would result in extensive significant adverse effects on the Outer Firth of Lorn RCCA and seascape, and the contribution it makes to the special qualities of surrounding Nationally Important landscapes. Effects would be widespread out to distances of up to 45 km from the proposal.**

*B.5.3 Visible aviation lighting*

The SLVIA concludes that impacts on CCAs and LCTs at distances greater than 30 km would be not significant. Based on the information provided, we disagree and consider that there would be a significant night-time effect on SLQs 4, 7 and 8 of the Jura NSA given that night-time effects on the underpinning CCAs and LCTs of the NSA have been identified in the SLVIA.

We also consider that there would be a significant night-time effect on the wider RCCA, given the extensive visibility of the proposed visible aviation lighting as demonstrated by the aviation

[14] Landscape Institute Technical Guidance Note 02-21- Table 1
[15] SLVIA Section 16.15 - Summary


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lighting ZTV (Figure 16.17, Chapter 16). This extensive visibility, combined with the predominant absence of baseline lighting within the RCCA, would result in the proposal introducing a new night-time effect of large-scale lighting into a coastal landscape and seascape with an over-riding dark skies quality, as demonstrated by the night-time visuals (Viewpoints 3, 5, 14, 16 and 21). Consequently, we consider effects from the proposed lighting on the experiential characteristics of the RCCA would be out to distances of greater than 30 km. This is evidenced by the visibility of the perimeter lighting to turbines located along the far western boundary of the array at around 35 km from the west coast of Colonsay (Viewpoint 14).

**The proposal would introduce a new night-time effect of large-scale lighting into a coastal landscape and seascape with an over-riding dark skies quality. This would result in significant adverse night-time effects on SLQs 4, 7 and 8 of the Jura NSA and the Outer Firth of Lorn RCCA. With reference to CAA Policy and Guidelines on Wind Turbines[16] and the need for visible aviation lighting we would strongly advise the applicant to seek approval for use of Aviation Detection and Obstacle Lighting Systems (ADLS) to assist with mitigating night-time effects.**

### B.6 Cumulative effects

No cumulative effects have been identified within the SLVIA as there are currently no operational, at application or scoping stage wind energy schemes within the 60 km study area. We agree with this conclusion. The pre-scoping stage Malin Sea Offshore Wind Farm would be located approximately 42 km south from the proposal, however, details of the proposed scheme are not currently available.

### B.7 Design mitigation

The SNH/NatureScot Sectoral Plan for Offshore Wind Design Guidance[17] identified key considerations for defining the WDA boundary within the W1 POA. In summary, design of the proposal should seek to reduce significant effects through limiting development to distances beyond 35 km *'from all surrounding coastal edges to reduce effects on distinctive coast character, strong frontier qualities and culturally important features such as Iona'* and should employ a '*200m maximum turbine height…turbines lower than 200m should be explored to further mitigate significant effects'*.

In our Scoping Response dated the 22 November 2024, we reiterated our pre-scoping advice, reiterating our concerns over the WDA boundary and visibility of the proposal from the surrounding coastal landscape (to include the Jura NSA, Loch na Keal NSA and the Scarba, Lunga and the Garvellachs NSA) to that of the pre-scoping WDA boundary.

To date the design development for refining the WDA boundary has considered the following for reducing landscape and visual effects[18]:

[16] Civil Aviation Authority (2026) CAA Policy and Guidelines on Wind Turbines, CAP 764: https://www.caa.co.uk/data-and-publications/publications/documents/content/cap-764/

[17] SNH/NatureScot: Sectoral Plan Consultation - Landscape and Visual Impact Assessment Design Guidance: www.nature.scot/doc/sectoral-plan-consultation-summary-and-design-guidance

[18] SLVIA: Table 16.14 - Embedded mitigation measures for seascape, landscape and visual receptors

- *The northern, eastern and southern boundaries of the WDA have been refined, resulting in an overall reduction of the WDA by approximately 40%, when compared with DPO W1*[19]*;*
- *The southern and eastern boundary of the WDA has been defined by implementation of a buffer of at least 12km from the nearest points of Islay and Colonsay;*
- *Refinements to the northern boundary (relating to the maintenance of the Dubh Artach lighthouse) have reduced the potential horizontal spread of WTGs from specific viewpoints on the islands of Mull and Iona.*

On review of the information provided, we consider the above design development since scoping has not reduced visibility of the vertical extent of the array, and subsequently, influence of the proposal from surrounding nationally designated landscapes and distinctive coastal character and seascape. The submission of the 144-turbine layout (2 GW scheme) has been helpful to understand if effects could be reduced through smaller height to blade tip turbines. However, we consider that this layout would result in similar effects, over a similar geographical extent to those identified for the 91-turbine scheme. There would also be the potential for intensified night-time effects due to the requirement for lighting to more turbines than that of the 91-turbine layout, and issues relating to horizontal extent of the array and visual composition.

**We welcome the design mitigation measures and commitment to seascape, landscape and visual project design objectives[20]. However, it is our view that the extensive, significant adverse effects identified on surrounding nationally designated landscapes, and on regional coastal character and seascape, would result from the siting of the WDA. We consider that daytime effects and unmitigated night-time effects arising from the proposal would therefore not be feasibly overcome by siting, design or other mitigation, fundamentally due to the parameters set by the wider W1 POA.**

[19] EIA Chapter 4 Site Selection and Alternatives: Figure 4.2 (W1 DPO Area 754 km$^2$, Scoping WDA 510 km$^2$, proposal WDA 448 km$^2$)

[20] EIAR: Appendix 15 – Design Strategy Document



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**B.8 Annex B1**

To establish the baseline seascape, landscape, visual and experiential characteristics which underpin the RCCA, we have drawn on the surrounding seascape units, LCTs, the SLVIA CCAs assessment, and field work. This process has also been informed by the Landscape Institute Technical Guidance Note 02-21[21] and NatureScot Coastal Character Assessment guidance. The following sets out the baseline key physical and experiential characteristics of the RCCA:

*Key characteristics*

- 'Fragmented' island coastlines - a seascape of distinctive and contrasting island groups of varying distinctive character, landscape features and coastlines with high inter-visibility between the islands;
- island coasts are low and rocky with dramatic mountain backdrops (Jura and Mull) - the combination of mountains with coast and sea provides particularly high scenic quality and drama;
- numerous offshore islands and islets which contribute to a wild and rugged, diversely scenic coast;
- Seascape and coastal character which is important to the appreciation of several designated landscapes and contributes to their special qualities with a strong association with adjacent national and local landscape designations.

*Maritime influence and experience from the sea*

- Key ferry routes afford a unique and immersive experience of the largely undeveloped seascape and surrounding coastline with continuous views of islands and sea;
- wild, remote 'edge of ocean' qualities from the western extent of the RCCA;
- the sea amplifies the sense of remoteness which enhances the isolated stretches of land and coast of much of this area.

*Character of the coastal edge*

- Generally low rocky coastline, rising to cliffs in places, caves, raise beaches;
- dramatic stepped terraces and cliffs along the south Mull coastline and Jura;
- form is complex locally but from a distance the coastal areas comprise a narrow strip between a simple hinterland and wide expanses of open sea;
- offshore islands and islets, diverse in character.

*Character of immediate hinterland*

- Remote and wild - very remote areas of strong wild land character - remote feeling seascape due to hinterland of largely undeveloped moorland and exposure to the open sea, with moorland areas exhibiting strong remote and natural qualities.

*Extent of human activity*

- the coastline and immediate hinterland is predominantly undeveloped with an over-riding sense of naturalness as a result;
- Settlement is very sparse or absent for much of this area with human activity contained to small individual crofts on the south-west coast of Mull;

[21] Landscape Institute Technical Guidance Note 02-21: Table 1 - Range of factors that can be considered when identifying landscape value - LI TGN 02-21


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- the surrounding coastline and smaller islands have a strong perceived sense of remoteness and isolation and are largely only accessible by long journeys on foot or by boat;
- prevailing dark skies;
- un-developed, remote and rugged stretches of coast with a strong sense of exposure throughout;
- All-pervading influence of the sea and sense of being perched on the edge of the land.

*Views and visibility*

- 'all round' views, presence and closeness of the sea;
- Expansive views from the western extent of the RCCA;
- Inter-visibility of adjacent island coastlines throughout;
- Heavily indented coastline provides framed views from indented sandy bays;
- ridgelines and hill profiles are prominent features in wider views from adjacent coasts and hinterland;
- the island of Colonsay is a focal point in views from Mull and Jura and Islay westwards, also from ferry routes;
- overall lack of presence of existing marine and coastal developments.

*Representative viewpoints*

- Viewpoints 9, 10, 11, 12, 17, 18, 19, 20 and 23 baseline photography is representative of the above physical and experiential characteristics of the RCCA.


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**NATURESCOT ADVICE ON MACHAIRWIND OFFSHORE WINDFARM**

## Appendix C - Marine mammals

Marine mammal (and leatherback turtle) interests are considered in Chapter 10 (Volume 2) and the following relevant supporting documents:

- Volume 3a - Technical Appendix 9 - Draft Marine Mammal Mitigation Protocol
- Volume 3c – Technical Appendices 10.1 – 10.6
- Volume 3c – Technical Appendix 11.2 – Baseline Site Characterisation
- RIAA – Parts 1 and 2
- Report to Inform the Marine Protected Areas Assessment
- Habitat Regulations Assessment – Screening Report

Please note our advice on leatherback turtle is contained within Appendix A of this letter.

### C.1 EIA summary

The Applicant has concluded no significant effects from the proposal alone or cumulatively. We disagree and conclude there will be **significant effects from the proposal alone and cumulatively** for:

- Auditory injury (in terms of cumulative Permanent Threshold Shift (PTS)) for minke whale, harbour porpoise, fin whale and humpback whale;
- Disturbance from piling activities (proposal alone and cumulatively) for harbour porpoise, white-beaked dolphin, grey seal, white-sided dolphin, bottlenose dolphin, minke whale and harbour seal as well as cumulatively for Risso's dolphin and common dolphin; and
- Barrier effects due to underwater noise for minke whale, humpback whale and fin whale.

**We require additional information on iPCoD modelling (for four species - harbour porpoise, minke whale, harbour seal and grey seal)** which should include the following:

- updated iPCoD modelling to be carried out using the Dose-Response Curve (DRC) to calculate the potential number of animals disturbed;
- confirmation that the worst-case scenario included within the modelling has been recognised and assessed;
- use of predicted post-mitigation numbers of affected animals in the model;
- recalculation of piling duration and the number of days with piling activity taking place used as a parameter; and
- confirmation of the number of harbour porpoise with the potential for auditory injury (cumulative PTS).

**We also require barrier effects from underwater noise to be re-assessed based on the revised iPCoD modelling, and explicit consideration of whether the 145 dB contour is an appropriate threshold to apply.**

**We advise there is significant risk of hindering the achievement of the Conservation Objectives for minke whale of the Sea of Hebrides NCMPA from disturbance from construction activities; potential collision from vessels and through barrier effects from underwater noise.**



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**In addition, we also raise concerns that the assessment does not sufficiently consider designated seal haul-outs and the potential for harassment from repeated disturbance as well as what measures may be required under Section 117 of the Marine (Scotland) Act 2010 (the Act).** Four designated seal haul-outs are affected - Oronsay Strand, South Oronsay, Nave Island and Soa (Mull).

Before the application can be progressed, we advise that:

- further mitigation measures – such as Noise Abatement Systems (NAS) and seasonal restrictions – should be explored, and their effectiveness established;
- Marine Directorate should consider whether an EPS licence for disturbance and potentially injury could be issued based on the current proposal parameters and the potential number of animals disturbed / injured based on DRC outputs; and
- a piling programme is produced which clearly defines the worst-case spatial and temporal piling scenarios.

Finally, after proposal alone impacts have been better established, cumulative impacts will require re-assessment.

**C.2 RIAA Summary**

The Applicant concludes no AEoSI from the proposal alone or in-combination. We disagree and conclude **AEoSI from the proposal alone** for:

- **Harbour porpoise at Inner Hebrides and the Minches SAC.**

**Additional information is required to assess the effects of other impacts on the above SAC.** Specifically, we require additional information on:

- predicted impacts from geophysical surveys; prey availability; disturbance to seal haul-out sites (for Treshnish Isles SAC); underwater noise impacts including barrier effects; and non-piling activities.

**Additional information is also required before we can advise Marine Directorate on site integrity for harbour seal at South-East Islay Skerries SAC and grey seal at Treshnish Isles SAC.** Specifically, we require additional information on:

- the proposal alone impacts from piling, prey availability and barrier effects to South-East Islay Skerries SAC and Treshnish Isles SAC.

**C.3 NatureScot advice on EPS licencing**

With the current piling parameters and mitigation proposed, there is a risk of injury to marine mammals and an EPS licence for injury would be required.

The numbers of harbour porpoise and bottlenose dolphin predicted to be disturbed represent a very high proportion of the relevant Management Unit (MU) population for each species. **In our view there is likely to be a detrimental impact on the maintenance of Favourable Conservation Status for harbour porpoise and possibly bottlenose dolphin.**

**C.4 Baseline characterisation**


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It is clear from the EIA Report and supporting information that the WDA is an important area for marine mammals. Several protected sites – the Inner Hebrides and the Minches SAC, Treshnish Isles SAC, South-East Islay Skerries SAC and the Sea of the Hebrides NCMPA, as well as a number of designated seal haul-out sites are all located in proximity to the proposal. From the various data and information sources presented in Sections 10.4 and 10.5, it is clear there is extensive species diversity and density in the area, which is far greater than that typically observed at North Sea development sites.

*C.4.1 Existing and site-specific survey data*

We welcome the broad range of sources and surveys undertaken to support the EIA. The inclusion of Hebridean Whale and Dolphin Trust (HWDT) visual and acoustic data, Marine Mammal Observer (MMO) data conducted during geophysical surveys as well as the two separate Digital Aerial Survey (DAS) campaigns have been very helpful to aid understanding of the occurrence of cetaceans and seals within the WDA.

While the multi-year HWDT acoustic data were collected during transits and not designed to specifically survey the WDA, they have confirmed harbour porpoise presence, where this species is typically more often detected acoustically than visually. As highlighted in the HWDT acoustic data analysis report (Appendix 10.3), the Scottish west coast and WDA can be considered a marine mammal 'hot-spot'.

We note that the DAS campaign was conducted between April 2021 and September 2023 and the additional third-party campaign was conducted between October 2020 and December 2021. It is unclear from the data presented whether the differing survey campaigns results have been combined where they overlap in time (April 2021 - November 2021). This would be appropriate as the same contractor conducted both surveys (APEM).

From the DAS results, we note that counts of the four most sighted species (grey seal, common dolphin, harbour porpoise and minke whale) were higher in each month of the third-party DAS than the proposal DAS. It is unclear which dates in each comparative month the surveys were conducted, but it can be assumed that they were not flown on the same day, meaning the raw count data could be combined. As the report from the third-party DAS campaign has not been included, it is not possible to calculate the estimated abundance using APEM's method, which in turn does not allow for the calculation of updated density estimates for species between April 2021 and November 2021.

Appendix 10.2 includes visual data of marine mammals recorded during geophysical surveys. Two surveys are included; August – November 2023 and April – July 2025. It is noticeable that while sightings of common dolphins were made in every month of these surveys, very few sightings of harbour porpoise were reported. This does not align with the DAS survey results and may indicate that survey conditions were incongruous for harbour porpoise (e.g., high sea states), the surveys had a disturbing effect to porpoise or are indicative of MMO experience.

*C.4.2 Species information and density estimates*

Overall, we are content with the marine mammal species taken forward for assessment as identified from the baseline data and desktop studies, which include:

- Harbour porpoise
- Bottlenose dolphin


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- Short-beaked common dolphin
- Atlantic white-sided dolphin
- White beaked dolphin
- Risso's dolphin
- Long-finned pilot whale
- Killer whale
- Minke whale
- Fin whale
- Humpback whale
- Grey seal
- Harbour seal

We note that the baseline information for bottlenose dolphin does not include detailed information on the wide-ranging inshore Scottish west coast population nor the more resident Barra community (Van Geel, 2016[22]). The ecology and occurrence of the inshore population is relevant to the proposal, as they are wide-ranging and appear to utilise the entirety of the Inner Hebrides.

**C.5 Assessment approach**

In reviewing the assessment approach in Chapter 10, supporting Technical Appendices, Annexes, RIAA and Report to Inform Marine Protected Areas Assessment, we have set out advice where it relates to specific clarification or additional information requirements.

*C.5.1 Embedded mitigation*

Embedded mitigation measures are detailed in Section 10.10 of the EIA Report. It is noted in Paragraphs 73 and 74 (Chapter 10) that the assessment for impact piling has been undertaken without embedded mitigation incorporated into the initial quantitative modelling (except soft-start and ramp-up). However, it is subsequently considered qualitatively on the basis of all embedded mitigation measures outlined in Table 10.8. At present, there is little detail on the mitigation measures as they relate to the production of and adherence to post-consent plans rather than measures that will mitigate impacts. Further advice on embedded mitigation is provided within our advice below.

*C.5.2 Significance of effects*

The assessment clearly lays out criteria for determining sensitivity of a receptor and the magnitude of an impact, which allows significance to be ascertained using the matrix approach. This scoring of magnitude is obtained through results of quantitative modelling as well as factors such as the type of impact, duration and frequency of the activity, extent of acting alongside the timing and location of the activity.

*C.5.3 Underwater noise modelling*

We have reviewed the underwater noise modelling (Appendix 10.1), which includes a scenario assuming a 10 dB noise reduction due to primary noise reduction levels and its inclusion in the Marine Mammal Mitigation Protocol (MMMP). However, as outlined within the EIA Report

[22] https://pure.uhi.ac.uk/files/3083577/Nienke_Van_Geel_thesis.pdf



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(Paragraph 125), '*underwater noise modelling included an arbitrary scenario assuming a 10 dB noise reduction to represent the reduction in noise levels that could potentially be achieved were primary noise reduction methods, or secondary noise reduction systems, implemented during piling in the WDA*.'

This scenario was not used in our assessment of impacts for piling activities and therefore does factor into our conclusions. Although it is useful to see how a 10 dB reduction would alter the auditory injury impact ranges, the language used to describe the scenario (underlined above) with no additional detail on the feasibility at the development location or commitment to its inclusion, is not sufficient to allow us to consider this noise reduction at this stage.

Additionally, we note that concurrent piling has not been included as part of the PDE and therefore has not been assessed as an option within the EIA, RIAA or Report to Inform Marine Protected Areas Assessment. **Should this change and an option for concurrent piling be considered then we advise that a re-assessment will be required.**

*C.5.4 Underwater noise thresholds*

During pre-application consultation it was agreed that the Southall et al. (2019)[23] / NMFS (2018)[24] thresholds could be used for underwater noise modelling. We now advise that the updated 2024 thresholds should be used in assessments. However, we acknowledge that the underwater noise modelling was carried out prior to NatureScot adoption on use of the updated thresholds.

**As such:**

- **For all future and post-consent modelling that may be required for the proposal, we advise that the updated Southall et al. (2024) thresholds should be used.**

**C.6 NatureScot appraisal – EIA**

*C.6.1 Underwater noise during geophysical surveys*

It is noted in Section 10.12.1.3 of the EIA Report that geophysical surveys may be undertaken post-consent to inform project design work. Paragraphs 96 and 97 state that prior to any geophysical surveys, an EPA Risk Assessment will be undertaken to determine whether the proposed surveys are likely to cause disturbance or auditory injury to cetacean species. Final equipment selection will be confirmed during the EPS licence process that will be completed prior to any survey work commencing. As such, we are content with the overall conclusions, that the impact will be not significant in EIA terms.

*C.6.2 Underwater noise during UXO clearance*

The Unexploded Ordnance (UXO) clearance assessment for marine mammals is included within Appendix 10.6. Paragraph 8 states that any UXO clearance undertaken as part of the project will,

[23] Southall, B.L., Finneran, J.J., Reichmuth, C., Nachtigall, P.E., Ketten, D.R., Bowles, A.E., Ellison, W.T., Nowacek, D.P. and Tyack, P.L. (2019). Marine mammal noise exposure criteria: updated scientific recommendations for residual hearing effects. Aquatic Mammals, 45(2), pp.125-232.

[24] NMFS (National Marine Fisheries Service). (2018). 2018 Revisions to: Technical Guidance for Assessing the Effects of Anthropogenic Sound on Marine Mammal Hearing (Version 2.0): Underwater Thresholds for Onset of Permanent and Temporary Threshold Shifts. U.S. Dept. of Commer., NOAA.

by default, employ low-order clearance methods in line with current MD-LOT guidance (2025)[25]. However, as a precautionary approach, a worst-scenario assuming an accidental high-order clearance has also been assessed – we agree with both of these approaches.

Embedded mitigation has been proposed (Table 3.1, Appendix 10.6) comprising adherence to the MMMP, which contains outline measures to minimise the risk of injury to marine mammals. Exact mitigation measures for this activity can be agreed, if consented, as part of the UXO Marine Licence application, when more detailed information on the exact number and type of UXOs in the WDA is available.

Overall, we agree with the Applicant's conclusions, that the impact will be not significant in EIA terms.

*C.6.3 Auditory injury from underwater noise during piling*

It is noted in Section 10.12.1.5 that the underwater noise modelling was based on the following worst-case piling scenarios:

- 15 m diameter monopiles for WTG foundations using a maximum blow energy of 6,600 kJ.
- 4.5 m diameter pin-piles for WTG and OSP foundations installed with a maximum blow energy of 4,400 kJ.

Paragraph 132 states that the largest impact range for instantaneous Permanent Threshold Shift (PTS) for the largest hammer energy (6,600 kJ) is 980 m for Very High Frequency cetaceans. Based on the soft-start and ramp-up mitigation measures included within the modelling along with the addition of Acoustic Deterrence Device (ADD) use, we agree that this impact range is within a mitigatable distance. With the detail of any ADD use and its duration to be agreed at a later stage, if consented.

In relation to permanent threshold shift from exposure and disturbance during the entire construction period, Table 10.5 details the realistic WCS parameters and states that the maximum piling duration for monopiles is 32 days and for pin-piles is 82.3 days. However, in our review of the spatial scenario, we conclude that the worst-case spatial scenario is 149.3 days (installation of 144 monopiles and two OSPs) and the worst-case temporal scenario is 101.3 days (608 pin piles, with a maximum of six installed per day). As the duration of piling has an impact on the magnitude score and needs to be accounted for when looking at both the cumulative PTS and disturbance numbers, the under-estimation of piling days, especially in terms of monopiles (32 days versus 149.3 days) but also pin-piles (82.3 days versus 101.3 days) will underestimate these impacts.

We have accounted for this when looking at the conclusions for magnitude for both auditory injury from cumulative exposure and disturbance. Please see our advice within the iPCoD section below for more detailed information.

For the temporal scenario, the worst-case scenario has not been established, although installation of one pile per day has been modelled for auditory injury for cumulative exposure. We request that for disturbance the Applicant establishes that the worst-case scenario used in iPCoD

[25] https://www.gov.scot/publications/marine-licensing-unexploded-ordnance-clearance-guidance/pages/marine-licensing-requirements/



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modelling is indeed the worst-case scenario. Please see our advice within the iPCoD section below for more details.

We consider the worst-case scenario in terms of PTS from exposure for pin-pile installation to be six pin-piles installed within 24 hours, not installation of one pin-pile per 24-hour period. We note that both have been modelled within Appendix 10.1 and referred to within Chapter 10.

Sensitivity for all species to PTS from cumulative exposure to piling activities is scored high, which we agree with. The conclusion for magnitude for a single installation of a monopile or six sequential pin-piles at the maximum hammer energy is initially assessed as high for minke whale and medium for harbour porpoise, fin whale and humpback whale (Tables 10.24 and 10.25). For all other receptors, the magnitude is assessed as negligible. We agree with the scores assigned, which results in an **adverse significant effect for minke whale, harbour porpoise, fin whale and humpback whale in EIA terms.**

This conclusion is revised within Section 10.12.1.5.4 from major adverse effect (significant) to minor adverse effect (not significant) based on embedded mitigation measures (ADDs, MMOs, PAM operators) and that impulsive characteristics of piling activities change at distance from the noise source. We agree that major adverse significant effect is unlikely but as a precautionary approach and based on the evidence / justification provided within the EIA Report, we do not agree with the conclusion of minor significant adverse effect for minke whale, harbour porpoise. Fin whale and humpback whale.

Whilst we agree with the Applicant (Paragraph 157) that as piling noise propagates away from the source, the impulsive characteristics of the sound are reduced and therefore, the cumulative PTS ranges are precautionary. We highlight that this is an active area of research and no clear range has been established whereby the transition from impulsive to non-impulsive noise occurs. This transition is more likely to impact low frequency cetacean impact ranges (21 km and 27 km) than harbour porpoise (5.4 km and 8 km).

The Applicant has not included any detail on how embedded mitigation measures will reduce the number of animals at risk of cumulative PTS, and therefore the justification that embedded mitigation should reduce the conclusion of minor adverse effects has not been fully established.

**As such:**

- **This will need to be considered further by the Applicant in the development of the piling strategy and MMMP.**

As highlighted in our summary advice, with the current piling parameters and mitigation proposed, we advise there is still a risk of injury to marine mammals and an EPS licence for injury may be required.

*C.6.4 Disturbance and behavioural impacts from underwater noise during piling*

It states in Paragraph 165, Section 10.12.1.6 that '*to inform the assessment of this impact, a desk-based literature review has been undertaken to explore the potential for disturbance and to estimate indicative impact ranges from underwater noise generated during piling. Consequently, underwater noise modelling has not been used to predict impact ranges for behavioural effects*.' However, our understanding is that project-specific underwater noise modelling has been used to predict impact ranges for behaviour effects.

**As such:**

- **We request clarification from the Applicant that project-specific underwater noise modelling was used for the assessment of this impact.**

It has been useful to see the comparison between the Dose-Response Curve (DRC), Deterrent Distance-based function (harbour porpoise only) and the Effective Deterrent Range (EDR). However, we do not agree that conclusions should be based on the results from the EDR assessment. As discussed and agreed during pre-application consultation (meeting held 15th October 2025), the number of animals predicted to be disturbed from the DRC assessments should have formed the basis of the EIA conclusions.

It should also be noted that quantitative analysis results on bottlenose dolphin and killer whale should be interpreted with caution. The assessment is based on a small reference population over a large management area. Therefore, the number of animals (and resulting percentage of the reference population) predicted to be disturbed is unlikely to be accurate. This assessment would have benefited from a more qualitative approach, using resources such as photo ID catalogues.

We agree with the Applicants' scoring of sensitivity, which is medium for all species as well as the magnitude scores assigned, based on DRC, of high for harbour porpoise, white-beaked dolphin, grey seal and medium for white-sided dolphin, minke whale and harbour seal. As such, we conclude **major / moderate adverse significant effect for harbour porpoise, white-beaked dolphin, grey seal, white-sided dolphin, bottlenose dolphin, minke whale and harbour seal from disturbance from piling noise.**

Evidence from the West of Scotland and data collected from the Irish Sea (SCANS, ObSERVE[26]) indicate a potential decline in harbour porpoise numbers being recorded, it's unclear if this is due to redistribution or loss of the species. This uncertainty in harbour porpoise trends and the conclusion of major adverse significant effect from disturbance from piling activities is of concern.

In terms of potential mitigation measures, it states in Section 4.4.6, Appendix 9 (Draft MMMP) that the use of noise reduction methods (including Noise Abatement Systems (NAS)) and seasonal or spatial piling restrictions may be included in the final MMMP / Piling Noise Mitigation Strategy, but this will be confirmed post-consent. However, even if these measures are included, it has not been established how effective they may be in reducing the potential number of animals disturbed.

**As such:**

- **We request further information demonstrating how mitigation will reduce predicted effects and ensure disturbance from underwater noise during piling will be reduced.**

*C.6.5 Population modelling*

It is noted in Section 10.12.1.6.3.1 that population modelling has been undertaken using iPCoD to determine the population consequences of disturbance due to piling within the WDA. IPCoD has been undertaken for all receptors where parameters are available: harbour porpoise, bottlenose dolphin, minke whale, grey seal and harbour seal.

[26] https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publications/observe-programme/



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As iPCoD was run using disturbance numbers from EDRs and not the recommended DRC (Graham et al. (2017)[27] for cetaceans and Whyte et al. (2020)[28] for seals), **we require iPCoD modelling to be re-run for harbour porpoise, minke whale, grey seal and harbour seal using the DRC.**

We do not request the bottlenose dolphin Coastal West Scotland and Hebrides (CWSH; 45 individuals) or Oceanic Waters (OW; 1,299 individuals) populations to be re-modelled within iPCoD, as the results will likely inflate the potential impacts due to the small reference populations used within the model and the large MU areas.

Narrative on grey seal (Section 10.12.1.6.3.1.4) and harbour seal (Section 10.12.1.6.3.1.5) states that the worst-case scenario for disturbance is based on the DRC, which results in 4,548 grey seals and 1,049 harbour seals being disturbed. The EIA Report states that these DRC derived numbers have been used as an iPCoD parameter. However, this does not appear to be correct when cross-referencing with Appendix 10.1 (Underwater Noise Modelling Report) where the number of animals disturbed parameter is taken from EDRs (1,106 grey seals and 101 harbour seals).

**As such:**

- **Updated iPCoD modelling should be carried out using the DRC approach to calculate the number of animals disturbed for harbour porpoise, minke whale, grey seal and harbour seal.**

The worst-case spatial scenario modelled within iPCoD does not include the installation of OSPs. We would not request iPCoD re-modelling based on this factor alone, but as updated iPCoD modelling is requested above, we advise the updated modelling should include the additional days of disturbance for OSP installation if this scenario is confirmed as the WCS – see our advice on this below.

The worst-case temporal scenario has not been established for disturbance. Appendix 10.1 states that installation of six sequentially installed pin-piles will take 19 hours and 30 minutes (this does not appear to factor in vessel movements between piling locations or repositioning of equipment), additionally the potential for one pile to be installed in a 24-hour period has been included within the cumulative PTS assessment.

**As such:**

- **Clarification is requested on whether the worst-case temporal scenario would differ from the spatial scenario assessed for this impact. Should an alternative temporal scenario be recognised, we would like confirmation that the spatial scenario included within iPCoD modelling has a larger impact on the population trajectory of the five species modelled. It may be appropriate to model both the temporal and spatial worst-case scenarios.**

The reasoning for this is that the worst-case spatial scenario may have the largest number of individuals disturbed per day. However, less individuals disturbed per day (temporal scenario) but for a longer period of time, may have a larger impact on a population trajectory (which we have

[27] Graham, I.M., Farcas, A., Merchant, N.D. and Thompson, P. (2017). Beatrice Offshore windfarm: An interim estimate of the probability of porpoise displacement at different unweighted single-pulse sound exposure levels. Prepared by the University of Aberdeen for Beatrice Offshore Windfarm Ltd.

[28] Whyte, L., Hastie, G. D., & Thompson, D. (2020). Modelling the auditory effects of pile driving on seals: A case study Moray Firth. Environmental Impact Assessment 106428. https://doi.org/10.1016/j.eiar.2020.106428

seen in other projects). Therefore, without modelling both scenarios, we cannot assume the worst-case is the spatial scenario when assessing disturbance from piling activities.

We agree that individuals with the potential for cumulative PTS should be included within iPCoD modelling due to these impact ranges not being fully mitigated. However, the proposal has included un-mitigated levels in the modelling and due to the reasons outlined within the EIA Report whereby cumulative PTS are precautionary we request that the numbers inputted into the model are post-mitigation to allow a more realistic approach to be taken.

**As such:**

- **Post-mitigation PTS numbers should be included in the modelling for harbour porpoise, with detail of the mitigation applied to be agreed in advance.**
- **Clarification on the piling schedule that was used for the modelling should be provided.**

**As highlighted in our summary advice, with the current piling parameters and mitigation proposed, we advise an EPS licence for disturbance will be required. At present, we advise that there would be a detrimental impact on the maintenance of Favourable Conservation Status for harbour porpoise and potentially bottlenose dolphin.**

*C.6.6 Barrier effects due to underwater noise*

As highlighted in Section 10.12.1.9 underwater noise during construction has the potential to create a barrier effect, preventing movement or migration of marine mammals between important feeding and / or breeding areas, or potentially increasing foraging distances if animals avoid the area.

It is noted in Paragraph 323 that noise contours up to a level of 145 dB have been used to assess barrier effects referencing Graham et al. (2017). It is not clear why a 145 dB noise contour was deemed appropriate for the assessment of barrier effects as little justification has been provided.

Taking a precautionary approach and due to uncertainty over mitigation, we advise that the magnitude for minke whale, humpback whale and fin whale should be medium due to the potential migration route along the west coast of Scotland. This would result in a **moderate adverse significant effect for minke whale, humpback whale and fin whale from barrier effects due to underwater noise.**

**As such:**

- **Further justification is required for using noise contours up to 145 dB for assessing barrier impacts due to underwater noise.**

*C.6.7 Disturbance at protected seal haul-out sites*

It is noted in Section 10.12.1.11 that grey and harbour seal are known to be sensitive to anthropogenic activities at haul-out sites, particularly during vulnerable periods such as pupping and moulting. Any activity, including disturbance from vessel traffic and construction operations (including piling), may trigger behavioural responses of seals associated with seal-haul outs due to their dependency on surrounding waters.



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Section 117 of the Marine (Scotland) Act 2010 introduces the offence of intentionally or recklessly harassing a seal at a haul-out site. The information provided in the EIA Report does not appear to assess the above potential impacts.

The Applicant has used a Zone of Influence (~35 km) based on Russel et al. (2016), which presents disturbance from piling noise in relation to Sheringham Shoal Offshore Windfarm. It is unclear why project-specific underwater noise contours have not been visually presented to allow a better understanding of potential disturbance range and proximity to the protected seal haul-out sites.

Referring to Figures 10.4 and 10.5 the noise contours presented extend to the following four designated seal haul-out sites - Oronsay Strand, South Oronsay, Nave Island and Soa (Mull). These four designated seal haul-out sites (two designated for breeding) would be impacted intermittently over a 5-year construction period, we would advise the magnitude of impact to be medium not negligible.

The Applicants have assigned a sensitivity score of medium, this along with a revised magnitude score of medium results in a **moderate effect, which we advise is significant in EIA terms.**

**As such:**

- **We request further information on the potential underwater noise impacts to the following four seal haul-out sites - Oronsay Strand, South Oronsay, Nave Island and Soa (Mull).**

*C.6.8 Changes to prey availability*

Indirect effects assessed for this potential impact include those resulting from increased suspended sediment concentrations and redistribution, temporary habitat loss and disturbance or the production of underwater noise that may alter the behaviour or availability of prey species. We have reviewed the assessment provided in Section 10.12.1.12 and note the Applicant has concluded impacts are negligible or minor, which is not significant in EIA terms. However, in relation to potential impacts from underwater noise to prey species during construction, **we require further information on potential impacts to sandeel (see our advice in Appendix E) before we are able to agree with the Applicants' conclusions.**

*C.6.9 Underwater noise from operating WTG*

It is noted in Section 10.12.1.13 that current available data indicates that there is no lasting disturbance or exclusion of harbour porpoise or seals around windfarm sites during operation. We note that the references cited range from 2005-2012. Due to the larger turbines now being considered compared to the available research outputs, as well as the lack of current offshore wind farms on the west coast of Scotland, **we advise that monitoring of operational noise to validate EIA conclusions and better understand potential barrier impacts due to underwater noise from larger operational WTGs is undertaken if consented.**

*C.6.10 All other impact pathways*

For all other impact pathways, we agree with the conclusions in the EIA Report that there will not be any significant effects for any species.

**C.7 Cumulative effects**

*C.7.1 Auditory injury and behavioural impacts from underwater noise*

This potential cumulative impact is assessed in Section 10.13.3.1 of the EIA Report. As a result of the large MU and with other projects / proposals spanning different territorial waters, the cumulative assessment has been challenging to follow. For example, the CEA criteria / methodology for screening projects to assess disturbance from piling activities does not seem to align with the final list of projects screened in for assessment.

As the proposal alone assessment has concluded disturbance from underwater noise during piling is significant in EIA terms for harbour porpoise, white-beaked dolphin, white-sided dolphin, bottlenose dolphin, minke whale, grey seal and harbour seal, along with limitations of the CEA methodology and assessment as outlined above, we conclude this impact is also **significant cumulatively for the above species**. Additionally, by taking a precautionary approach following the criteria set out within the EIA Report, we conclude that **disturbance from piling activities for common dolphin (5.2% CGNS MU) and Risso's dolphin (5.1% CGNS MU) using EDRs and relevant density estimates are also significant cumulatively in EIA terms.**

We advise that the CEA can be revised when further discussion and consideration has been given to reducing the potential number of animals disturbed through agreed mitigation.

### C.8 Mitigation

Embedded mitigation measures for marine mammals are detailed in Section 10.10 of the EIA Report and we have provided some advice in our appraisal of impacts above as well as in Section C.5.2.

A draft MMMP has been provided in Appendix 9 and indicates the potential use of noise reduction methods, including NAS, seasonal or spatial piling restrictions. However, even if these measures are included, it has not been established how effective they may be in reducing the potential number of animals disturbed. Furthermore, we advise assessments should not rely on embedded mitigation without a firm commitment to the measure(s).

### C.9 Monitoring

No monitoring has been proposed in relation to marine mammal interests. Considering the high density and diversity of marine mammals impacted by the proposal and significance of predicted impacts, as well as there being fewer offshore windfarms on the Scottish west coast it is likely we will request further monitoring if consented.

### C.10 Transboundary and cross-border impacts

The Applicant acknowledges in Section 10.14 that due to the highly mobile nature of marine mammals there will be the potential for transboundary effects.

Given the extent of this ZoI and potential transboundary impacts in Irish waters, further advice should be sought from An Bord Pleanála and/or National Parks and Wildlife Service, as appropriate.

Advice should also be sought from the Department of Agriculture, Environment and Rural Affairs (DAERA) in relation to potential cross-border impacts in Northern Irish waters.

### C.11 NatureScot appraisal – RIAA



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The RIAA draws on the HRA Screening Report submitted with the EIA Report. The European sites and qualifying species screened for likely significant effect (LSE) are detailed in Table 6.5 of the HRA Screening Report and include:

- Harbour porpoise of the Inner Hebrides and the Minches SAC (0.4 km)
- Grey seal of the Treshnish Isles SAC (40 km)
- Harbour seal of the South-East Islay Skerries SAC (66.5 km)
- Harbour porpoise of the Skerries and Causeway SAC (Northern Ireland, 68 km)
- Harbour seal of the Eileanan agus Sgeiran Lios mor SAC (77 km)
- Harbour seal of the Sound of Barra SAC (100 km)
- Harbour seal of the Ascrib, Isay and Dunvegan SAC (175 km)

When assessing potential impacts on marine mammal SACs, we advise that Applicants consider whether there is any connectivity between the proposal and each of the qualifying interests i.e. are there processes or pathways by which the proposal may influence the site's qualifying species directly or indirectly.

If a proposal is capable of affecting a European site it must be considered, no matter how distant. However, if there is no connection or it is obvious that the proposal will not undermine the Conservation Objectives despite a connection, no likely significant effect (LSE) can be concluded.

Therefore, we advise that due to a lack of connectivity between the proposal and qualifying species, there is no LSE to:

- harbour seal of the Sound of Barra SAC:
- harbour seal of the Eileanan agus Sgeiran Lios mor SAC; or
- harbour seal of the Ascrib, Islay and Dunvegan SAC.

We have not assessed the impacts of the proposal on the Skerries and Causeway SAC (Northern Ireland) as this is outside of Scottish jurisdiction, and advice should be sought from DAERA for this protected site.

We are content that:

- harbour porpoise of the Inner Hebrides and the Minches SAC;
- grey seal of the Treshnish Isles SAC; and
- harbour seal of the South-East Islay Skerries SAC

have been taken forward for further assessment in the RIAA and for which we provide our below.

*C.11.1 Inner Hebrides and the Minches SAC – harbour porpoise*

The Inner Hebrides and the Minches SAC lies immediately adjacent to the WDA, with the closest point being less than 400 m away. It is noted in Section 6.1.3 (RIAA, Part 2) that there is no documented density estimate or reference population for harbour porpoise within the SAC. The, the highest seasonal density recorded in the DAS of 0.42 individuals per $km^2$ has been used for the assessment, which we are content with.



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We note in Section 6.1.5 that the criteria from JNCC et al. (2020)[29] has been used for the assessment of impacts to harbour porpoise of the Inner Hebrides and the Minches SAC, however this guidance is not applicable for consideration of SACs in Scottish waters. Impacts should be assessed using site-specific Conservation Objectives and Conservation and Management Advice available for sites in Scotland.

**As such:**

- **We advise that the impacts should be re-assessed using the Conservation Objectives and Conservation and Management Advice, which can be found on SiteLink**[30].

We also advise there is inconsistency within the assessment of impacts, with some assessments using the MU as the reference population whilst others use the SAC as the reference population. The reasoning behind this is not clear and **we request clarification for each impact as to why either the MU or SAC has been selected as the reference population.**

In relation to the underwater noise assessments for the RIAA generally, we note that the mapping of any overlap of sound emissions with the SACs has not been made apparent. Therefore, **we require that where we have requested additional information, this includes modelled noise contours on a map, which includes the SAC boundaries to enable our assessment of the potential ensonification of the SAC, where relevant.**

*C.11.1.1 Underwater noise during geophysical surveys*

We are content that with the application of appropriate mitigation, there will be no AEoSI as a result of auditory injury from underwater noise during geophysical surveys.

However, we do not agree with the conclusion of no AEoSI from disturbance associated with underwater noise during geophysical surveys. The worst-case scenario for disturbance is presented using an EDR of 5 km (JNCC et al., 2020), for three geophysical vessels operating simultaneously. The maximum number of harbour porpoise that could be disturbed is presented as 99 individuals - no temporal estimation has been included. If 99 porpoises are disturbed per day of a multi-day survey, the projected total number of animals amounts to a significant portion of the West Scotland MU. For example, the geophysical campaign conducted in 2025 amounted to 88 days, and if this was used to calculate a worst-case scenario for three vessels, up to 35.8 % of the MU population could be affected. Due to the close proximity of the WDA to the SAC (<400 m), it is likely that underwater noise would overlap with the SAC boundary at certain locations. However, it is unclear to what extent.

**As such:**

- **We require additional information on the temporal scale of the geophysical surveys in order to advise on potential effects to site integrity.**

*C.11.1.2 Disturbance and behavioural impacts from underwater noise during piling*

As advised in Section C.6.5 of our advice for the EIA appraisal above, three methods have been used to assess disturbance - EDR, DRC and deterrence-based function, with the population

[29] JNCC (2020). Guidance on noise management in harbour porpoise Special Areas of Conservation (SACs). JNCC Report No. 654. JNCC, Peterborough.
[30] https://sitelink.nature.scot/home


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modelling (iPCoD) using disturbance numbers from EDRs rather than the recommended DRC. We consider that the DRC is the worst-case scenario and this is what should have been assessed.

Despite not using the worst-case scenario (DRC), the assessment indicates (Paragraph 102) that up to 47.6 % of the West Scotland MU could be disturbed from unmitigated monopile piling. The Applicant has not provided an estimation of the impact to the SAC.

The implementation of mitigation, including NAS may reduce impacts, although this scenario has also not been provided in the RIAA.

Despite these omissions, and using the Applicant's approach, we advise the extent of predicted impacts as a result of disturbance from underwater noise during piling are such that **we can conclude that there is an AEoSI on harbour porpoise of the Inner Hebrides and Minches SAC**. In order to ascertain the extent of the potential impacts, we require:

- **Updated iPCoD modelling using the DRC approach to calculate the number of harbour porpoise disturbed by underwater noise from piling.**

*C.11.1.3 Changes to prey availability*

It is noted in Section 6.1.5.9 that harbour porpoises within the Inner Hebrides and Minches SAC rely on a varied prey base that changes seasonally and geographically. Their diet typically includes small pelagic fish such as sprat and herring, alongside sandeels, cephalopods and shellfish.

Indirect effects assessed for this potential impact include those resulting from increased suspended sediment concentrations and redistribution, temporary habitat loss and disturbance or the production of underwater noise that may alter the behaviour or availability of prey species.

In relation to changes to prey availability, **we require further information on potential impacts to sandeel (see our advice in Appendix E) before we are able to reach a conclusion on AEoSI.**

*C.11.1.4 Disturbance from ADDs*

We do not recommend using EDRs for ADD assessment, instead we expect the Applicant to assess the area of disturbance based on propagation modelling for ADDs alongside harbour porpoise density. Visual representation of the spatial footprint of ADD noise outputs as noise contours (120 dB and 140 dB) would also enable better consideration of the potential impact to the SAC. Therefore, we advise that **further information is required on the spatial overlap of ADD noise contours within the SAC in order to assess potential impacts from ADD disturbance.**

*C.11.1.5 Auditory injury and behavioural impacts from noise associated with non-piling activities*

Section 6.1.5.5 notes that the rock placement has the highest impact range of all non-piling activities, with the worse-case scenario presented for disturbance being the same as that for vessel presence (4 km disturbance buffer around the WDA), with up to 22 animals for one non-piling activity, and 358 animals if multiple non-piling activities occurred concurrently (117 vessels).

We agree there is a low likelihood of noisy non-piling construction being conducted by 117 vessels concurrently, although it would have been helpful for our assessment to have an indication of the likely concurrent non-piling works, as well as the expected temporal scale of works.


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However, we disagree with the 4 km buffer approach applied, in light of TTS ranges for some activities (e.g., rock placement / dredging) being greater than this distance.

**As such:**

- **We request further information on non-piling disturbance in order assess the impact on site integrity. We advise that this information should include a visual representation in the form of noise contours which show the overlap with the SAC.**

*C.11.1.6 Auditory injury and behavioural response from vessel noise*

Having reviewed Section 6.1.5.6, we advise that we are content there is a low risk of TTS and auditory injury from vessels. There is risk of disturbance to harbour porpoise, which has been estimated within the WDA from vessels transiting from Stornoway (WCS for length of transit within the SAC). While numbers of porpoise disturbed are high (928 animals during the Stornoway transit), the proportion of the SAC population impacted is not significant as the impacts are temporary and can be further reduced by following the Scottish Marine Wildlife Watching Code (SMWWC). Based on this we can conclude no AEoSI, however, we advise that further actions should be included within the Vessel Management Plan (VMP). We request the Applicant includes vessel management options that allow for a reduction in Dynamic Positioning (DP) and engine idling within the SAC. We also require that the numbers of vessels using ultrasonic anti-fouling devices are identified by the Applicant and included in the VMP, with our preference for these systems not to be used, where possible.

*C.11.1.7 Barrier effects due to underwater noise*

Section 6.1.5.7 notes for species that rely on acoustic cues for orientation or prey detection such as harbour porpoise, persistent noise may lead to avoidance of noisy areas, fragmenting habitats and restricting access to critical feeding or migratory routes.

Paragraph 160 states that the Applicant has used a 145 dB contour to represent an outer boundary of behavioural response. It is unclear how or where this cut-off has been derived.

NatureScot has seen the presentation of modelling using a precautionary 140 dB cut-off for other developments and the case for using this figure has required justification. The visualisation of the chosen noise contour in the EIA Report (Figure 10.4) has not been included in the RIAA, and as such, it is challenging to understand the potential overlap with the SAC. The close proximity of the proposal to the SAC (<400 m) necessitates further consideration as the modelled outputs indicate all piling locations result in a barrier effect within the SAC.

**As such:**

- **We require the area and percentage of the SAC using this approach of a noise contour at 140 dB to be presented on a map in order to help us identify and advise on whether the Conservation Objectives are likely to be undermined.**

*C.11.1.8 Vessel Interaction (collision risk)*

In relation to this potential impact, with the mitigation outlined in Appendix 6 (Outline EMP), we are content there will be no AEoSI. However, we do highlight that smaller, faster vessels such as those of crew transfer and support boats pose a risk to harbour porpoise and the <10 knot speed limit should also apply to these vessels as speed restrictions have been shown to directly reduce


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the likelihood of collisions with marine mammals. In addition, we recommend the Applicant commits to reporting collisions across all vessel types to the International Whaling Commission Vessel Strike database[31], and to NatureScot, if consented.

*C.11.1.9 All other impact pathways*

For all other impact pathways, we are content that there will be no AEoSI to harbour porpoise of the Inner Hebrides and Minches SAC.

*C.11.2 Treshnish Isles SAC- grey seal*

The Treshnish Isles SAC is located approximately 40 km north of the WDA at its closest point. As noted in Section 6.2, although the SAC lies more than 20 km from the WDA, telemetry and foraging studies indicate that grey seals associated with this SAC range widely at sea, with potential connectivity due to foraging activity.

The assessment uses density estimates from Carter et al. (2025) of 0.007 seals per $km^2$, rather than the absolute density derived from the EIA Report, which also references Carter et al. (2025) (0.88 seals/ $km^2$). It is not clear why the Applicant has presented different density figures. Our advice below is based on the estimated number of individuals affected for each impact using the EIA Report density figure of 0.88 seals / $km^2$.

*C.11.2.1 Underwater noise during geophysical surveys*

We agree there will be no AEoSI as a result of auditory injury from underwater noise during geophysical surveys.

In relation to disturbance from underwater noise during geophysical surveys, when the correct density figure is used (0.88 seals/$km^2$), the potential impact from disturbance is much greater than that presented in the assessment:

- 1 vessel = 69.11 seals (10.8 % of SAC population)
- 2 vessels = 138.2 seals (21.7 % of SAC population)
- 3 vessels = 207.3 seals (32.6 % of SAC population)

Carter et al. (2022) indicates that there is connectivity between the Treshnish Isles SAC and the WDA, which may be indicative of the site's foraging value. However, we recognise that there are several assumptions and levels of precaution within the estimates. While we expect that there would not be disturbance within the SAC from geophysical surveys due to the rapid attenuation of high-frequency signals, the numbers of seals disturbed that may be associated with the SAC are high.

**As such:**

- **We require additional information on the temporal scale of the geophysical surveys in order to advise on potential effects to site integrity.**

*C.11.2.2 Auditory injury and disturbance from underwater noise during piling*

[31] https://iwc.int/management-and-conservation/vessel-strikes



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In our review of Section 6.2.3.3 and noting the small ranges associated with auditory injury (our assessment used 0.88 seals / $km^2$), we are content that there will be no AEoSI from underwater noise during piling.

As highlighted previously in our advice, we acknowledge the inclusion of several methods to assess disturbance from piling; EDR, DRC and Deterrent Distance-based function. It notes in Section 6.2.3.4 that the DRC result from iPCoD has been used in this assessment. However, the iPCoD modelling report (Appendix 10.4) states that all receptors have been modelled using EDR. As highlighted above for harbour porpoise and the EIA appraisal, this is not the advised approach.

The assessment of disturbance uses 20 km and 11 km (with mitigation) EDRs to reach conclusions. Table 10.35 in the EIA Report states that 4,548 grey seals would be disturbed by piling without mitigation using the DRC, which would be greater than the entire SAC population and amounts to 26 % of the West Scotland MU. While we accept it is unlikely the entire SAC population would be present in the area at any one time and the predicted disturbance would more likely affect a mixture of individual grey / harbour seals from other SACs, designated haul-outs and non-designated sites, there is still potential for a significant number of seals to be disturbed, some of which will be part of the Treshnish Isles SAC population.

Table 6.38 in the RIAA presents a single piling event scenario only and does not account for the full temporal scale of piling over the proposed 144 days. The resulting iPCoD model (Table 6.39) finds no differences between the impacted / non-impacted SAC population at any stage, due to the EDR numbers being used.

**As such:**

- **Updated iPCoD modelling should be carried out using the DRC approach to calculate the number of grey seal disturbed. A visual presentation in the form of noise contours which show the overlap of underwater noise with the SAC to enable us to reach final conclusions on AEoSI should also be provided.**

*ADDs*

Disturbance from use of ADDs is presented in Section 6.2.3.4.1.4. Using the EDRs presented in the assessment alongside the correct density shows 334 individuals (11 km EDR) would be disturbed without mitigation and 177 individuals (8 km EDR) would be disturbed using mitigation (10 dB noise reduction).

We do not recommend using EDRs for ADD assessments and instead advise that the Applicant assesses the area of disturbance based on propagation modelling for ADDs alongside seal density. Visualising the spatial footprint of ADD noise outputs as noise contours (120 dB, 140 dB) would also enable a better understanding of the potential impact to the SAC.

**As such:**

- **Propagation modelling for ADDs is required using the correct seal density (0.88 / $km^2$) as well as a visual presentation in the form of noise contours which show the overlap of ADD noise outputs with the SAC to enable us to reach final conclusions on AEoSI.**

*C.11.2.3 Changes to prey availability*



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We advise that the assessment of this impact (Section 6.2.3.9) is insufficient and does not adequately account for the high seal densities observed in the WDA, which suggests that the site may represent an important foraging ground for seals, particularly in the summer months.

Paragraph 401 states that seals may be able to switch to alternative prey types when preferred species become less abundant. However, the mention of harbour seal / porpoise depredation fails to mention that this behaviour may be attributed to a lack of other suitable fish prey, or competition for prey resources (intra-guild predation). This section does not contain the information or justification to enable to us conclude that seals from the SAC may be not adversely affected by the loss of prey species, particularly during construction. As noted above in our EIA advice, **we require further information on potential impacts to sandeel (see our advice in Appendix E) before we are able to provide definitive advice on impacts to grey seal of the Treshnish Isles SAC.**

*C.11.2.4 Barrier effects due to underwater noise*

Having reviewed Section 6.2.3.7, we advise that **further information on barrier effects due to underwater noise is required for us to reach a conclusion on site integrity**. As per our advice for the Inner Hebrides and Minches SAC, this should include mapped noise contours to allow for a better understanding of the potential ensonification relative to the SAC.

*C.11.2.5 Disturbance to seal-haul-out sites*

There are no designated seal haul-outs within the SAC. However, seals that use the nearby haul-outs may be associated with the SAC. As the assessment has not included any spatial detail on the propagation of underwater noise from piling / UXO, which may disturb seals from haul-outs we are unable to reach a conclusion on site integrity. As such, **we request further information on the spatial impacts of noise and the overlap with designated seal haul-out sites before we are able to reach a conclusion on site integrity.**

Further assessment of impacts to seal haul-outs can be found in our comments in Section C.6.7.

*C.11.2.6 All other impact pathways*

For all other impact pathways, we are content that there will be no AEoSI to grey seal of the Treshnish Isles SAC.

*C.11.3 South-East Islay Skerries SAC - harbour seal*

The South-East Islay Skerries SAC is located approximately 66.5 km from the WDA at its closest point. Section 6.3 notes that although the SAC is located over 50 km from the SAC, harbour seals in the West Scotland MU often travel over 100 km from haul-out sites. Therefore, the Applicant concludes that there is likely to be connectivity with the WDA, which we agree with.

It is noted that a harbour seal density of 0.0017 seals per $km^2$ has been used for the assessment. However, we advise that this does not reflect the harbour seal density used in the EIA (0.08 seals / $km^2$). As advised with respect to grey seal of Treshnish Isles SAC, this will impact the conclusions of some of the impacts.

Harbour seals are more site faithful all year round so for the proposal alone we can conclude no AEoSI for the following impacts due to limited overlap with the SAC, and low numbers of potentially impacted seals when the numbers are re-calculated with the appropriate density:


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- Geophysical surveys (injury and disturbance)
- UXO (injury and disturbance). Noting that TTS ranges are far smaller than EDR. High order has permanent injury distances that are not mitigatable and this will need re-assessed if surveys reveal the need for high order clearance.
- Piling (injury)
- ADDs (disturbance)
- Non-piling (injury/disturbance)
- Vessel – underwater noise (injury)
- Vessel - collision
- Operating WTG – underwater noise

*C.11.3.1 Disturbance and behavioural impacts from underwater noise during piling*

As highlighted previously in our advice, EDRs have been used to form conclusions on disturbance impacts from underwater noise, which we do not advise. Therefore, we require disturbance to be re-assessed using DRC and the correct seal density, alongside iPCoD. Presentation of the overlap of the noise contours alongside the location of the SAC is also required.

Using the EDRs presented and the correct seal density, disturbance results in:

- 100.5 harbour seals disturbed from unmitigated monopiles (10.2 % of the SAC population)
- 30.4 harbour seals disturbed from mitigated monopiles (3.09 % of the SAC population)

**To enable us to reach a final conclusion on AEoSI, updated iPCoD modelling should be carried out using the DRC approach to calculate the number of harbour seals disturbed. A visual presentation in the form of noise contours which show the overlap of underwater noise with the SAC should also be provided.**

*C.11.3.2 Barrier effects due to underwater noise*

Having reviewed Section 6.3.3.7, we advise that **further information on barrier effects due to underwater noise is required to enable us to reach a conclusion on site integrity**. As per our advice for the Inner Hebrides and Minches SAC and Treshnish Isles SAC, this should include mapped noise contours to allow for a better understanding of the potential ensonification relative to the SAC.

*C.11.3.3 All other impact pathways*

For all other impact pathways, we are content that there will be no AEoSI to harbour seal of the South-East Skerries SAC.

**C.12 Report to Inform Marine Protected Area Assessment**

*C.12.1 Sea of the Hebrides NCMPA - Minke whale*

The Sea of the Hebrides NCMPA is located 4.3 km to the north of the proposal and includes minke whale as one of its protected features. There is evidence to suggest the NCMPA encompasses a seasonal occurrence of minke whales to the west coast of Scotland. Minke whales seem to move into the NCMPA from the southwest, with the highest densities around the Small Isles. Minke are primarily feeding on forage fish and mackerel and will be vulnerable to disturbance. Changes to foraging patterns / opportunities from vessels or underwater noise may result in a reduced energy store which could impact survival through the winter months, or their ability to breed.


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Given the proximity to the NCMPA, agreement was reached during pre-application engagement that the Applicant would screen in minke whale for further assessment. For the purposes of the NCMPA assessments minke whales are only protected when they are in the site and as such the assessment should consider any activities that take place within or outside of the NCMPA that could potentially kill or injury minke whales in the NCMPA, as well as any activity that has the potential to reduce access to resources or cause disturbance of minke whales in the NCMPA[32].

Table 2.2 sets out the impact pathways screened in for further assessment, which we agree with.

We note that the assessment has used an animal abundance estimate derived from multiple SCANS-IV survey blocks (CS-H, CS-F, CS-I, CS-J) to form a 'West Scotland' population (2,458 animals). The assessment has also only used Block CS-H (209 animals) and Block CS-F & H (702) as to account for uncertainty, which we are content with. However, in relation to density estimates, we do not agree with the density figure used in the Report to Inform Marine Protected Areas Assessment, which is considerably less than the density used in the EIA (0.03 animals / $km^2$ vs 0.21 animals / $km^2$).

As such, **we require re-assessment of impacts to the NCMPA using the appropriate density of minke whale (0.21 / $km^2$). We also require the Applicant to assess the overlap of the estimated area of impact with the NCMPA using the recommended DRC (120 dB), which is relevant for assessing all impacts relating to disturbance from underwater noise.**

**We recommend this information be displayed visually with noise contours overlayed with designated site boundaries.** Since this information is not available in the report for these sections and there are extensive recalculations required using DRC and the correct density, we are unable to provide a conclusion.

*C.12.1.1 Underwater noise during geophysical surveys*

We are content in relation to auditory injury from underwater noise impacts during geophysical surveys that there is no significant risk of hindering the achievement of Conservation Objectives of the site.

Regarding the assessment of disturbance from underwater noise impacts during geophysical surveys. We note that the noise overlap for the NCMPA has been presented as <1 % of the MPA area, using a 5 km EDR as requested by NatureScot. However, when the appropriate density is used to calculate the number of disturbed animals (see Table C1 below), we note that no temporal estimate has been made in the assessment, which leads to several scenarios where multiple days of survey could lead to significant disturbance of minke whale over time. As a result, **we advise there is significant risk of hindering the achievement of the Conservation Objectives for minke whale of the NCMPA.**

*Table C1. Numbers of minke whales affected by geophysical surveys (presumed on one day) using 0.03 whales per km (MPA report) and 0.21 whales per km (NS recalculation).*

| Survey | # animals (MPA report/*NS recalculation*) | % 'West Scotland' (MPA | % CS-H & CS-F (MPA | % CS-H only (MPA report/*NS recalculation*) |
|---|---|---|---|---|

[32] https://www.nature.scot/sites/default/files/nature-conservation-mpa/10474/conservation-and-management-advice.pdf



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| | | report/*NS recalculation*) | report/*NS recalculation*) | |
|---|---|---|---|---|
| 1 vessel | 3 / *16.5* | 0.4 / *0.6* | 0.4 / *2.3* | 1.4 / *7.8* |
| 2 vessels | 6 / *32.9* | 0.24 / *1.3* | 0.85 / *4.5* | 2.8 / *15.3* |
| 3 vessels | 9 / *49.5* | 0.36 / *2.01* | 1.2 / *7.05* | 4.3 / *20.3* |

*C.12.1.2 Vessel collision and disturbance*

To enable us to provide advice in relation to disturbance from vessel movements, **we require the maximum number of individuals to be re-calculated for the various 'population' sizes using a density of 0.21 animals km$^{-1}$.**

In relation to collision risk, the assessment does not attempt to quantify existing vessel movements within the NCMPA, and the projected increased vessel movements if Kishorn, Bendoran or Arnish / Stornoway ports are used which would result vessels transiting through the MPA. We note that 5,699 vessel round trips are predicted during a five-year construction phase, but there is no information provided to estimate how much of an increase from baseline shipping activity this represents. **We request additional information to assess the potential impacts of any increase in vessel traffic in this NCMPA**.

*C.12.1.3 ADDs*

Recalculation of minke whales potentially disturbed by ADD use for 15 mins (using an 11 km EDR) results in:

- 79.82 individuals disturbed
- 3.2 % of 'West Scotland' population
- 11.3 % of CS-F & CS-H population
- 38.19 % of CS-H only

**We require that the modelled propagation of the ADD is presented alongside noise contours that may result in disturbance.** If consented, this information, along with the correct density of minke whales, will be required for us to advise on the risk of hindering the Conservation Objectives and to inform the use of ADDs in the MMMP**.**

*C.12.1.4 Barrier effects due to underwater noise*

The Applicant has failed to identify the seasonal movements of minke whales into the NCMPA from the southwest, which presents a significant possibility of barrier effects, especially during activities such as pile driving, geophysical surveys and to some extent pre-construction activities such as seabed preparation / cable route preparation.

In addition, the underwater noise output of the operational array has not been assessed in this report in relation to the NCMPA.

**We advise that additional assessment is required for us to advise on this impact pathway and whether it could impact on the Conservation Objectives.** This should include underwater noise impacts displayed spatially, using DRC and identifying the correct noise contour, with a particular emphasis on the seasonal consideration of moments to this MPA.

*C.12.1.5 Disturbance and behavioural impacts from underwater noise during piling*



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As highlighted previously in our advice, **we require re-assessment of disturbance from underwater noise using the appropriate density of minke whale (0.21 / km$^2$). We also require the Applicant to assess the overlap of the estimated area of impact with the NCMPA using the recommended DRC (120 dB).** This information is required before we are able to advise on the risk of hindering the achievement of Conservation Objectives for minke whale of the NCMPA.



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**NATURESCOT ADVICE ON MACHAIRWIND OFFSHORE WINDFARM**

**Appendix D – Offshore ornithology**

Offshore ornithological interests for MachairWind are considered in Chapter 11 (Volume 2) and the following relevant supporting appendices:

- Volume 3c – Technical Appendices and associated Annexes 11.1 – 11.7
- Report to Inform Appropriate Assessment (RIAA) – Parts 1 and 3
- RIAA – WDA HRA Screening Report
- RIAA – Without Prejudice Derogation Case
- RIAA – Appendix 1 – Without Prejudice Guillemot Compensation Plan

**D.1 RIAA summary**

*D.1.1 Proposal alone assessment*

The Applicant concludes no AEoSI from the proposal alone or in-combination. We disagree and conclude **AEoSI from the proposal alone** for:

- **Guillemot at North Colonsay and Western Cliffs SPA.**

*D.1.2 In-combination assessment*

We also conclude that there will be **AEoSI in-combination** with other offshore wind farms for:

- **Kittiwake at Ailsa Craig SPA.**

**D.2 EIA summary**

*D.2.1 Proposal alone assessment*

The Applicant has concluded no significant effects from the proposal alone. We disagree and conclude there will be a **significant effect from the proposal alone** for:

- **Guillemot from displacement.**

*D.2.2 Cumulative assessment*

We also conclude that there will be a **significant effect from this proposal cumulatively** with other offshore wind farms for:

- **Kittiwake from collision and displacement.**

**D.3 Baseline characterisation**

The baseline characterisation is summarised within Section 11.8 of the EIA Report, with full details provided in Appendix 11.2.

*D.3.1 Digital Aerial Surveys (DAS)*

The Applicant undertook monthly DAS between March 2021 and September 2023, recording 30 months of data. The area covered by the DAS was larger than the WDA plus 4 km buffer to account for edge effects.



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The HPAI outbreak began in summer 2021 and high mortalities were recorded through to 2023. However, we note that the baseline surveys for this proposal recorded higher numbers of birds in the 2022 breeding season than in 2021 for most species (Table 10, Appendix 11.2).

As the June survey was not undertaken in 2022, the 2022 breeding season was not used for calculating Mean Seasonal Peak (MSP). Therefore, the breeding season MSP was based on 2021 and 2023 data. An additional three months of third-party DAS samples were selected to inform the baseline, giving 27 DAS samples for baseline characterisation – this was agreed in pre-application correspondence (letter sent 07 August 2025).

*D.3.2 Availability bias*

Availability bias was based on Thaxter et al. (2013)[33] for guillemot and razorbill, and Spencer (2012)[34] for puffin. These data have since been superseded by Dunn et al. (2024)[35], however as the former references were guidance at the time of scoping, and would not affect our conclusions for these species, we are content to accept it.

*D.3.3 Deceased birds*

It is noted that a small number of deceased birds were recorded during the DAS survey. These have not been included in the calculation of the density and abundance estimates, which is the correct approach.

*D.3.4 Colony counts*

Annex 11.2M notes that SPA population sizes were either taken from Seabirds Count (2015-2021, Burnell et al., 2023), or from the Seabird Monitoring Programme (SMP) database if more recent counts were available – we are content with this approach. We also note that razorbill at Ailsa Craig were not included in the breeding population estimate. However, we are content that this would not affect our conclusions.

**D.4 Assessment approach**

The EIA Report and RIAA provide sufficient detail on which to base the assessment. The supporting appendices and associated annexes provided to support the EIA and RIAA are of good quality, transparent and consistent in content and presentation, and have enabled us to review the assessment with confidence and subsequently provide our advice.

In reviewing the assessment approach in Chapter 11, supporting Technical Appendices, Annexes and RIAA, we have set out advice where it relates to specific clarification or additional information requirements.

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[33] Thaxter C.B., Daunt, F., Grémillet, D., Harris M. P., Benvenuti, S., Watanuki, Y., Hamer, K.C. Wanless, W. (2013) Modelling the Effects of Prey Size and Distribution on Prey Capture Rates of Two Sympatric Marine Predators. PLoS ONE 8(11): e79915. Available at: <https://doi.org/10.1371/journal.pone.0079915>.

[34] Spencer, S M. (2012). Diving Behavior and Identification of Sex of Breeding Atlantic Puffins (*Fratercula arctica*), and Nest-Site Characteristics of Alcids on Petit Manan Island, Maine. University of Massachusetts Amherst.

[35] Dunn, R. E., Duckworth, J., O'Brien, S., Furness, R. W., Buckingham, L., Daunt, F., Bogdanova, M., & Green, J. A. (2024). Temporal and spatial variability in availability bias has consequences for marine bird abundance estimates during the non-breeding season. Ecological Solutions and Evidence, 5, e12373. https://doi.org/10.1002/2688-8319.12373

*D.4.1 Displacement*

The displacement report (Appendix 11.4) provides information on the assessment of distributional responses. The matrix approach (as per NatureScot guidance) was used to quantitatively assess the impact of disturbance / displacement effects, as agreed during pre-application engagement (email sent 18 December 2025). We agree with the species assessed for displacement, which includes:

- Great northern diver, kittiwake, common tern, Arctic tern, guillemot, razorbill, puffin, fulmar and gannet.

As great northern diver are considered less sensitive to disturbance than red-throated diver during the non-breeding season, a displacement rate of 50 % to 80 % and a mortality rate of 5 % was applied – we are content to accept this.

Seasonal definitions presented both our NatureScot Guidance Note 9[36] and the BDMPS seasons, we are content with the assessment and advise mean seasonal peaks were calculated correctly. Displacement and mortality rates are as advised in our Guidance Note 8[37].

The results are presented clearly and the calculations of mortality in the matrices are correct. The results of the displacement assessments are transferred correctly through to the EIA and the RIAA.

*D.4.2 Collision risk modelling (CRM)*

The Applicant has set out the approach taken to CRM in Appendix 11.3, which follows NatureScot guidance as laid out in Guidance Note 7[38]. The R version of the sCRM tool was used, which was agreed during pre-application engagement (email sent 18 December 2025) and both stochastic and deterministic analysis outputs have been presented. We support the methods used and outputs taken forward in the assessment as well as the species taken forward in the assessment, which includes:

- Kittiwake, great black-backed gull, herring gull, Arctic tern, common tern and gannet.

*D.4.3 Migratory CRM*

The approach taken for collision modelling of migratory species has been set out in Annex 11.3C (Greenland white-fronted goose) and 11.3D. CRM for migratory species has been undertaken using the Marine Directorate mCRM tool, which we support. All species with a migratory route that overlaps with the WDA have been included.

*D.4.4 Breeding season apportioning*

In relation to apportioning methodology, having reviewed Appendix 11.6 (Apportioning for HRA), we note that the Applicant has incorrectly re-screened sites when undertaking apportioning for

[36] NatureScot Guidance Note 9 – seasonal periods for birds in the Scottish Marine Environment: https://www.nature.scot/doc/guidance-note-9-guidance-support-offshore-wind-applications-seasonal-periods-birds-scottish-marine

[37] NatureScot Guidance Note 8 – assessing distributional responses, displacement and barrier effects of marine birds: https://www.nature.scot/doc/guidance-note-8-guidance-support-offshore-wind-applications-marine-ornithology-advice-assessing

[38] NatureScot Guidance Note 7 – assessing collision risk of marine birds: https://www.nature.scot/doc/guidance-note-7-guidance-support-offshore-wind-applications-marine-ornithology-advice-assessing

kittiwake, guillemot, razorbill and herring gull. For Stage 1 LSE screening, our advice is that connectivity is determined by measuring the closest edge of the SPA to the closest edge of the proposal. For apportioning, our advice is that the shortest 'at-sea' distance between the geometric centre of the proposal and the geometric centre of an SPA should be measured. By re-screening at the apportioning stage, the Applicants have incorrectly screened out kittiwake at Cape Wrath SPA, herring gull at Rathlin Island SPA, razorbill at Tory Island SPA and guillemot at Horn Head to Fanad Head SPA, Mingulay and Berneray SPA and Rum SPA when apportioning impacts. It is unlikely that this will impact our overall conclusions. However, we require the apportioning to be redone for the sites / species that were screened out to confirm impacts, this will also ensure that future in-combination assessments can be undertaken using the correct figures.

**As such:**

- **We require the Applicant to undertake re-apportioning to include the sites identified above to enable us to confirm the potential impacts for this proposal and to ensure that future in-combination assessments can be undertaken correctly. Any subsequent PVA required is likely to be requested as additional information.**

*D.4.5 Non-breeding season apportioning*

The Apportioning for HRA Appendix (11.6) details the approach to determining non-breeding season connectivity and apportioning impacts occurring in the non-breeding season to relevant SPAs. The Applicant has apportioned impacts in the non-breeding season to protected sites in the Western BDMPS[39] only even where a species foraging range means there is connectivity to other BDMPS regions. This approach was discussed pre-application as partially highlighted in Table 2.1 - Summary of pre-application consultation on offshore ornithology, ID numbers 112 and 113.

However, it was advised in further correspondence with the Applicant (email sent 10 March 2026) that this approach would not be suitable for species with large foraging ranges where there may be connectivity between the proposal within the Western BDMPS and SPAs from outwith the Western BDMPS, such as fulmar. It was advised that these should be included in the in-combination assessment so that the impacts can be tracked across projects / proposals.

**As such:**

- **We require the Applicant reviews the non-breeding season apportioning to check whether any additional impacts have not been accounted for due to apportioning to SPAs within the Western BDMPS only. Any subsequent PVA required is likely to be requested as additional information.**

*D.4.6 Population Viability Analysis*

Technical Appendix 11.7 provides information on the Population Viability Analysis (PVA) undertaken by the Applicant. It is noted that the Applicant has used a combination of site-specific, local and national productivity rates for undertaking PVAs for SPAs with connectivity to the proposal. As there are differences between the Scottish east and west coast populations, we are

[39] Western BDMPS incorporates UK Western Waters & Channel BDMPS which includes kittiwake and fulmar; UK West of Scotland Waters BDMPS which includes great black-backed gull and UK Western Waters BDMPS which includes gannet, common tern Arctic tern, guillemot, razorbill and puffin.

content to accept this in principle. However, it is not clear why the Applicant has selected local over national rates or vice versa in each specific situation. For example, for kittiwake at the Flannan Isles SPA a local productivity rate has been used but for kittiwake at North Colonsay and Western Cliffs SPA, a national rate has been used.

**As such:**

- **Clarification is requested as to the justification for each rate (local or national) that has been selected for each species at each SPA.**

*D.4.7 In-combination / cumulative assessment*

We are content with the approach taken for the in-combination / cumulative assessments, noting the in-combination assessment may need to be revisited once the re-apportioning of impacts has been undertaken as highlighted in our advice above (Sections D.4.4 and D.4.5).

It is noted that not all projects included a full impact assessment in their consent applications. Mortality estimates for these projects - Mona, Morgan and Morcambe offshore wind farms were calculated jointly, and these joint estimates have been used by the Applicant. We are content that this is acceptable.

**D.5 NatureScot appraisal – RIAA**

The RIAA draws on the HRA Screening Report submitted with the EIA Report. We confirm that we agree with the approach used to compile the long list of European sites and qualifying species screened in as having connectivity to the proposal as well as the conclusions reached in relation to likely significant effect (LSE) as per Table's 7.26 - 7.28 and Appendix 1 of the HRA Screening Report.

Our detailed advice on the European sites and qualifying species assessed in the RIAA is provided in this section of our advice. The assessment of AEoSI is primarily based on the PVA Counterfactual of Population Size (CPS) outputs after 35 years, using the outputs as presented in the RIAA Part 3 - Ornithology. However, in reaching our conclusions we also consider a range of other factors including:

- Counterfactual of Population Growth Rate (CGR) outputs and the % decrease in population growth rate;
- Status of the population including short and long-term trends;
- Condition of the qualifying species;
- Species ecology;
- Proportional importance of the species in Scotland and UK; and
- Impacts of HPAI and other recent mortality events.

PVAs were undertaken for the following impact pathways:

- Collision;
- Distributional responses; and
- Collision and displacement combined for gannet and kittiwake.

*D.5.1 Proposal alone conclusions on breeding seabird SPAs*


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We conclude No AEoSI for all SPAs and their qualifying species that the Applicants concluded did not require a PVA, noting that this is provisional advice subject to results of the re-screening and re-apportionment as requested above.

Our summary conclusions for the qualifying species from the SPAs where PVAs have been undertaken are shown in Table D1 below.

*Table D1: NatureScot determination of AEoSI for proposal alone impacts where PVA has been undertaken.*

| SPA | Species | High Impact CPS (median) | Low Impact CPS (median) | AEoSI Determination |
|---|---|---|---|---|
| Ailsa Craig | Gannet | 0.995 | 0.997 | No AEoSI |
| | Kittiwake | 0.986 | 0.991 | No AEoSI |
| Canna and Sanday | Kittiwake | 0.990 | 0.992 | No AEoSI |
| Cape Wrath | Kittiwake | 0.977 | 0.983 | No AEoSI |
| | Razorbill | 0.985 | 0.994 | No AEoSI |
| Flannan Isles | Kittiwake | 0.985 | 0.990 | No AEoSI |
| | Razorbill | 0.978 | 0.993 | No AEoSI |
| Handa | Kittiwake | 0.997 | 0.997 | No AEoSI |
| | Razorbill | 0.987 | 0.996 | No AEoSI |
| Mingulay and Berneray | Kittiwake | 0.986 | 0.989 | No AEoSI |
| | Razorbill | 0.971 | 0.987 | No AEoSI |
| **North Colonsay and Western Cliffs** | Kittiwake | 0.934 | 0.943 | No AEoSI |
| | **Guillemot** | **0.766** | **0.865** | **AEoSI** |
| North Rona and Sula Sgeir | Kittiwake | 0.987 | 0.991 | No AEoSI |
| | Great black-backed gull | 0.972 | N/A | No AEoSI |
| | Razorbill | 0.941 | 0.980 | No AEoSI |
| Rum | Kittiwake | 0.987 | 0.992 | No AEoSI |
| Shiant Isles | Razorbill | 0.989 | 0.996 | No AEoSI |
| St Kilda | Kittiwake | 0.991 | 0.994 | No AEoSI |
| | Razorbill | 0.956 | 0.984 | No AEoSI |
| Sule Skerry and Sule Stack | Puffin | 0.999 | 1.000 | No AEoSI |

Details are provided below for any sites / qualifying species where we have concluded AEoSI. We have only considered SPAs in Scottish Waters and advise Marine Directorate to seek advice from the relevant SNCB for advice on cross-border and transboundary SPAs.

Conclusions are also provided below for seabird assemblage features, where any named qualifying species of an assemblage feature in an SPA is protected in its own right. The SPA Conservation Objectives are set for individual species rather than the assemblage and therefore the features should be assessed and any impacts concluded at the individual species level. This is the established position in Scotland.



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*D.5.1.1 North Colonsay and Western Cliffs SPA*

*Table D2: Proposal alone PVA results for North Colonsay and Western Cliffs SPA.*

| SPA | Species | High Impact CPS (median) | Low Impact CPS (median) | AEoSI Determination |
|---|---|---|---|---|
| **North Colonsay and Western Cliffs** | Kittiwake | 0.934 | 0.943 | No AEoSI |
| | **Guillemot** | **0.766** | **0.865** | **AEoSI** |

We conclude:

- **AEoSI for guillemot at North Colonsay and Western Cliffs SPA.**

In reaching this conclusion, we considered:

- the very low CPS values
- a population decline of between 13.5 % – 23.4 %
- a decrease in population growth rate of between 0.4 % – 0.7 %
- the favourable condition of the feature
- a 26 % population decline between Seabird 2000 and Seabirds Count.

Based on the conclusion above, we also conclude **AEoSI for the breeding seabird assemblage feature at North Colonsay and Western Cliffs SPA**.

*D.5.2 In-combination conclusions on breeding seabird SPAs*

Our assessment of in-combination PVA results and determination of AEoSI for breeding seabird SPAs is provided below in the form of a summary table followed by more detailed assessments for individual SPAs and species.

The assessment conclusions are based on the data as it is presented in each species' table within the Technical Appendix 11.7: Population Viability Analysis using the *'In-comb WCS + Upper'* scenario. We have assumed this to be the in-combination worst case scenario for collision and upper displacement rate.

**As such:**

- **Confirmation is requested from the Applicant that the figures presented are the in-combination worst case scenario for collision and upper displacement rate.**

PVAs were undertaken for the sites detailed below in Table D3, and our advice is based on PVA outputs over 35 years.

We conclude No AEoSI for all SPAs and their qualifying species that the Applicant's concluded did not require a PVA, noting that this provisional advice subject to the results of the re-screening and re-apportionment as per our advice in Sections D.4.4 and D.4.5.



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Our in-combination conclusions for SPAs where PVAs have been undertaken are shown below. Where no in-combination assessment was possible due to no other developments / proposals being within range a N/A has been used in Table D3 below to denote this.

*Table D3: Summary of NatureScot's in-combination assessment of AEoSI for breeding seabird SPAs where PVA has been undertaken. Species highlighted in bold are considered to have moderate and therefore significant conclusions.*

| SPA | Species | High Impact CPS (median) | Low Impact CPS (median) | AEoSI Determination |
|---|---|---|---|---|
| **Ailsa Craig** | Gannet | 0.98 | 0.98 | No AEoSI |
| | **Kittiwake** | **0.88** | **0.89** | **AEoSI** |
| Canna and Sanday | Kittiwake | 0.99 | 0.99 | No AEoSI |
| Cape Wrath | Kittiwake | 0.93 | 0.94 | No AEoSI |
| | Razorbill | 0.96 | 0.98 | No AEoSI |
| Flannan Isles | Kittiwake | 0.99 | 0.99 | No AEoSI |
| | Razorbill | N/A | N/A | N/A |
| Handa | Kittiwake | 0.99 | 1.00 | No AEoSI |
| | Razorbill | 0.97 | 0.98 | No AEoSI |
| Mingulay and Berneray | Kittiwake | 0.99 | 0.99 | No AEoSI |
| | Razorbill | 0.95 | 0.97 | No AEoSI |
| North Colonsay and Western Cliffs | Kittiwake | 0.93 | 0.94 | No AEoSI |
| | Guillemot | N/A | N/A | N/A |
| North Rona and Sula Sgeir | Kittiwake | 0.99 | 0.99 | No AEoSI |
| | Great black-backed gull | N/A | N/A | N/A |
| | Razorbill | 0.94 | 0.98 | No AEoSI |
| Rum | Kittiwake | 0.99 | 0.99 | No AEoSI |
| Shiant Isles | Razorbill | 0.97 | 0.99 | No AEoSI |
| St Kilda | Kittiwake | N/A | N/A | N/A |
| | Razorbill | N/A | N/A | N/A |
| Sule Skerry and Sule Stack | Puffin | 0.97 | 0.98 | No AEoSI |

Details are provided below for any sites / qualifying species where we have concluded AEoSI and we have only considered SPAs in Scottish Waters and advise Marine Directorate to seek advice from the relevant SNCB for advice on cross-border and transboundary SPAs.

Conclusions are also provided below for seabird assemblage features, where any named qualifying species of an assemblage feature in an SPA is protected in its own right. The SPA Conservation Objectives are set for individual species rather than the assemblage and therefore the features should be assessed and any impacts concluded at the individual species level. This is the established position in Scotland.

*D.5.2.1 Ailsa Craig SPA*

*Table D4: In-combination PVA results for Ailsa Craig SPA.*



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| SPA | Species | High Impact CPS (median) | Low Impact CPS (median) | AEoSI Determination |
|---|---|---|---|---|
| **Ailsa Craig** | Gannet | 0.976 | 0.985 | No AEoSI |
| | **Kittiwake** | **0.881** | **0.885** | **AEoSI** |

We conclude:

- **AEoSI for kittiwake at Ailsa Craig SPA**

In reaching this conclusion, we considered:

- the low CPS value
- a population decline of up to 12 %
- the unfavourable recovering condition of the feature
- a 71 % population decline between Seabird 2000 and Seabirds Count.

Based on the conclusion above, we also conclude **AEoSI for the breeding seabird assemblage feature at Ailsa Craig SPA**.

*D.5.3 The Seas off St Kilda SPA conclusions*

Our assessment of impacts to the Seas off St Kilda SPA marine breeding seabird qualifying species was undertaken with respect to the functionally linked breeding colony SPAs[40]. The assessed SPAs / qualifying species, for which a PVA was undertaken, are listed in the table below along with our colony conclusions for AEoSI.

*Table D5: Summary of NatureScot conclusions for Seas off St Kilda SPA.*

| Marine SPA | Functionally linked SPA | Species | Colony SPA conclusion | In-combination conclusion |
|---|---|---|---|---|
| Seas off St Kilda | St Kilda | Kittiwake | No AEoSI | N/A |
| | | Razorbill | No AEoSI | N/A |

**We conclude no AEoSI for kittiwake and razorbill for Seas off St Kilda SPA.**

**D.6 NatureScot appraisal – EIA**

All relevant impact pathways have been assessed in the EIA Report, either quantitatively or qualitatively, and conclusions drawn on their significance.

[40] Conservation and Management Advice (2024) St Kilda SPA and Seas off St Kilda SPA: https://www.nature.scot/sites/default/files/special-protection-area/8580/conservation-and-management-advice.pdf

The key impact pathways for breeding seabirds – collision and distributional responses, were assessed quantitatively for proposal alone and cumulative impacts. Our assessment of these impacts in terms of their significance under EIA is provided below.

As in our advice on AEoSI for the RIAA, our assessments of significance under EIA are primarily based on the PVA Counterfactual of Population Size (CPS) outputs after 35 years. However, in reaching our conclusions we also consider a range of other factors including:

- Counterfactual of Population Growth Rate (CGR) outputs and the % decrease in population growth rate;
- Status of the population including short and long-term trends;
- Condition of the qualifying species;
- Species ecology;
- Proportional importance of the species in Scotland and UK; and
- Impacts of HPAI and other recent mortality events.

*D.6.1 Proposal alone assessment*

Our summary conclusions for the proposal alone impacts are shown in Table D6 below.

*Table D6: NatureScot summary conclusions for proposal alone impacts. Species in grey did not meet 0.02 % change in population size threshold for PVA. Species highlighted in bold are considered to have moderate and therefore significant conclusions.*

| Species | Mortality from proposal alone (low to high) | Median CGR after 35 years of impact (low to high mortality) | Median CPS after 35 years of impact (low to high mortality) | Applicant conclusion | NatureScot conclusion |
|---|---|---|---|---|---|
| Great northern diver | 0.4-0.6 | 1.000-1.000 | 0.994-0.985 | Minor | Minor |
| Kittiwake | 89.5-110.6 | 1.000-0.999 | 0.982-0.977 | Negligible | Negligible |
| Arctic tern | 1.5-2.1 | 0.999-0.999 | 0.968-0.956 | Negligible | Negligible |
| Common tern | 0.9-1.2 | 0.982-0.977 | 0.533-0.417 | Minor | *Minor |
| **Guillemot** | **658.9-1326.5** | **0.999-0.997** | **0.947-0.897** | **Minor** | **Moderate** |
| Razorbill | 74.1-159.3 | 0.999-0.999 | 0.979-0.955 | Minor | Minor |
| Great black-backed gull | 0.8 | 1.000 | 0.990 | Minor | Minor |
| Herring gull | 8.0 | 1.000 | 0.981 | Minor | Minor |
| Puffin | 24.7-50.6 | 1.000-1.000 | 0.999-0.998 | Negligible | Negligible |
| Fulmar | 0.7-1.9 | 1.000-1.000 | 1.000-1.000 | Negligible | Negligible |
| Gannet | 19.1-28.7 | 1.000-1.000 | 0.999-0.998 | Negligible | Negligible |

** please see further advice below*

Further advice is provided below, including for the species where we have concluded the impacts under EIA are significant.

*D.6.1.1 Guillemot*

The PVA results for guillemot from proposal alone impacts are shown below in Table D7.



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*Table D7: proposal alone assessment PVA results for guillemot (range represents lower and higher displacement scenario).*

| Scenario | Median CGR | Median CPS |
|---|---|---|
| 'National' rates | 0.9985-0.9970 | 0.9475-0.8972 |
| 'Local' rates | 0.9985-0.9970 | 0.9474-0.8968 |

We conclude that there will be a moderate and thus **significant effect from the proposal alone** in EIA terms for:

- **Guillemot from displacement.**

In reaching this conclusion, we considered:

- the low CPS values, which represent a decrease in the regional population size after 35 years of up to 10.3 %
- the moderate CGR values, which represent a decrease in the population growth rate after 35 years of up to 0.3 %
- the status of the guillemot population, with a 31 % decrease in Scottish and a 11 % decrease in the UK populations between Seabird 2000 and Seabirds Count.

### *D.6.1.2 Common tern*

The PVA results for impacts to common tern from the proposal alone from displacement and collision is shown below in Table D8.

*Table D8: proposal alone assessment PVA results for common tern (range represents lower and higher scenario).*

| Scenario | Median CGR | Median CPS |
|---|---|---|
| 'National' rates | 0.9834-0.9778 | 0.5438-0.4440 |
| 'Local' rates | 0.9823-0.9765 | 0.5333-0.4167 |

The Applicant has used mean CGR and CPS in the description of the PVA results (Paragraph 492, Chapter 11), rather than median. This has resulted in substantially different numbers than expected being presented. We would expect a CPS reduction of up to 58.3 % after 35 years when using the Minches and West Scotland demographics, rather than 30.1 %. These outputs in the context of the breeding population would be of concern.

However, we note the Applicant's narrative on common tern (Paragraph 493, Chapter 11), highlighting a number of factors that should be considered when determining magnitude of impact. These include, the confidence intervals being high, low population estimates, the ratio used for apportioning being misleading due to small sample size and, most notably, the peak monthly abundance and MSP being higher than the regional population size.

In addition, we consider the August 2021 survey to have captured a migration passage, based on:

- Common tern hatch dates being late June to mid-July, with young flying 3-4 weeks after hatching – they do not usually remain at colony for more than a few days.



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- Most breeding sites are empty by mid-August. In late summer / early autumn large flocks are seen in passage on the east and west coasts, with 2,000 seen in the Sound of Mull on 15 August 2003 (Forrester et al., 2007[41]).
- The date of the breeding season peak abundance (126 birds based on raw count of 8 or 21 apportioned) was 14 August 2021.
- The regional adult population is placed at 42 birds and there were no other large aggregations in other months (second largest in July 2022, 2 birds raw count / abundance estimate of 18).
- The survey timing would be in line with the Furness (2015)[42] autumn migration.

As a result, we have undertaken a PVA using the biogeographic population to understand how changing from a breeding population to a migration aggregation would alter the outputs.

The results have shown that predicted impacts would be negligible in the context of the larger migratory population. However, we advise if consented, the Applicant should validate this conclusion through monitoring such as radar tracking.

If this DAS sample is shown to be a one-off occurrence, we are content to agree with the Applicants' conclusions in the EIA Report - that the effects will be minor and not significant in EIA terms. Should the monitoring results indicate that this area is of high migratory importance, further discussions will be required with NatureScot.

**As such:**

- **We advise monitoring is required to validate conclusions that the impacts to migratory common tern would be negligible.**

*D.6.2 Cumulative assessment*

Our summary conclusions for the cumulative impacts are shown in Table D9 below.

*Table D9: NatureScot summary conclusions for cumulative impacts. ND indicates that no quantitative assessment was undertaken due to a lack of data, which we accept. Species highlighted in bold are considered to have moderate and therefore significant conclusions.*

| Species | Mortality from proposal alone (low to high) | Median CGR after 35 years of impact (low to high mortality) | Median CPS after 35 years of impact (low to high mortality) | Applicant conclusion | NatureScot conclusion |
|---|---|---|---|---|---|
| Great northern diver | 0.4-0.6 | ND | ND | Minor | Minor |
| **Kittiwake** | **89.5-110.6** | **0.997-0.997** | **0.893-0.887** | **Negligible** | **Moderate** |
| Arctic tern | 1.5-2.1 | 0.999-0.999 | 0.970-0.959 | Negligible | Minor |
| Common tern | 0.9-1.2 | 0.983-0.977 | 0.524-0.433 | Minor | Minor* |
| Razorbill | 74.1-159.3 | 0.999-0.997 | 0.958-0.895 | Minor | Minor |
| Great black-backed gull | 0.8 | 0.999 | 0.975 | Minor | Minor |

[41] Forrester et al. (eds) 2007. *The Birds of Scotland.* The Scottish Ornithologists' Club. Aberlady.
[42] Furness, R.W. 2015. *Non-breeding season populations of seabirds in UK waters: Population sizes for Biologically Defined Minimum Population Scales (BDMPS)*. Natural England Commissioned Reports, Number 164.


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| | | | | | |
|---|---|---|---|---|---|
| Puffin | 24.7-50.6 | 1.000-1.000 | 0.993-0.986 | Negligible | Negligible |
| Fulmar | 0.7-1.9 | 1.000-1.000 | 0.999-0.998 | Negligible | Negligible |
| Gannet | 19.1-28.7 | 0.999-0.999 | 0.978-0.966 | Negligible | Negligible |

Further advice is provided below, including for the species where we have concluded the cumulative impacts under EIA are significant.

*D.6.2.1 Kittiwake*

The PVA results for kittiwake from cumulative impacts for collision and displacement are shown below in Table A10.

*Table D10: Cumulative assessment PVA results for kittiwake.*

| Scenario | Median CGR | Median CPS |
|---|---|---|
| 'National' rates | 0.9969-0.9967 | 0.8928-0.8872 |
| 'Local' rates | 0.9969-0.9967 | 0.8930-0.8872 |

We conclude that there will be a moderate and thus **significant effect cumulatively** for:

- **Kittiwake from collision and displacement.**

In reaching this conclusion, we considered:

- the relatively low CPS values, which represent a decrease in the regional population size after 35 years of up to 11.3 %
- the relatively low CGR values, which represent a decrease in growth rate of up to 0.33 %
- the vulnerability of the population, with a 57 % decrease in Scottish and 43 % decrease in the UK populations between Seabird 2000 and Seabirds Count.

*D.6.2.2 Common tern*

As detailed above in our advice for proposal alone impacts to common tern, we believe the aggregation of common tern recorded in the DAS in August 2022 to be migratory. Therefore, we do not believe the outputs of the PVA to reflect biological reality in the breeding season. As a result, we are content to conclude minor and thus not significant effects from the cumulative impact assessment as long as the monitoring advice provided in the proposal alone appraisal in Section D.5.1.2 is followed.

*D.6.3 Greenland white-fronted geese*

Greenland white-fronted geese have suffered sustained population declines over multiple years, which the Applicant has acknowledged and as such undertaken separate collision risk modelling for this species. The Applicant has highlighted a discrepancy between the avoidance rate within the mCRM tool and the Woodward et al. (2023) report. The modelling has been undertaken using the avoidance rate detailed within the mCRM tool. However, we would recommend that the Woodward et al. (2023) value of 0.9998 be used for any future modelling of this species.

Greenland white-fronted geese are connected to several SPAs in the South and West of Scotland and may migrate through the WDA. While we note the assessment undertaken by the Applicant


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has explored the migratory collision risk model outputs, we have been made aware of the emerging global concerns for this species. In particular, the global population of Greenland white-fronted geese has fallen significantly, and the population is now considered Critically Endangered – the latest population estimate in Spring 2025 was 13,303 birds. Greenland white-fronted geese have undergone major declines with a 11.6 % decline between Spring 2024 and 2025. While climatic variables add uncertainty to predictions, on the current trajectory the population could be extinct within 20 – 50 years.

**As such:**

- **We require the mCRM to be updated for Greenland white-fronted geese with the correct population figure and avoidance rate.**

The main cause of the decline is poor productivity linked to increased snow in Greenland early in the breeding season, and there is also a level of illegal shooting in Iceland. However, the UK and Ireland are the main wintering grounds for this species, and whilst we are already working on several actions, there are others we can / are being asked to take to ensure that the birds are protected and in the best possible condition while they are in Scotland.

Range States (UK, Ireland, Iceland and Greenland) have convened an Emergency Meeting to address the situation as recommended in the AEWA International Single Species Management Plan (ISSAP)[43]. NatureScot and JNCC are working together to identify measures and commitments we can make to address the decline.

We are aware that migratory flights of this species path are likely to cross the WDA, particularly due to the proximity of designated sites on Islay / Kintyre.

**As such:**

- **We require further consideration of impacts to Greenland white-fronted geese through monitoring work (such as radar) as well as analysis of existing tracking data, prior to construction, to provide a better understanding of migration through the WDA and validate Applicant conclusions within the EIA Report.**

Depending on the outcomes of the monitoring, curtailment of turbine operation during key migratory windows could mitigate impacts. However, if monitoring shows that the Greenland white-fronted geese do not pass through the WDA then this would not be required.

**D.7 Other impact pathways**

It is noted by the Applicant in Paragraph 141 (Chapter 11) that they were unable to access the FeAST tool[44] as it was not fully functional for seabirds at the time of writing, which we acknowledge.

Collision risk with installed but not commissioned (or decommissioned) WTG and construction vessels, ghost fishing, and collision risk with structures below the water were scoped out of the assessment, which we are content with.

[43] International Single Species Management Plan for the Greylag Goose (Northwest/Southwest European Population)
[44] FeAST Tool: https://feature-activity-sensitivity-tool.scot/


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*D.7.1 Direct distributional responses and displacement during construction and decommissioning*

We welcome the Applicant's consideration of a range of impact pathways and note that NatureScot's Guidance Notes 8 and 4[45], along with project-specific consultation advice, has been used to inform the assessments.

*D.7.1.1 Above sea disturbance*

It is noted in Paragraph 163 (Chapter 11) that great northern diver, kittiwake, Arctic tern, common tern, guillemot, razorbill, puffin, fulmar and gannet were scoped in for above sea disturbance. Great northern diver was considered to have high sensitivity to disturbance, and the other species were considered to have a medium sensitivity. Given the temporary nature of the activities as well as limited spatial extent, we are content with the negligible magnitude score applied and overall conclusion of not significant.

*D.7.1.2 Disturbance associated with subsea noise*

Disturbance associated with underwater noise generated through piling activity and UXO clearance have been assessed in Section 11.11.1.4.3.3 (Chapter 11) of the EIA Report.

The Applicant has committed to embedded mitigation through the production of a detailed MMMP to minimise impacts from both pilling and UXO clearance. As the impact will be temporary and limited in spatial extent, we are content with the sensitivity and magnitude scoring applied giving an overall conclusion of not significant in EIA terms.

*D.7.1.3 Disturbance associated with vessel movements to and from ports*

The assessment of potential impacts from vessels transiting to and from ports during construction and decommissioning is provided in Section 11.11.1.4.3.4 (Chapter 11) of the EIA Report.

It is noted that the construction phase may last up to five years and assumes that construction activities may be undertaken 24 hours a day, seven days a week depending on weather conditions. There will be a maximum of 117 construction vessels operating within the WDA at any one time and a predicted 5,699 vessel movements during the entire construction period (round trips to and from port).

The Applicant has provided a literature review to determine disturbance associated with vessel movements to and from ports. Potential port locations are:

- Marshalling and Assembly (Construction): Kishorn, Arnish / Stornoway and Hunterston.
- Marine Operations (Construction): Oban, Port Ellen and Bendoran (Mull).
- Operation & Maintenance: Campbeltown / Machrihanish, King George V (Glasgow) and Hunterston.

The vessel disturbance assessment provided in the EIA Report contains the appropriate detail for the level of information available at this time. Two marine SPAs with wintering waterfowl qualifying species are located within 15 km of the WDA - Coll and Tiree SPA designated for great northern diver and common eider, and West Coast of the Outer Hebrides SPA designated for great

[45] NatureScot Guidance Note 4 – determining connectivity with marine SPAs and breeding seabirds from colony SPAs in the non-breeding season: https://www.nature.scot/doc/guidance-note-4-guidance-support-offshore-wind-applications-ornithology-determining-connectivity


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northern diver, black-throated diver, common eider, long-tailed duck, red-breasted merganser and Slavonian grebe. Locations of these ports and indicative transit corridors are provided in Figure 11.2 (Chapter 11), some of which may require vessels to pass through or near these SPAs. In addition, the Clyde Sea Sill NCMPA, which includes breeding black guillemot as a qualifying species may also be impacted by vessel movements.

Embedded mitigation measures are included in Appendix 6 – Outline Environmental Management Plan (EMP). The proposed measures are in line with what we would expect and are appropriate. We note that these measures will be developed further, if consented, and following the implementation of mitigation, we provisionally agree minor adverse effects to sensitive species such as seaducks and negligible effects to species with medium sensitivity both for the proposal alone and cumulatively.

In relation to the RIAA, we advise that it is not possible to fully assess impacts from vessel movements on marine SPAs, as the proposal is not yet able to confirm which ports / harbours will be used to service the proposed wind farm. **We advise that these impacts can later be defined and managed via a VMP. We also advise monitoring of the relevant qualifying species from the marine SPAs to inform the VMP may be required**. We understand that Marine Directorate can secure this via condition and it is helpful to note that this approach has been used for consented offshore wind farms.

*D.7.1.4 Vessel movement during Operation and Maintenance*

A maximum of 423 vessel round trips are expected for routine operational and planned maintenance activities each year. Although more vessel movements between ports are expected over the duration of the operation & maintenance phase, there will be less vessels present at any one time. Displacement due to vessel movements during the operation & maintenance phase would therefore be temporary and localised. Therefore, we provisionally agree with the overall conclusion of negligible and not significant in EIA terms.

In relation to the RIAA, as advised above, it is not possible to fully assess impacts from vessel movements on marine SPAs, as the proposal is not yet able to confirm which ports / harbours will be used during routine operational and planned maintenance of the proposed wind farm. **We advise that these impacts can later be defined and managed via a VMP. We also advise monitoring of the relevant qualifying species from the marine SPAs to inform the VMP may be required**.

As above, once ports have been selected, this should be shared with NatureScot to discuss further assessment of impacts that will be required.

*D.7.2 Indirect disturbance and displacement of prey species (Construction & Decommissioning)*

Indirect effects assessed for this potential impact include those resulting from increased suspended sediment concentrations and redistribution, temporary habitat loss and disturbance or the production of underwater noise that may alter the behaviour or availability of prey species. We have reviewed the assessment provided in Section 11.11.1.5 and note the Applicant has concluded impacts are negligible or minor, which is not significant in EIA terms both for the proposal alone and cumulatively. However, **in relation to potential impacts from underwater noise to prey species during construction, we require further information on potential impacts**

**to sandeel (see our advice in Appendix E) before we are able to agree with the Applicants' conclusions.**

*D.7.3 Artificial construction lighting (Construction & Decommissioning)*

This impact is assessed in Section 11.11.1.6 of the EIA Report and in Section 6.2.3 of the RIAA (Part 3 Ornithology), and notes that artificial lighting at night (ALAN) may potentially be a source of attraction, disorientation or displacement for birds. Construction is planned to take place 24 hours a day over a period of up to five years and vessels will be lit at night, acknowledging that they will move around the site as construction progresses.

The Applicant highlights that only European storm petrels were recorded in the DAS and that Leach's storm petrel are not connected to the WDA as per tracking research undertaken by the RSPB on St Kilda (Bolton, 2025 unpublished)[46]. We request the Applicant provides this report once published to support this.

European storm petrels were recorded flying within the site with 85 sightings as stated in Table 5.2 of the RIAA, Part 3 Ornithology.

It notes in Section 6.2.3.2.2 of the RIAA that the Applicant was unable to undertake a semi-quantitative assessment of European storm petrel as the abundance estimates are likely to be substantial under-estimates of the true numbers of birds using the WDA. This is because DAS are not effective at detecting storm petrels, largely due to storm petrels being active at night. This is also highlighted in the Furness et al. (2026)[47] report that the Applicant commissioned as an update to the Deakin et al. (2022)[48] report.

Manx shearwater were the second most recorded species, as highlighted in Table 5.2 of the RIAA (Part 3 Ornithology), with 11,033 birds recorded sitting or flying within the WDA.

The Applicant undertook a semi-quantitative assessment as requested, evaluating the importance of the WDA for Manx shearwater by comparing the numbers recorded in the DAS to the regional population (Section 6.2.3.2.2 of the RIAA). This highlighted that in terms of regional importance, between 0.16 % - 1.34 % of the population was recorded using the WDA. The Applicant provides further evidence demonstrating that the area is unlikely to be a key foraging or rafting area for

[46] Bolton, M., Derren, F., Tremlett, C., Wischnewski, S., Franklin, K., Cleasby, I. and Gauld, J. (2025) (publication pending). Tracking of Leach's storm-petrel from St Kilda and European storm-petrel from Treshnish Isles: Final report. Tagging and tracking of seabirds on the west coast of Scotland

[47] Furness, R.W., Foster, A. and O'Brien, S.H. (2026). Evaluation of seabird attraction to lighting on offshore wind farms. Report by SLR Consulting Ltd and Anatec Ltd to SPR, ESB, NorthLand Power and OceanWinds.

[48] Deakin, Z., Cook, A., Daunt, F., McCluskie, A., Morley, N., Witcutt, E., Wright, L. and Bolton, M. (2022). A review to inform the assessment of the risk of collision and displacement in petrels and shearwaters from offshore wind developments in Scotland. Report by RSPB, BTO and CEH UK. Scottish Government, Edinburgh.



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Manx shearwater – Kober et al. (2010)[49], Stone et al. (1994)[50] and Waggitt et al. (2020)[51], whilst noting that the WDA is regularly used by this species.

The Applicant has also presented results from a tagging study that they supported, where Manx shearwaters were tagged on Lunga by the National Trust for Scotland. The figures provided in Annex 11.20 (Manx shearwater tracking work on Lunga in 2025) show that although most tracked bird activity was outside of the WDA, some of the tagged birds were recorded within, confirming connectivity.

It is acknowledged by the Applicant that the study was undertaken over a short period in the breeding season and there were some issues reported with downloading data from the tags. Therefore, we support the statement that further tracking work at different times of the breeding season would give a more complete picture of spatial use for this population of shearwaters.

We appreciate the work the Applicant has undertaken in order to assess potential impacts on Manx shearwater and European storm petrel, particularly on attraction to artificial light.

Furness et al. (2026) found that:

- Petrels and shearwaters are attracted to ALAN almost exclusively on nights with poor visibility (e.g. fog or no moonlight);
- It is almost entirely fledglings that are attracted to ALAN and become grounded or collide with structures;
- Adult shearwaters and petrels tend to avoid ALAN close to their colonies;
- Fewer birds are attracted to lights that are:
    - Of lower intensity;
    - A red light, compared to a white, blue or green light;
    - Flashing, compared to a steady continuous beam.

We welcome the addition of ALAN protocols in Paragraph 76, Appendix 6: Outline EMP. We would also like to see this section of the EMP expanded to include best practice from Australia and New Zealand for the adverse effects of ALAN on birds. In particular:

- Non-essential lights for safety and / or operations are eliminated;
- All essential lights are shielded, angled and / or positioned to only light areas required for operations and safety, and eliminate light spill;
- All essential lights use the lowest intensity as appropriate for operations and safety;
- All essential lights filter light spectra as appropriate for operations and safety (filter out blue / violet wavelengths).

A record of vessel numbers and lighting used should be kept, as well as the standard turbine lighting plan.

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[49] Kober, K., Webb, A., Win, I., Lewis, M., O'Brien, S., Wilson, L.J. and Reid, J.B. (2010). An analysis of the numbers and distribution of seabirds within the British Fishery Limit aimed at identifying areas that qualify as possible marine SPAs. JNCC Report 431.

[50] Stone, C.J., Webb, A. and Tasker, M.L. (1994). The distribution of Manx shearwaters Puffinus puffinus in northwest European waters. Bird Study 41:170-180.

[51] Waggitt, J.J., Evans, P.G., Andrade, J., Banks, A.N., Boisseau, O., Bolton, M., Bradbury, G., Brereton, T., Camphuysen, C.J., Durinck, J. and Felce, T. (2020). Distribution maps of cetacean and seabird populations in the North-East Atlantic. Journal of Applied Ecology, 57: 253-269.

Gloves should be worn where possible when handling birds and birds should only be handled by a trained Environmental Officer / Observer (or other such suitably trained individual). If possible, the bird should be placed in a box somewhere quiet and undisturbed until it can be released.

We would also recommend an Environmental Officer / Observer is present on board during sensitive chick fledging months (July – October) to monitor for strandings, as well as having a protocol for responding to strandings, with crew fully trained (as discussed in the Outline EMP).

**Based on the information provided in the Outline EMP, and the additional mitigation measures highlighted above, we are content to agree minor adverse effects for the proposal alone and cumulatively, which is not significant in EIA terms. However, further iterations of the EMP will need to be provided and agreed. In addition, a monitoring programme to validate the report by Furness et al. (2026) and better understand the impacts from ALAN will be required.** This monitoring should be developed, if consented, with input from specialists and agreed between relevant parties.

*D.7.4 In-direct habitat loss / change for prey species (Operation & Maintenance)*

It is noted in Paragraph 440 that approximately 1.5 % of the WDA is expected to be permanently lost. Great northern diver, auks and tern species are considered to have medium sensitivity to indirect operation and maintenance effects, whereas gulls, petrels, gannet and shearwaters are considered to have low sensitivity. All impacts to prey species are predicted to be localised and thus would not lead to population level effects. Therefore, we agree the overall conclusion for all species is negligible and thus not significant in EIA terms, both for the proposal alone and cumulatively.

*D.7.5 Artificial operational lighting*

As highlighted in Paragraph 457, most infrastructure lighting will be yellow or red, with the brightest lights being the red, flashing aviation warning lights at up to 2,000 candela. These will be placed in the nacelle (approximately 150 -175 m above sea level) and will be shielded below horizontal so will not be visible to species that fly low over the sea surface. The relevant best practice principles outlined in our advice above (Section D.7.3) should also be followed for the operational and maintenance phase.

It is unclear how much procellariforms are attracted to the nearby Dubh Artach lighthouse, which has a flashing white light and is visible from 20 nautical miles.

During operation and maintenance, there will be less vessels on site than during the construction and decommissioning phases. These vessels are likely to be smaller and present for less time. These effects are likely to be of negligible magnitude, giving minor adverse effects, which is not significant in EIA terms. However, a monitoring programme, as suggested by Furness et al. (2026) to better understand the impacts from ALAN will be required. This could include monitoring changes at colonies close to the proposal for changes in population size, productivity and adult survival as well as tagging studies to understand behaviour. Given much of this is unknown, some caveats around frequency of reporting, indication of peak risk times and potential adaptation of monitoring may be expected post-consent. We advise the Applicant discusses monitoring programmes with us at the outset, if consented.

**D.8 Mitigation**



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Embedded mitigation measures for offshore ornithology are detailed in Section 11.9 of the EIA Report and it notes that where additional mitigation measures are required to mitigate potentially significant effects, these are detailed in the impact assessment. However, as the Applicant did not conclude any impacts to be significant, no additional mitigation has been proposed.

As noted in our advice, we disagree with the Applicant and have concluded significant adverse effects to guillemot from the proposal alone and cumulatively for kittiwake.

In line with established EIA practice, we expect mitigation to be identified where a significant adverse effect is identified.

Without prejudging the outcome of the Appropriate Assessment, we anticipate, compensatory measures would need to be secured for these species. As such, we consider that agreed compensation measures could be sufficient to address significant effects predicted under EIA.

**D.9 Monitoring**

Post-consent monitoring of the predicted impacts of a development is necessary to validate the conclusions of the EIA and to further our collective understanding of the effects of offshore developments on the marine environment. As such, we have requested monitoring in our advice above.

Monitoring is also important in understanding the effectiveness of mitigation measures, and to confirm that impacts not requiring mitigation are not causing environmental damage (Scottish Natural Heritage, 2018)[52].

The continued monitoring of seabird breeding colonies through schemes such as the Seabird Monitoring Programme is also a crucial element of understanding the impact of offshore developments on our seabird populations at the colony level.

**As such:**

- **Monitoring requirements should be discussed and agreed with Marine Directorate, NatureScot and other stakeholders in respect of EIA and HRA.**

**D.10 Transboundary effects**

Transboundary effects have been assessed in Section 11.13 of the EIA Report, and it is noted in Paragraph 615 that there is the potential for transboundary cumulative impacts at offshore wind farms outwith UK Waters, in particular those in Republic of Ireland waters. As highlighted above in our advice, we have only considered impacts in Scottish Waters and advise Marine Directorate to seek advice from the relevant SNCB for advice on cross-border and transboundary impacts.

[52] https://www.nature.scot/doc/archive/environmental-impact-assessment-handbook-version-5-2018

**NATURESCOT ADVICE ON MACHAIRWIND OFFSHORE WINDFARM**

**Appendix E – Fish and Shellfish Ecology**

Fish (including basking shark) and shellfish ecology interests are considered in Chapter 9 (Volume 2) of the EIA Report and the following relevant supporting appendices and documents:

- Volume 3c, Appendix 9.1: Fish (including Basking Shark) and Shellfish Baseline Technical Report
- Volume 3c, Appendix 10.1: Underwater Noise Modelling Report
- Volume 3a, Appendix 8: Invasive Non-Native Species Mitigation Plan
- Supporting Document: Nature Positive Plan
- Report to Inform Marine Protected Areas Assessment
- Report to Inform Appropriate Assessment
- Chapter 12: Commercial Fisheries (which we have reviewed in the context of characterisation only)

In addition, we note information provided within the MachairWind WDA Scoping Report (Appendix E - Environmental DNA Survey Interpretative Report - SCOP0057) [53] is referenced within the EIA Report but is not included within the Technical Appendices.

Our interest in fish and shellfish species is as key prey species (such as herring, sandeels etc.) as well as fish Priority Marine Features (PMFs) and protected features of designated sites. The Applicant has provided a Report to Inform Marine Protected Areas Assessment in relation to the Sea of the Hebrides NCMPA basking shark protected feature as well as the Loch Sunart to the Sound of Jura NCMPA flapper skate protected feature. We provide advice regarding potential impacts to these NCMPAs within Section E.9 of this Appendix.

On review of Chapter 9, we note that supporting narrative to inform the Applicant's conclusions is generally brief and becomes increasingly high-level as the assessment progresses. There are various instances in which references have not been provided to support key statements. On several occasions the reader is directed to the incorrect Figure or Table, often in supporting appendices, impacting the readability and flow of information within the Chapter. Further consideration to conveying key pieces of information to the reader efficiently and concisely would have been welcomed - for example, inclusion of a summary table for potential impacts scoped in / out without requiring navigation to the Scoping Report would have aided readability.

The assessment for fish and shellfish ecology concludes no significant impacts, both alone and cumulatively. We broadly agree with most of the conclusions regarding significance in EIA terms, however, there are elements of the assessment that we do not support and further information is requested.

In addition, for some other impact pathways and receptors we do not agree with the sensitivity and magnitude scores assigned by the Applicant. However, in most instances this does not change either the outcome of the assessment or the overall conclusion of our advice. Further comments and advice are provided below.

[53] https://marine.gov.scot/sites/default/files/241001_-_machairwind_-_scop-0057_-_appendix_e_-_environmental_dna_survey_interpretative_report_-_developer_to_md-lot.pdf



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## E.1 Study area

As illustrated in Figure 9.1, a local study area and regional study area have both been defined. The study areas are appropriate and have been informed by ICES rectangles as well as the maximum spring tidal excursion (local study area) and underwater noise modelling (regional study area).

## E.2 Baseline characterisation

Detailed baseline characterisation is set out within Appendix 9.1: Fish (including Basking Shark) and Shellfish Baseline Technical Report (Volume 3c). Existing desktop and site-specific data have been reviewed to inform the baseline characterisation for fish and shellfish ecology, and we are content this provides a sufficient approach to characterising the baseline environment to inform the EIA. All relevant species have been included and PMFs identified.

### *E.2.1 Methods*

As detailed in Appendix 9.1 an extensive list of appropriate datasets and information sources have been used to characterise the baseline.

Third-party and site-specific survey data including drop-down video and grab sampling have been considered in characterising the benthos. Sediment particle size distribution analysis has been undertaken using third-party data and considered in the context of habitat suitability for herring and sandeel, habitat assessments for these species are presented in Figures 1.11 and 1.12.

In addition, DAS results have been considered in relation to the presence of basking shark.

#### *E.2.1.1 eDNA sampling*

Environmental DNA (eDNA) samples were collected during the proposal's site investigation survey campaign. However, this has not been considered within the baseline characterisation.

The Applicant refers to the Scoping Report Appendix E: Environmental DNA Survey Interpretative Report. Whilst not considered for the baseline, this report was useful to review alongside the Appendix 8.2 to see which species were being detected in the area and it supports the species included as receptors within the EIA Report.

Although it is an emerging technique, we consider eDNA analysis to add value. For example, by improving identification of species that difficult to detect using traditional survey methods including cryptic species and non-native species. For future Applicants, we recommend that inclusion of eDNA sampling be considered in addition to traditional survey methods, and findings used to help contextualise the baseline.

### *E.2.2 Sandeel*

The Applicant acknowledges that the local study area supports 'preferred' sandeel habitat and a sandeel habitat assessment is provided in Figure 1.12 (Appendix 9.1). This assessment overlays EMODnet data with results from Particle Size Distribution (PSD) analysis undertaken using third-party data collected within the Option Agreement Area (OAA) and indicates that 'preferred' sandeel habitat is present across the OAA and WDA. As discussed in Section 1.4.3.2, PSD samples were predominantly classified as 'sand' with 'gravelly sand', 'muddy sand', 'sandy gravel' and 'gravel' also recorded. It is also noted that sandeel were recorded in both third-party grab samples and proposal-specific drop-down video.


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Desk-based information in relation to sandeel spawning grounds and nursery grounds is discussed in Table 1.5. The local study area overlaps with an undetermined intensity spawning ground and nursery ground (Coull *et al.,* 1998), and a low intensity nursery ground (Ellis *et al.,* 2012) as illustrated in Figure 1.3 and Figure 1.4 (Appendix 9.1).

Figure 1.13 presents heat-maps from modelled data by Langton *et al*., 2021 (available on NMPi) showing predicted probability of buried sandeel presence and predicted density of buried sandeels in the Celtic Seas. Overlap is shown between modelled data and the WDA boundary; however, minimal discussion of these predictions has been provided within the Baseline Technical Report or EIA Report.

While the extent of 'preferred' sandeel habitat within the local study area is discussed within the Baseline Technical Report, this is not necessarily reflected within the EIA Report and in some instances is downplayed within the assessment of impacts – particularly in relation to the potential impacts from underwater noise. We provide further advice below in Section E.4.1.1.

*E.2.3 Basking shark*

Basking shark are discussed in Section 1.4.4 of the Baseline Technical Report. The Applicant has considered appropriate literature and sightings data, in-line with those recommended at Scoping. Data from other developer surveys undertaken between 2009 and 2012 is also discussed.

Basking shark presence has also been recorded in DAS, although this survey campaign was primarily undertaken to inform the offshore ornithology and marine mammal assessment. Third-party DAS provides data from surveys conducted over a 16-month period between October 2020 and January 2022 and project-specific DAS undertaken for a 30-month period between April 2021 and September 2023 (see Appendix 9.1, Table 1.2). The third-party DAS recorded seven basking sharks in May 2021. Project-specific DAS recorded eight basking sharks between April 2021 and April 2023.

The Applicant acknowledges several limitations in relation to characterising basking shark abundance from DAS, as basking shark are not required to surface in order to breathe. We recognise the difficulties and uncertainties associated with estimating basking shark abundance and density effectively.

The WDA is sited approximately 4.4 km south of the Sea of the Hebrides NCMPA, which includes basking shark as a protected species. We provide advice in relation to the Sea of the Hebrides NCMPA and the Applicant's Report to Inform Marine Protected Areas Assessment below in Section E.9.

## E.3 Approach to assessment

The approach to assessment for fish and shellfish ecology is generally acceptable and mostly as expected following the Scoping Report. However, there are elements of the impact assessment that we do not support, and we provide further commentary and advice below.

*E.3.1 Receptor groups*

The species assessed have been categorised into receptor groups. Whilst this is an accepted approach, we consider the resulting assessment to be generalised and high-level. Chapter 9 does not provide a clear summary of the receptor groups and species considered. Instead, in order to follow and appraise the assessment it has been necessary to cross-reference between several


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sections of Chapter 9 and Appendix 9.1: Fish (including Basking Shark) and the Shellfish Baseline Technical Report.

As described in Section 9.10.1.1 the receptor groups include elasmobranchs, demersal fish, and pelagic fish. Shellfish and diadromous fish have also been assessed and are discussed throughout the Baseline Technical Report and Impact Assessment. The species considered within each receptor group are referred to in narrative across Appendix 9.1: Fish (including Basking Shark) and Shellfish Baseline Technical Report (e.g. Section 1.4 which provides an account of pelagic fish, demersal fish and shellfish species in the local study area).

#### *E.3.1.1 Ocean quahog*

Ocean quahog have been included within the shellfish receptor grouping and is therefore assessed within the impact assessment for fish and shellfish. However, ocean quahog is also considered and assessed within Chapter 8: Benthic Ecology.

Our advice in relation to ocean quahog is predominantly provided in Appendix F, however, we also provide further comments and advice below in Section E.4.1 – noting there are potential implications for the conclusions presented for the shellfish receptor grouping in Chapter 9.

### *E.3.2 Potential impacts scoped in*

Table 9.5 sets out the impacts that have been scoped in for assessment. For completeness, it would have been useful for the EIA Report to also include a table of impacts that were scoped out of the assessment.

We consider the impact pathways included to be appropriate, with the exception of how fish aggregation has been considered within the Applicant's consideration of introduction of hard substrates – we provide advice on this potential impact below in Section E.4.3.

### *E.3.3 Underwater noise modelling*

The assessment of potential impacts on fish ecology receptors from underwater noise has been informed by the supporting Underwater Noise Modelling Report (Appendix 10.1, Volume 3c). We consider the underwater noise modelling approach presented in Appendix 10.1 to be appropriate and this applies recognised assessment criteria for fish (Popper *et al.,* 2014).

### *E.3.4 Significance of effect*

#### *E.3.4.1 Sensitivity and magnitude scoring*

The Applicant's definitions for sensitivity and magnitude scoring (Table 9.7 and Table 9.8) are generally appropriate. However, it is noted that the descriptions of magnitude are very similar between negligible and low.

We note some instances in which the assessment itself deviates from the definitions provided. For example, tolerance has been discussed within the assignment of magnitude rather than sensitivity, and spatial context has been considered within sensitivity rather than magnitude. There are also instances where the assessment discusses significant impacts on the receptor prior to assessing sensitivity. However, we do not consider these discrepancies to affect the overall conclusions of the impact assessment fish and shellfish.

In some instances, we disagree with the sensitivity and magnitude scores assigned by the Applicant and further advice is provided below in Section E.4.

*E.3.4.2 Significance matrix*

We accept the significance matrix approach as presented in Table 9.9, noting that this matrix is relatively conservative in comparison to matrices we have seen in other EIA Reports, which often tend to be heavily weighted towards minor or negligible outcomes. The approach applied by the Applicant is welcomed.

Whilst we do not support some of the sensitivity and magnitude scores assigned by the Applicant, we are mostly in agreement regarding the overall conclusions of significance presented. With two exceptions as previously highlighted and discussed below in Section E.4.

**E.4 Impact assessment**

As highlighted above, there are elements of the impact assessment that we do not support, and we provide advice and comments as follows.

We also note that there are inconsistencies between the conclusions presented in Section 9.11 (Assessment of Significance) and those summarised in in Table 9.31 of Section 9.16 (Summary). Where there are discrepancies, we have considered the more precautionary conclusion in our appraisal.

*E.4.1 Sensitivity and magnitude scoring*

On review of Chapter 9, there are instances in which we conclude differing sensitivity and magnitude scores to those assigned by the Applicant and we summarise this below in Table E1.

In relation to ocean quahog, the scoring considered in our appraisal would bring the assessment of impacts in-line with those in Chapter 8 and our advice on Benthic Ecology as per Appendix F.

However, noting the approach taken in the significance matrix, we support the Applicant's overall conclusions of not significant in EIA terms for these impacts and receptors. With the exception of Impact 3: UWN and vibration, where further consideration of magnitude of is required.

*Table E1. NatureScot appraisal of sensitivity and magnitude, with differing conclusions indicated in red. We highlight where our appraisal is in relation to a specific species, see bold italics and * indicates that ocean quahog has also been assessed within Chapter 8: Benthic Ecology.*

| Impact | Phase | Receptor | EIA Report Assessment | | NatureScot Appraisal | |
|---|---|---|---|---|---|---|
| | | | Sensitivity | Magnitude | Sensitivity | Magnitude |
| Temporary physical disturbance / habitat loss | All (Construction, Operation & Maintenance, Decommissioning) | Shellfish - ***ocean quahog**** | Medium | Negligible | High | Negligible |
| Increased SSCs and | All (Construction, | Spawning Grounds – | High | Negligible | High | Low |



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| | | | | | | |
|---|---|---|---|---|---|---|
| sediment redeposition | Operation & Maintenance, Decommissioning) | herring & sandeel<br>Spawning grounds – other spp. | Medium | Negligible | | Low |
| | | Nursery grounds | Medium | Negligible | Medium | Low |
| | | Shellfish | Medium | Negligible | Medium | Low |
| UWN and vibration | Construction | Spawning grounds - ***Herring*** (group 4) | Medium | Low | High | Low |
| | | Pelagic Fish, Demersal<br>Fish, Elasmobranchs - ***Sandeel*** | Medium | Low | Medium | **Additional information requested** |
| Permanent habitat loss | Operation & Maintenance | Shellfish - ***ocean quahog**** | Medium | Negligible | High | Low |
| Introduction of hard substrate | Operation & Maintenance | Shellfish - ***ocean quahog**** | Medium [54] | Negligible | High | Negligible |

*E.4.2 Underwater noise and vibration (Impact 3) – sandeel*

The Applicant has concluded a minor adverse effect for sandeel from underwater noise and vibration during construction, on the basis of a medium sensitivity and low magnitude. We support the sensitivity score of medium however, we do not support the rationale provided in relation to the conclusion of low magnitude.

Paragraphs 192-195 suggests that areas of higher-probability habitat for sandeel occur mostly outside mortality, injury and Temporary Threshold Shift (TTS) ranges, on the basis of the modelled SELcum contours and habitat predictions from Langton *et al.,* 2021 - as presented in Figure 9.4. However, we consider this understates the potential impacts to sandeel. As highlighted above,

[54] Sensitivity of 'medium' is listed in Table 9.31, this differs from the narrative provided in Section 9.11.1.10.1.5 and Table 9.22.



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the baseline characterisation indicates that 'preferred' sandeel habitat is present throughout the WDA.

Figure 9.4 indicates the modelled contours for mortality and injury from the four representative points modelled. However, the Applicant has not considered the modelling outputs in the context of the total number of WTG's) proposed across the WDA i.e. the whole extent of suitable sandeel habitat potentially impacted by underwater noise. We advise that the injury contours, as predicted by modelling, could affect a meaningful proportion of the local population of sandeels within the WDA.

Furthermore, we note that Figure 9.4 shows the modelled noise contours from the North East modelling location to overlap with an area of 'More Probable' presence of buried sandeel (Langton *et al.,* 2021) and undetermined intensity spawning grounds (Coull *et al.,* 1998).

Overall, we do not consider the narrative and conclusions to sufficiently reflect the extent of suitable sandeel habitat within the WDA.

**As such:**

- **Re-assessment of underwater noise impacts to sandeel is required, including a review of the magnitude scoring and spatial overlap with suitable as well as 'preferred' sandeel habitat.**

*E.4.3 Underwater noise and vibration (Impact 3) - Basking Shark*

*E.4.3.1 Barotrauma risk*

Basking sharks are correctly placed in Popper et al. (2014) Group 1, meaning they detect particle motion rather than sound pressure and are therefore among the least sensitive species to pressure-based auditory injury. However, this does not mean they are immune to barotrauma. Barotrauma is a mechanical effect, caused by rapid pressure changes rather than sensory detection, and can occur even in species without swim bladders. The EIA states that basking shark are highly mobile and that soft-start and ramp-up procedures should give individuals time to move away before high pressures occur. This assumption requires caution: if basking shark are not sensitive to pressure, they may not perceive the early stages of piling as a cue to move away, meaning mobility alone does not guarantee avoidance.

This creates a potential mismatch between the mitigation mechanism proposed and the species' sensory ecology. Soft-start only reduces risk if individuals detect the initial low-level piling and respond behaviourally. For basking shark, which rely on particle motion and may not detect pressure-based cues at low levels, there is a plausible scenario in which individuals remain within the footprint until higher pressures occur. In such cases, barotrauma could occur despite low auditory sensitivity. While the overall risk remains low due to the species' mobility and the limited spatial extent of SPLpeak injury zones, the EIA should have acknowledged that low pressure sensitivity does not equate to low barotrauma risk, and that avoidance cannot be assumed solely on the basis of mobility.

*E.4.3.2 Particle motion*

Particle motion has not been adequately assessed in the EIA assessment despite agreement during pre-application engagement that it would be considered qualitatively for relevant (Group 1) species. We acknowledge this is challenging because empirical data, modelling approaches and


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regulatory thresholds for this pathway are still limited and note reference to this in the underwater noise modelling report (Appendix 10.1, Volume 3c). However, for basking sharks this omission is important. As elasmobranchs, they detect underwater sound primarily through particle motion rather than sound pressure, meaning their behavioural responses are driven by low frequency hydrodynamic cues generated by piling, drilling and vessel activity. This creates a realistic potential for disturbance or displacement even when pressure-based modelling suggests low risk. By relying solely on sound pressure metrics, the EIA could underestimate the true acoustic exposure pathway for basking sharks.

Despite this, we consider the risk of barotrauma to be low and largely restricted to the near-field. As such we agree there will be no significant effect in EIA terms although we acknowledge that this conclusion has some associated uncertainty.

Particle motion has been identified as a key evidence gap by ScotMER. As such, and in light of our conclusion above, **we request that the proposal, if consented, explores opportunities to contribute to emerging research in this field, especially given the proximity of the WDA to the Sea of the Hebrides NCMPA, where basking shark are a designated feature.**

*E.4.4 Permanent habitat loss (Impact 8)*

Permanent habitat loss has been considered as part of the operation and maintenance phase only, despite these impacts beginning to occur during construction and potentially continuing during and after decommissioning. At Scoping this approach was accepted given uncertainties around decommissioning. In-line with our advice on benthic ecology interests (see Appendix F), we highlight our expectation that this impact should be considered further within the decommissioning plan.

*E.4.5 Introduction of hard substrate (Impact 10)*

The Applicant states (Table 9.2) that potential impact of fish aggregation, around WTGs and other hard infrastructure, has been included within the assessment of the impact 'introduction of hard substrate'. We do not agree that the impact of fish aggregation has been sufficiently assessed.

The assessment of significance for this impact (Section 9.11.1.10) briefly outlines that hard structures could serve as fish aggregation points and may attract predators (Paragraph 382 and 383). However, no further discussion regarding the impacts of fish aggregation is included. No assessment of the sensitivity, magnitude or significance for any receptor group relevant to this impact has been undertaken.

**As such:**

- **The potential impact of fish aggregation should be assessed with clear and thorough consideration of sensitivity, magnitude and significance for relevant receptor groups - including diadromous fish.**

*E.4.6 Interactions with Electromagnetic fields (EMF) (Impact 9)*

Section 9.11.1.9.1 discusses potential for impacts to fish and shellfish receptors from EMFs from subsea cabling. The total length of cabling proposed within the WDA is approximately 1,044 km, which includes inter-array, offshore substation platform links and offshore export cables. As noted in Paragraph 340, the cable minimum burial depth will be between 0.3 m and 3.0 m but typically between 1.0 and 2.0 m. For any cables buried less than 1.0 m, cable protection will be

required, and the Applicant has estimated this to be up to 25 % of the total cable length, as a worst-case scenario. We agree that the risk of exposure to EMF is lower for the buried portions of cable but highlight that a burial depth of 1 – 2 m is preferable.

Given the potential EMF levels and proposed minimum burial depth of 0.3 m, we consider the magnitude should be revised from negligible to low. However, noting the significance matrix, we are in support of the Applicant's conclusions of not significant for all impacts to fish and shellfish receptors, despite our differing magnitude scores.

As our collective understanding of EMF effects remains poor, particularly in relation to in-field measurements of EMF and potential impacts to sensitive receptors (such as elasmobranchs including basking shark). In line with other recently consented offshore wind farm proposals, **we advise that monitoring of EMF should be considered to validate predicted EMF effects.**

*E.4.7 Inter-related and interacting impacts (Section 9.14)*

Tables 9.27, 9.28, and 9.29 outline potential impacts that interact with each other. Little narrative is provided and so the rationale for some conclusions is unclear, for example:

The Applicant has concluded Impact 6: INNS and Impact 10: Introduction of Hard Substrate to have no potential interaction. We disagree and consider there to be a potential interaction between these impacts as INNS could settle on introduced hard substrate. This is of relevance to the Invasive Non-Native Species Mitigation Plan (M-9).

Impact 9: Electro-Magnetic Fields are listed as having a potential interaction with both Impact 7: Changes in Fishing Activity and Impact 8: Permanent Habitat Loss. The potential interaction between these impacts is not immediately clear and should be clarified, noting this appears inconsistent with the conclusions of interactions provided within Chapter 8: Benthic Ecology.

**As such:**

- **Clarification is requested on the rationale for the potential interaction between Impact 9 (EMF) with Impact 7 (Changes in Fishing Activity) and Impact 8 (Permanent Habitat Loss).**

**E.5 Cumulative effects**

The cumulative impact pathways for fish and shellfish receptors have been identified in Table 9.24.

We note that Impact 4: Disturbance and Displacement of Basking Shark and Impact 5: Vessel Collision for Basking Shark have been screened out of the CEA. Considering the Applicant's methodology for CEA we would have expected these impacts to be screened in for further consideration. However, in this instance we do not consider there to be a significant cumulative impact to basking shark in EIA terms.

Overall, for potential cumulative impacts to fish and shellfish receptors we support the Applicant's conclusion of not significant in EIA terms.

**E.6 Mitigation**

As all impacts have been assessed as not significant, no additional mitigation measures are proposed beyond the embedded mitigation outlined in Table 9.9, which is largely the production of and adherence to post-consent plans and programmes. These plans themselves do not


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constitute mitigation; however, we are content that embedded mitigation within them is in line with similar developments, and therefore we accept this.

As stated at Scoping, we advise that any mitigation for marine mammals should also be applied to basking sharks.

*E.6.1 Invasive Non-Native Species Mitigation Plan (M-5)*

The INNS Mitigation Plan (Appendix 8, Volume 3a) includes detail in relation to identifying the risks to the introduction of INNS and proposed control measures.

We highlight that a new report by SAMS commissioned by ScotMER regarding '*Invasive non-native species mitigation measures for offshore renewables*' is soon to be published and we recommend that the Applicant consults this and modifies their Marine Invasive and Non-Native Species Biosecurity Plan once available.

*E.6.2 Piling Noise Mitigation Plan (M-6)*

Table 9.6 lists a Piling Noise Mitigation Plan as an embedded mitigation measure relevant to fish and shellfish, which is to be developed in accordance with Appendix 9**:** Draft MMMP.

We note that a 10 dB noise reduction is referred to within the draft MMMP as *"some form of embedded and/or additional mitigation*". In addition, the Underwater Noise Modelling Report states *"When considering noise reduction from mitigation, a nominal 10 dB reduction was included as an achievable figure, although specific systems to be implemented are not yet determined".* Although piling sleeves, hydro sound dampers or hammer attachments are provided as potential examples to achieve this, there is no firm commitment to the measure(s), and it is not clear how this would be achieved.

In addition, we have advised in Section E.4.2 a re-assessment of underwater noise impacts to sandeel is required, to determine if underwater noise could have a significant effect on sandeels.

**As such:**

- **Additional information should be provided for mitigation that is relied upon in making conclusions of significance, including how such measures will mitigate the effects and the effectiveness and degree of confidence that can be placed on such measures.** This may form part of a Fish Mitigation Plan. This plan, if required, should consider impact pathways during key life history stages for sandeel (spawning / winter hibernation) and whether scheduling of works would be of benefit in minimising impacts e.g. a seasonal restriction for piling.

*E.6.3 Draft Marine Mammal Mitigation Protocol (MMMP; Appendix 9)*

The draft MMMP is not listed as an embedded mitigation measure in Table 9.6 but is referred to within other embedded measures and in Chapter 9. We note that Section 1.3 of the draft MMMP states that mitigation measures will also be applied to basking shark.

Soft-start and ramp-up are discussed within the MMMP and included as embedded measures in Table 1.1. We reiterate our advice provided above in relation to underwater noise and vibration (Impact 3). As discussed above in Section E.4.3, the Applicants assumption that soft-start and ramp-up procedures should give basking sharks time to move away before high pressures occur requires some caution. This is because if basking shark are not sensitive to pressure, they may not


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perceive the early stages of piling as a cue to move away, meaning mobility alone does not guarantee avoidance.

*E.6.4 Nature Positive Plan*

We welcome the Applicant's consideration and inclusion of a Nature Positive Plan. The Nature Positive Plan includes possible options under consideration by the Applicant, including habitat pipes and standalone structures. In general, our preference would be for infrastructure design-based measures where feasible, rather than those which introduce additional hard structures onto the seabed. Consideration of impacts to other receptors may also be required, for example, increasing the risk of marine invasive non-native species, as well as the ability for future decommissioning. NatureScot can provide further advice on the Nature Positive Plan following refinement if required.

**E.7 Monitoring**

No monitoring has been proposed in relation to fish and shellfish interests on the basis that all impacts are assessed as not significant.

However, Section 9.15 states that *"the Applicant acknowledges the need for strategic, coordinated research to address current knowledge gaps regarding diadromous fish and supports the principle that developers should work together to fund strategic monitoring efforts. The Applicant is committed to working with stakeholders and welcomes further engagement with FMS (Fisheries Management Scotland) and other relevant bodies to explore opportunities for strategic research and monitoring."*

The Applicant has not confirmed their engagement with any research projects or committed to any monitoring, only acknowledges that it is needed for diadromous fish. The Applicant has not identified, acknowledged, or committed to further research on other receptor groups, where there are still large knowledge gaps, for example, the impact of particle motion barotrauma on receptors that cannot detect sound pressure (e.g. elasmobranchs such as basking shark). We encourage developers to engage in all ScotMER research projects.

We understand that the ScotMER project 'A Targeted Approach to Characterising EMF from Subsea Cables and Understanding Potential Impacts on Fish and Benthic Species' is due to report shortly. Recommendations from this report should be considered for inclusion in any relevant cable plans post-consent, where applicable. In addition, as noted above, we advise that monitoring of EMF should be considered to validate predicted EMF effects and to contribute to gaining better understanding of particle motion.

**E.8 Transboundary and cross-border impacts**

The Applicant concludes there to be transboundary effects from underwater noise during the construction phase, as the ZoI has a maximum range of 88 km and extends into Irish waters. The significance of this transboundary effect is concluded as minor adverse and not significant in EIA terms.

Given the extent of this ZoI and potential transboundary impacts in Irish waters, further advice should be sought from An Bord Pleanála and/or National Parks and Wildlife Service, as appropriate.


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Advice should also be sought from the Department of Agriculture, Environment and Rural Affairs (DAERA) in relation to potential cross-border impacts in Northern Irish waters.

**E.9 Report to Inform Marine Protected Area Assessment**

*E.9.1 Sea of the Hebrides NCMPA - Basking shark*

The Sea of the Hebrides NCMPA is located approximately 4.3 km to the north of the proposal and includes basking shark as one of its protected features. The NCMPA provides protection for high densities of basking sharks and protects important areas for feeding and social, group and courtship like behaviours.

Given the proximity to the NCMPA, agreement was reached during pre-application engagement that the Applicant would screen in basking shark for further assessment. For the purposes of the NCMPA assessments basking shark are only protected when they are within the site and as such the assessment should consider any activities that take place within or outside the NCMPA that could potentially kill or injure basking sharks in the MPA, as well as any activity that has the potential to reduce access to resources or cause disturbance of basking shark in the NCMPA[55].

Table 2.1 sets out those impact pathways screened in and out, which we largely agree with. Our appraisal, as outlined below, considers the two legislative tests relevant to NCMPAs. For each of the three impacts screened in, we consider whether the proposed development is capable of affecting, other than insignificantly, the protected basking shark feature of the NCMPA. Advice is therefore provided below on the second test for each impact pathway in turn.

*E.9.1.1 Suspended Sediment Concentration resulting in potential reduction in prey species*

Based on the extent and maximum concentrations of suspected sediment predicted by dispersal modelling (Appendix 7.1, Volume 3c) and noting the limited degree of overlap with the NCMPA, we agree there is no significant risk of hindering the Conservation Objectives of the site.

*E.9.1.2 Vessel collision and disturbance*

Basking sharks may be at risk of collision / disturbance from vessels. They are less likely to detect small faster vessels that emit higher frequency sound. Port selection and transit corridors have not been confirmed at this stage and as such indicative scenarios are provided which includes options that transit through the NCMPA on route to the WDA during construction.

In reviewing Section 9.9 (embedded mitigation) and the outline Environmental Management Plan (Appendix 6, Volume 3a) we note the commitment to adhere to the principles within the Scottish Marine Wildlife Watching Code[56] as well as the Basking Shark Code of Conduct[57], although there is no mention of mitigation within the outline Vessel Management Plan and Navigational Safety Plan (Appendix 13, Volume 3a). Furthermore, it is noted that the mitigation measures set out within the draft MMMP are also to be applied to basking shark. We highlight that ensuring there is

[55] https://www.nature.scot/sites/default/files/nature-conservation-mpa/10474/conservation-and-management-advice.pdf
[56] https://www.nature.scot/professional-advice/land-and-sea-management/managing-coasts-and-seas/scottish-marine-wildlife-watching-code
[57] https://www.sharktrust.org/basking-shark-code-of-conduct


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sufficient personnel onboard to observe any basking shark presence, especially during May to October, will be important to ensure the efficacy of these mitigation measures.

Providing suitable mitigation measures are secured, as above, we agree there is no significant risk of hindering the Conservation Objectives of the site.

*E.9.1.3 Underwater noise*

Section E.4.3 above sets out our consideration of underwater noise impacts to basking shark under EIA, noting they detect underwater sound primarily through particle motion rather than sound pressure. As such, there remains a low risk from barotrauma particularly as traditional underwater noise mitigation measures such as a soft-start may not be effective for this species, and that reliance on pressure-based modelling could underestimate the true acoustic exposure but this is largely unknown.

Based on the information available, and the anticipated near-field nature of the low barotrauma risk, we agree there is no significant risk of hindering the Conservation Objectives of the site. However, the scale of the proposal and its location to the south of the NCMPA is such that basking sharks could pass through the WDA while migrating northwards to important areas within the NCMPA. As such, we request that the Applicant explores opportunities to better understand particle motion as discussed above.

*E.9.1.4 Cumulative effects*

Although the assessment of cumulative effects provided in Section 6.3.1 is very high level, we agree there is no significant risk of hindering the Conservation Objectives of the site - noting that this conclusion is reached with the inclusion of mitigation and monitoring as discussed above.

*E.9.2 Loch Sunart to the Sound of Jura NCMPA - Flapper Skate*

Loch Sunart to the Sound of Jura NCMPA is located approximately 45 km to the east of the proposal and includes flapper skate as one of its protected features. The NCMPA provides protection for this critically endangered species. For the purposes of MPA assessments flapper skate are only protected when they are within the site. Any activities that take place within or outside the ncMPA that could potentially kill or injure flapper skate in the NCMPA should be considered together with any activities, whether they take place within or outside the NCMPA, if they have the potential to reduce access to resources within the NCMPA by flapper skate.[58]

Table 2.2.3 sets out the impact pathways screened in and out of the assessment. Despite the limited justification provided, we are content with underwater noise being the only impact screened in. Our appraisal, as outlined below, considers the two legislative tests relevant to NCMPAs and we consider the proposal is capable of affecting, other than insignificantly, the protected flapper skate feature of the MPA. Advice is therefore provided below on the second test below.

*E.9.2.1 Underwater noise*

[58] https://www.nature.scot/sites/default/files/nature-conservation-mpa/10418/conservation-and-management-advice.pdf



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Table 7.2 considers which impacts would have the potential to hinder each of the 'Conservation Objectives' but omits two of these:

- Ensure flapper skate within the NCMPA are not at significant risk from injury or killing
- Conserve the distribution of flapper skate within the site by avoiding significant disturbance

Overall, we note that little consideration has been given to advice provided within the Conservation and Management Advice document for Loch Sunart to the Sound of Jura NCMPA. However, reviewing the assessment provided we agree there is no significant risk of hindering the Conservation Objectives of the site. We reach this conclusion based on the distance from the WDA to the NCMPA, the low risk of underwater noise to this Group 1 (Popper et al., 2014) species, together with our understanding of site fidelity and the largely resident nature of flapper skate within the site.

**E.10 Report to Inform Appropriate Assessment (RIAA)**

Section 4.2 of the RIAA Part 1 sets out that no European sites designated for fish interests (Annex II species) were advanced through to the RIAA stage. This is consistent with the HRA Screening Report and our advice at the Screening stage.

At Scoping we advised that for diadromous fish species there is limited knowledge of distribution and behaviour of these species in the marine environment and thus it is not possible to carry out an assessment of impacts to diadromous fish to the level required under HRA. As such, we advised that diadromous fish species should be assessed through EIA only and not through HRA. We are content with the Applicants conclusions under EIA that there is no significant impact on diadromous fish.

We note that Section 4 also discusses the Loch Creran SAC and horse mussel beds. The qualifying feature for the Loch Creran SAC is Annex I reefs (including serpulid reefs, horse mussel beds and rocky reefs). This SAC was not considered in Section 4.1 of the RIAA Part 1 which discusses sites designated for Annex I habitats. The rationale for discussion of Loch Creran SAC within Section 4.2 is unclear. However, we do not consider there to be connectivity to the protected features of this SAC from the proposed development and as such we are content that no further assessment is required.


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**NATURESCOT ADVICE ON MACHAIRWIND OFFSHORE WINDFARM**

**Appendix F – Benthic ecology**

Benthic interests are considered in are considered in Chapter 8 (Volume 2) and the following relevant supporting documents:

- Volume 3c, Appendix 8.1: Habitat Assessment Report
- Volume 3c, Appendix 8.2: Benthic Characterisation Report
- Volume 3c, Appendix 8.3: Geophysical and Habitat Interpretative Report
- Volume 3a, Appendix 8: Invasive Non-Native Species Mitigation Plan
- Supporting Documents: Nature Positive Plan

In addition, we note further supporting information provided within the MachairWind WDA Scoping Report, as referenced within the EIA Report but not included within the Technical Appendices:

- Appendix B - Third-Party Benthic Subtidal Survey Interpretive Report - SCOP0057 (Briggs 2024)[59]
- Appendix E - Environmental DNA Survey Interpretative Report - SCOP0057[60]

**The assessment for benthic ecology concludes no significant impacts, both alone and cumulatively, which we support**. In this Appendix, we provide comments and advice which addresses elements of the assessment process but does not affect the outcome of the assessment or the overall conclusion of our advice.

Overall, Chapter 8 would have benefited from additional tables and maps to convey key pieces of information efficiently and concisely. For example, a table of impacts scoped in and out for each phase, a map of projects being scoped into the CEA, and a map with greater detail of survey results. Despite this, we are content that Chapter 8 and supporting appendices provide an appropriate level of detail in relation to our interests.

**F.1 Study area**

The benthic ecology study area has been defined by the maximum tidal excursion[61]. As illustrated in Figure 8.1, the study area encompasses the WDA and a buffer ranging from 4 km to 11 km from the WDA boundary. We are content with this approach, noting the study area has been updated since scoping, as the WDA has been refined and encompasses the Zone of Influence (ZoI) relevant for benthic interests.

**F.2 Baseline characterisation**

Existing desktop and site-specific data have been reviewed to inform the baseline characterisation for benthic ecology. Species and habitats of conservation value have been identified and considered, including Scottish Priority Marine Features (PMFs) and Annex I reef.

*F.2.1 Site-specific surveys*

[59] https://marine.gov.scot/sites/default/files/appendix_b_0.pdf
[60] https://marine.gov.scot/sites/default/files/241001_-_machairwind_-_scop-0057_-_appendix_e_-_environmental_dna_survey_interpretative_report_-_developer_to_md-lot.pdf
[61] As discussed in Chapter 7: Marine Physical Environment.


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As summarised in Table 8.4, data from two benthic surveys has been utilised for baseline characterisation; these site-specific datasets comprise third-party data[62] and project-specific site investigation surveys.

The data collection methods for baseline characterisation generally follow standard methodologies for benthic and environmental sampling, providing a sufficient approach to characterising the baseline environment to inform the EIA.

*F.2.1.1 Ocean quahog*

Section 8.8.1.3 discusses the presence of ocean quahog as recorded within the third-party survey data, in which 13 individuals are recorded (see Scoping Report Appendix B: Third-Party Benthic Subtidal Survey Interpretive Report).

Findings from both the third-party survey and project-specific surveys are illustrated in Figure 8.3. While this map shows the location of sample locations that detected live ocean quahog, little detail is provided in Chapter 8 in relation to life stage of individuals or what the survey method was (e.g. DDV or grab samples). Further detail is instead provided within Appendix 8.2 and Appendix 8.3, however, neither technical appendix contains the information required to easily cross-reference with the samples plotted in Figure 8.3. The technical appendices provide details of a further 17 ocean quahog found within the WDA.

It is acknowledged that the survey data is likely to underrepresent the numbers of quahog within the study area. We are aware that grab sampling typically collects only the top 10-20 cm of sediment and penetration is often reduced in hard sediments. Ocean quahog, particularly adults, may be found deeper in the sediment than this (variable depths from upper few cm to 10 cm+). As such, it is understood that grab sampling is likely to underestimate the number of individual animals present. Additional details, such as those noted above and the quantitative magnitude of loss to the feature for each impact pathway would have been welcomed. However, we are content that the inclusion of this information would not have changed the overall conclusions of the assessment.

*F.2.1.2 eDNA sampling*

Environmental DNA (eDNA) samples were collected during the project's site investigation survey campaign. However, on the basis that there is no available guidance on using eDNA results within an EIA, this has not been considered for baseline characterisation.

The Applicant refers to the Scoping Report Appendix E: Environmental DNA Survey Interpretative Report. Whilst not considered for the baseline, this report was useful to review alongside Appendix 8.2 to see which species were being detected in the area, which supports the species included as receptors within the EIA Report.

Although it is an emerging technique, we consider eDNA sampling and analysis to add value. For example, by improving identification of species difficult to detect using traditional methods including cryptic species and non-native species. For future Applicants, we recommend that

[62] Survey data acquired by the Applicant, from surveys undertaken in 2021 by a third-party and that overlap with the W1 Option Agreement Area.



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inclusion of eDNA sampling is considered, in addition to traditional survey methods, with findings used to help contextualise the baseline information.

**F.3 Assessment approach**

We are content with the approach to assessment for benthic ecology, including the impacts scoped in / out of the EIA.

It is noted in Section 8.10.1.2 that the Applicant has provided sensitivity scores using MarESA[63] along with wider literature. However, for future Applicants we also recommend utilising the Feature Activity Sensitivity Tool (FeAST)[64] to inform the impact assessment and provide further perspective specific to Scotland, where applicable.

Table 8.11 sets out the definition of terms in relation to magnitude used for the assessment. It is noted that the descriptions of magnitude are very similar between negligible and low. The EIA has concluded that nearly all magnitude scores for benthic receptors are negligible, which we disagree with. However, we advise that this does not affect the overall conclusions – further advice is provided below in Section F.4.

**F.4 Impact assessment**

We agree with the Applicant's conclusion of no significant effects for construction, operation and maintenance and decommissioning phases for benthic receptors.

*F.4.1 Magnitude scoring*

As highlighted above, in some instances we conclude different magnitude scores to those assigned by the Applicant. In our view, a magnitude of low would have been more appropriate for the following impacts and receptors, rather than that of negligible as assigned:

| Impact | Receptor | Phase |
|---|---|---|
| Impact 2: Temporary Physical Disturbance / Habitat Loss | Ocean quahog | Construction<br>Operation & Maintenance<br>Decommissioning |
| Impact 3: Introduction of Marine INNS | Offshore circalittoral coarse sediment | Construction<br>Operation & Maintenance<br>Decommissioning |
| Impact 4: Permanent Habitat Loss | Offshore circalittoral sand<br>Offshore circalittoral coarse sediment<br>Echinoderms and crustose communities<br>Ocean quahog | Operation & Maintenance |
| Impact 5: Colonisation of introduced hard structures | Offshore circalittoral sand<br>Offshore circalittoral coarse sediment<br>Ocean quahog | Operation & Maintenance |

[63] https://www.marlin.ac.uk/publications
[64] https://www.nature.scot/professional-advice/protected-areas-and-species/priority-marine-features-scotlands-seas/feature-activity-sensitivity-tool-feast


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This change means that using the significance matrix provided in Table 8.12, for the impacts and receptors highlighted above, the resulting conclusion is moderate rather than minor. However, noting the conservative significance matrix, we are in support of the Applicant's conclusions of not significant for all impacts to benthic ecology receptors, despite our differing magnitude scores.

*F.4.2 Permanent habitat loss & colonisation of hard substrate*

Permanent habitat loss and colonisation of introduced hard substrate have been considered as part of the operation and maintenance phase only, despite these impacts beginning to occur during construction and potentially continuing during and after decommissioning. At scoping, this was accepted as a pragmatic approach given uncertainty around decommissioning; however, we reiterate our expectation that assessment of this impact should be considered further in a decommissioning plan.

*F.4.3 Interactions with Electromagnetic fields (EMF)*

Section 8.11.1.6 discusses potential for impacts to benthic receptors from EMFs from subsea cabling. The total length of cabling proposed within the WDA is approximately 1,044 km, which includes inter-array, offshore substation platform links and offshore export cables. As noted in Paragraph 185 the cable minimum burial depth will be between 0.3 m and 3.0 m but typically between 1.0 and 2.0 m. For any cables buried less than 1.0 m, cable protection will be required, and the Applicant has estimated this to be up to 25 % of the total cable length, as a worst-case scenario. We agree that the risk of exposure to EMF is lower for the buried portions of cable but highlight that a burial depth of 1 – 2 m is preferable.

Given the potential EMF levels and proposed minimum burial depth of 0.3 m, we consider the magnitude should be revised from negligible to low. The Applicant, acknowledging that relatively little is known about the effects of EMFs on marine benthic communities and invertebrates, has assigned a sensitivity score of medium, which we agree with. Therefore, overall the impact is minor and not significant in EIA terms but the revised scoring better reflects our current understanding of this impact.

As our collective understanding of EMF effects remains poor, particularly in relation to in-field measurements of EMF and potential impacts to sensitive receptors. In line with other recently consented offshore wind farm proposals, **we advise that monitoring of EMF should be considered to validate predicted EMF effects.**

**F.5 Cumulative effects**

The cumulative impact pathways for benthic receptors have been identified in Table 8.19, and we support the conclusion of not significant for cumulative impacts.

**F.6 Mitigation**

As all impacts have been assessed as not significant, no additional mitigation measures are proposed beyond the embedded mitigation outlined in Table 8.7, which is largely the production of and adherence to post-consent plans and programmes. These plans themselves do not constitute mitigation, however, we are content that embedded mitigation within them is in line with similar developments, and therefore we accept this.

Where feasible, we recommend that infrastructure such as cable protection and scour protection use materials that consider nature inclusive design aspects and also do not contain any


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contaminants that would be released over time. We welcome the Applicant's consideration and inclusion of a Nature Positive Plan. Should Scottish Ministers grant consent to the proposal, NatureScot can provide further advice on the Nature Positive Plan following refinement post-consent.

*F.6.1 Invasive Non-Native Species Mitigation Plan (M-9)*

The INNS Mitigation Plan (Volume 3a, Appendix 8) includes detail in relation to identifying the risks to the introduction of INNS and proposed control measures.

We are aware that a new report commissioned by the Offshore Wind Directorate regarding '*Invasive non-native species mitigation measures for offshore renewables*' is soon to be published, and we recommend that the Applicant consults this and modifies their Invasive Non-Native Species Mitigation Plan once available.

*F.6.2 Micro-siting (M-14)*

We welcome the embedded measure M-14 which proposes, where practicable, the micro-siting of infrastructure around identified sensitive habitats. Table 8.7 outlines linkages between M-14 and the Development Specification and Layout Plan, noting that an outline version of this plan has not been provided at this stage.

We highlight that consideration of micro-siting is also discussed in the Outline Environmental Management Plan (EMP), however, linkages between M-14 and the Outline EMP are not recognised within Table 8.7. We provide further comment on the Outline EMP below (see F.6.2).

*F.6.3 Outline Environmental Management Plan*

Although the EIA Report raises no concerns of national interest, the Applicant includes a commitment to micro-siting and states that "*the Project has committed to micro-siting of infrastructure, where practicable, around any identified sensitive habitats (including Annex I Reef)*" and outlines that further site-specific surveys and design reviews will be undertaken in accordance with the Outline EMP.

Appendix 6: Outline Environmental Management Plan reiterates this commitment, however, we note some inconsistency in the sensitive habitats referred to, whereby the Outline EMP refers specifically to PMFs and in particular 'Offshore Subtidal Sand and Gravels'.

We advise that the Applicant adjusts this commitment within the Outline EMP in-line with the commitment made in the EIA Report and to encompass both PMFs and Annex I Reef(s).

**F.7 Monitoring**

No monitoring has been proposed in relation to benthic interests, on the basis that all impacts are assessed as not significant.

We understand that the ScotMER project 'A Targeted Approach to Characterising EMF from Subsea Cables and Understanding Potential Impacts on Fish and Benthic Species' is due to report shortly. Recommendations from this report should be considered for inclusion in any relevant cable plans post-consent, where applicable.

In addition, as noted above, we advise that monitoring of EMF should be considered to validate predicted EMF effects.


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### F.8 Report to Inform Marine Protected Area Assessment

As summarised in Section 2 of the Report to Inform Marine Protected Area Assessment, the Applicant concludes that no further assessment of NCMPAs with benthic features is required. This conclusion is consistent with the Nature Conservation Marine Protected Areas Screening Report and in-line with our Scoping advice, in which we advised that benthic features of the NCMPAs considered can be screened out from further assessment.

### F.9 Report to Inform Appropriate Assessment (RIAA)

Section 4 of the RIAA Part 1 sets out that no European sites designated for benthic features (Annex I habitats) were advanced through to the RIAA stage. This is consistent with the HRA Screening Report and our advice at the Screening stage.



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## Appendix G – Blue Carbon

Blue carbon interests are considered in Appendix 19.2 – Blue Carbon Assessment (Volume 3C). In this Appendix we provide advice on the blue carbon assessment and conclusions, we do not provide comment on other elements of the climate change or greenhouse gases assessments.

The assessment for blue carbon concludes **no significant impacts,** which we support.

We recognise that blue carbon assessments are a relatively new element of EIA Reports for proposed marine energy projects. Whilst advice included within this appendix is specific to the proposed MachairWind Offshore Windfarm EIA Report, there are some instances in which we provide comment on aspects of the assessment process which do not affect the outcome of the assessment or the overall conclusions reached in our advice; we hope these comments will be of benefit to future blue carbon assessments.

Furthermore, the biodiversity value and ecosystem functions provided by blue carbon habitats are well understood and afforded protection through a variety of policies. Lastly, there is an increasing need to also recognise the climate change mitigation potential in line with the Blue Carbon Action Plan[65].

### G.1 Study area

The study area is defined as the proposed development boundary, i.e. the WDA only.

In our advice dated 28 January 2026, we advised that the study area defined for blue carbon should be the same as that used for benthic ecology, i.e. based on one spring tidal ellipse. However, reviewing Chapter 8 – Benthic Ecology (Volume 2), we consider that there are unlikely to be any blue carbon habitats with potential impact pathways from the proposed development within the spring tidal ellipse buffer. We therefore accept the study area in this case.

However, we reiterate that for future proposals, the study area should mirror that of benthic ecology. We expect the subsequent ECC EIA to follow the benthic study areas as well as consider coastal habitats (e.g. sand dunes, seagrass, salt marsh, etc.) which may be present, particularly within the intertidal area, and other impact pathways (e.g. increased suspended sediment concentrations) may extend outwith the proposed development boundary.

### G.2 Baseline characterisation

It is noted that many of the key data sources we would recommend for the blue carbon assessment are missing from Table 1.3, noting that some are referenced later in Appendix 19.2, including:

- Daewel, U., Akhtar, N., Christiansen, N., & Schrum, C. (2022). Offshore wind farms are projected to impact primary production and bottom water deoxygenation in the North Sea. Communications Earth and Environment, 3(1), 1–8. https://doi.org/10.1038/s43247-022-00625-0

[65] https://www.gov.scot/publications/scottish-blue-carbon-action-plan/

- Diesing, M., Thorsnes, T., & Rún Bjarnadóttir, L. (2021). Organic carbon densities and accumulation rates in surface sediments of the North Sea and Skagerrak. Biogeosciences, 18(6), 2139–2160. https://doi.org/10.5194/bg-18-2139-2021
- Hunt C, Demšar U, Dove D, Smeaton C, Cooper R and Austin WEN (2020) Quantifying Marine Sedimentary Carbon: A New Spatial Analysis Approach Using Seafloor Acoustics, Imagery, and Ground-Truthing Data in Scotland. *Front. Mar. Sci.* 7:588. https://doi.org/10.3389/fmars.2020.00588
- Turrell, W. R., Austin, W. E. N., Philbrick, S. P., Tilbrook, C., & Kennedy, H. (2023). Clarifying the role of inorganic carbon in blue carbon policy and practice. Marine Policy, 157(October), 105873. https://doi.org/10.1016/j.marpol.2023.105873
- Watson, S. C. L., Somerfield, P. J., Lemasson, A. J., Knights, A. M., Edwards-Jones, A., Nunes, J., … Beaumont, N. J. (2024). The global impact of offshore wind farms on ecosystem services. Ocean and Coastal Management, 249 (September 2023). https://doi.org/10.1016/j.ocecoaman.2024.107023


In this case, this does not affect the outcome of the assessment or the overall conclusions reached in our advice, but we highlight this for future Applicants to be aware of.

**G.3 Assessment approach**

*G.3.1 Sedimentary Blue Carbon*

Section 1.3.3.1.1 discusses the site-specific survey data collected as part of the benthic survey and geophysical surveys and we note that no site-specific carbon data was collected. Instead, Paragraph 27 states that organic carbon content data from Smeaton et al. (2021)[66] was overlain with the location of the proposed development. It would have been useful to collect site-specific carbon content values, either to be used in the assessment directly or for comparison with the literature values used. However, the approach used is acceptable.

Typically, we expect temporary seabed disturbance to be assessed separately to permanent habitat loss. However, the Applicant has combined these impacts in Section 1.5.2.1.2 under 'Blue Carbon Loss'. Further advice is provided in G.4.2 below.

*G.3.2 Impact pathways*

We typically advise that changes in physical processes resulting from the presence of the subsea infrastructure associated with the proposed development are included in an assessment e.g. scour effects, changes in wave / tidal current regimes and resulting effects on sediment transport. It is therefore recommended that future blue carbon assessments should include this as an impact pathway, where relevant, as sediment and associated carbon accumulation may result from the proposed development (Daewel, *et al.*, 2022; Watson *et al.*, 2024). This could be further impacted at decommissioning stage, although the impact is likely to be negligible given relatively low sediment accumulation rates in the North Sea, noting that this does vary spatially (Diesing, Thorsnes, & Bjarnadóttir, 2021).

**G.4 Impact assessment**

[66] Smeaton, C., Hunt, C.A., Turrell, W.R. and Austin, W.E.N. (2021). Sediment type and surficial sedimentary carbon stocks across the United Kingdom's Exclusive Economic Zone and the territorial waters of the Isle of Man and the Channel Islands. https://doi.org/10.7489/12354-1

*G.4.1 Blue carbon habitats – construction and operation & maintenance*

The impact of temporary physical disturbance / habitat loss on blue carbon habitats mirrors the Applicant's conclusions from the benthic ecology assessment, such that the magnitude is considered negligible and the sensitivity medium. However, as stated in our advice in Appendix F, we disagree with the magnitude and consider that a score of low is more appropriate. However, this would not impact the overall significance of the impact, i.e. minor, which is not significant under EIA.

*G.4.2 Sedimentary carbon – construction*

As discussed above, the Applicant has combined temporary seabed disturbance and permanent habitat loss as one impact pathway under "Blue Carbon Loss". It is not appropriate to combine these two distinct impact pathways, primarily because any area assessed within permanent habitat loss should already be included within temporary seabed disturbance. For example, the area for seabed preparation works around one WTG considered under temporary seabed disturbance, should already encapsulate the area considered under permanent habitat loss from the WTG footprint. Thus, combining the impact pathways results in an overestimate of total carbon potentially released.

Moreover, it is unclear how the Applicant has reached a carbon value of 12,772 tonnes in Table 1.13 as 7.2 % (total area of temporary seabed disturbance + permanent habitat loss) of 1,598,753 tonnes (total blue carbon within the entire WDA) is 115,110 tonnes, and not 12,772 tonnes. However, based on experience with previous proposed developments, this figure seems high, and the Applicant's 12,772 tonnes of carbon seems more in line with what we would expect, although it is unclear how this was derived.

Given we cannot replicate the calculations used by the Applicant based on Table 1.13, we are unable to provide our own in-depth re-assessment. We have therefore based our assessment on the figures presented, i.e. 12,772 tonnes of carbon released, which is 46,874 $tCO_2$ equivalent.

**We request clarification as to the calculations used to derive the figure of 12,722 tonnes of carbon, to ensure that it represents the worst-case scenario.**

We consider the magnitude to be negligible due to the footprint of the proposal relative to the total seabed area, and net benefit of displaced greenhouse gas emissions across the operational lifetime.

Regarding sensitivity, we consider that the sedimentary carbon is deemed to be of high vulnerability, low recoverability and high value. This is because sediment accumulation on the seabed can be very low and recovery therefore is slow. As such, we agree with the Applicant's sensitivity scoring of high.

Overall, we conclude a significance of minor, which is not significant in EIA terms.

*G.4.3 Sedimentary carbon – operation & maintenance*

Similar to our advice above for the construction phase, it is unclear how the Applicant has derived the carbon values presented in Table 1.14 and the above clarification request should help address this. However, basing our assessment on the figures presented, i.e. 503 tonnes of carbon released, which is 1,847 $tCO_2$ equivalent, we consider the magnitude to be negligible and the


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sensitivity to be high.  This results in an overall significance of minor, which is not significant in EIA terms.

*G.4.4 Decommissioning*

We agree that for both blue carbon habitats and sedimentary carbon, the overall significance for decommissioning impacts would be negligible, which is not significant in EIA terms.

**G.5 Mitigation and monitoring**

No mitigation or monitoring is proposed for Blue Carbon, which is in line with the conclusions of no significance of effect.



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**NATURESCOT ADVICE ON MACHAIRWIND OFFSHORE WINDFARM**

**Appendix H – Derogation**

The Applicant has submitted a derogation case alongside the s36 and Marine Licence Applications for the proposed MachairWind Offshore Windfarm. This derogation case is provided on a without prejudice basis, and includes the following document:

- Appendix 1, Without Prejudice Guillemot Compensation Plan

We have considered this report and its associated Appendix and provide advice below.

**H.1 Without Prejudice Derogation Case**

This report provides information on the legal framework, policy and guidance; consideration of alternative solutions; Imperative Reasons of Overriding Public Interest (IROPI) used to justify the Proposed Development. A summary of the potential compensation measures is provided in section 6. Additionally, it includes one Appendix, which we have focussed our advice on in line with our remit, as below.

**H.2 Appendix 1 – Without Prejudice Guillemot Compensation Plan**

*H.2.1 Potential requirement for compensation*

Within the assessment provided in the RIAA, the Applicant has reached conclusions of no AEoSI for every site and qualifying species assessed, both proposal alone and in-combination. However, in anticipation that Scottish Ministers may reach a different conclusion, a without prejudice derogation case has been provided for one SPA and a single qualifying species:

- Guillemot at North Colonsay and Western Cliffs SPA

As noted in our advice outlined in Appendix D of this response, we have reached a conclusion of AEoSI for two sites and species, although we acknowledge that at this point, the Appropriate Assessment has yet to be undertaken. We therefore provide advice on the suitability of the proposed measures discussed in Appendix 1 – as is discussed below, we cannot advise on the sufficiency, due to the lack of detail provided.

*H.2.2 Guidance in relation to the identification of potential compensation measures*

The Applicant acknowledges that at the time of writing there was no formal compensation guidance available in Scotland. The Conservation of Habitats and Species (Offshore Wind) (Miscellaneous Amendments) (Scotland) Regulations 2026 was enacted on 25 May 2026 and its associated statutory guidance[67] published on the 06 July 2026. Appendix 1 refers to draft guidance and policy that was available at the time - this has since been updated. We therefore advise that the Applicant reviews both the Scottish Statutory Instrument and the Statutory Guidance in detail, to ensure that further development of their proposed compensation measures comply. In particular, we draw attention to the compensation hierarchy and that progression through the tiers must be sequential, based on appropriate evidence-based justification with due consideration of the availability and greater ecological benefit tests.

[67] https://www.gov.scot/publications/compensating-adverse-effects-offshore-wind-protected-european-sites-scotland-statutory-guidance-2026/



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*H.2.3 Short list of potential compensation measures*

A short-list of potential compensation measures is proposed, comprising:

- Mammalian predator management;
- Reducing anthropogenic disturbance at colonies; and
- Conservation management funding.

The Applicant would prefer to implement one or more of these measures strategically, either through the Scottish Marine Recovery Fund (once established) or through collaboration with other offshore wind developers, although a project-level framework has not been discounted.

For each measure, an indicative early-stage road map is provided. These are very high-level and lack fundamental details such as location, evidence of need, which mammalian species would be targeted for predator management, or which conservation management measure may be most suitable. As such, we cannot determine how effective any of the measures proposed within the short list may be in compensating for mortality predicted from the proposed development or whether the benefit derived from these measures would be sufficient.

Instead, we acknowledge conceptually this provides a useful starting point, that the measures proposed in general do have the potential to provide compensation for those seabird species likely to be impacted and that, in principle, we consider the short list measures are appropriate to be taken forward for further consideration and development.

*H.2.3.1 Mammalian predator management*

*Summary of evidence*

Some evidence is provided to support the predation of seabirds by rats and mink, and as stated by the Applicant, we do not disagree with the general premise that the target seabirds discussed are susceptible to predation.

Assessing site-specific factors will be key to evidencing the need and likely effectiveness of the measure. As yet, none of this information is provided and without baseline monitoring at selected locations to assess seabird colony status and available habitat for colony expansion, along with predator density, distribution and evidence of predation on the target species, it is not possible to evaluate the measure effectively.

*Sufficiency, scale and site selection*

The Applicant has outlined guillemot population responses to previous mammalian predator control programmes to indicate that the compensation requirements for the proposal could be met entirely through this scheme. These data seem reasonable, though whether they will be realistically achievable will depend on the chosen location and methodology.

The report states that before the implementation of an eradication measure, a comprehensive feasibility study must be conducted to confirm that eradication is feasible and sustainable at the chosen location. It also states that proportionate seabird surveys will be conducted at the selected site or sites to establish a baseline against which to measure the impact of the compensation measure. No detail is given of these measures so we cannot advise at this time.


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*Monitoring*

No detail is given for monitoring, other than it will be done and reports will be published annually.

*Example timeline*

It is helpful to have an outline timeline for developing the measure in this section, but this requires further detail.

*H.2.3.2 Reducing anthropogenic disturbance at colonies*

*Summary of evidence*

Some evidence is provided to outline how anthropogenic disturbance reduces productivity in guillemot and ecologically similar species (razorbill and puffin). While we agree in principle, we note that the evidence and justification provided is limited and it will depend on site specific circumstances.

*Sufficiency, scale and site selection*

This section is very high level. The Applicant suggests this measure is likely to be strategically implemented through the Scottish Marine Recovery Fund and that North Colonsay and Western Cliffs SPA is quite remote and unlikely to benefit from a reduction in anthropogenic disturbance. No further detail on how and where this measure might be implemented has been provided so we cannot advise at this time.

*Monitoring*

No detail is given for monitoring further than it will be done and reports will be published annually.

*Example timeline*

It is helpful to have an outline timeline for developing the measure in this section, but this requires further detail.

*H.2.3.3 Conservation management funding*

*Summary of evidence*

Examples of where this measure has been accepted for other offshore wind farms, and long-term conservation management projects with fixed-term funding are given. We agree that this measure is a possible route for compensation subject to further detail.

*Sufficiency, scale and site selection*

This section is very high level. No fundable conservation measures have currently been identified. No further detail on how and where this measure might be implemented has been provided so we cannot advise at this time.

*Monitoring*

No detail is given for monitoring further than it will be done and reports will be published annually.

*Example timeline*



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It is helpful to have an outline timeline for developing the measure in this section, but this requires further detail.



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# National Parks Wildlife Service

| | |
|---|---|
| **From:** | Housing Manager DAU |
| **To:** | MD Marine Renewables |
| **Cc:** | **[Redacted]** |
| **Subject:** | RE: MD-00012385/ MD-00012386 - MachairWind Limited – MachairWind Offshore Wind Farm – Windfarm Development Area - EIA Section 36 consent and Marine Licence Applications Consultation Started |
| **Date:** | 17 August 2026 15:55:19 |
| **Attachments:** | image001.png<br>image002.png<br>image004.png |

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Good afternoon,

Further to the below email I wish to confirm that this Department will not be issuing a response to this consultation.

Kind Regards
**[Redacted]**

—

**[Redacted]**
Executive Officer
—
**Aonad na nIarratas ar Fhorbairt**
*Development Applications Unit*
**Oifigí an Rialtais**
*Government Offices*
**Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman Y35 AP90**
Newtown Road, Wexford, County Wexford Y35 AP90
—

# Natural England

Date: 21 July 2026
Our ref: 551986
Your ref: MD-00012385 / MD-00012386

Scottish Government,
Victoria Quay,
Edinburgh,
EH6 6QQ

**BY EMAIL ONLY**

Tyneside House
Skinnerburn Road
Newcastle-upon-Tyne
NE4 7RA

T 0300 060 3900

Dear Marine Directorate

**MACHAIR WINDFARM**
**Location:** West of Colonsay

Full application

Thank you for seeking our advice on the application in your consultation which we received on 25 June 2026.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

The advice contained within this letter is provided by Natural England, which is the statutory nature conservation body within English territorial waters (0-12 nautical miles). As the application is located in Scottish waters, advice from NatureScot, the statutory nature conservation body in Scotland should be sought.

Having considered the location and scale of the Machair windfarm, we conclude that the project is unlikely to significantly impact any species from English designated sites or waters. We do not expect a requirement to provide further comments or advice on this project unless the project changes substantially.

For any queries relating to the specific advice in this letter only please contact me using the details below. For any new consultations, or to provide further information on this consultation please send your correspondence to consultations@naturalengland.org.uk.

Yours sincerely

Northumbria Marine Team
E-mail: planconsareateamnorthumbria@defra.gov.uk

# Natural Resource Wales

Cyfoeth Naturiol Cymru
Natural Resources Wales

Eich cyf/Your ref: MD-00012385/ MD-00012386
Ein cyf/Our ref: AOS-26075-0001

Natural Resources Wales
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Licensing Operations Team, Marine Directorate
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AB11 9DB

Ebost/Email: MD.MarineRenewables@gov.scot

Dyddiad/Date: 31/07/2026

Annwyl/Dear Sir/Madam,

**CONSULTATION: MachairWind Offshore Wind Farm**

**APPLICANT: MachairWind Limited**

**EICH CYFEIRNOD / YOUR REFERENCE: MD-00012385/ MD-00012386**

**EIN CYFEIRNOD / OUR REFERENCE: AOS-26075-0001**

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales (NRW) on the above application to construct and operate the MachairWind Offshore Wind Farm.

Considering the location of the MachairWind Offshore Wind Farm, NRW Advisory (NRW (A)) conclude that the project is unlikely to significantly impact Welsh designated sites and we have taken the decision to not provide detailed advice on this application at this stage. Accordingly, we defer to NatureScot as the Statutory Nature Conservation Body (SNCB) for Scotland.

Please do not hesitate to contact marine.advice@cyfoethnaturiolcymru.gov.uk should you require any further clarification.

Yn gywir / Yours sincerely,

**[Redacted]**

**[Redacted]**

Senior Marine Advisory Officer
Marine Area Advice and Management Team
Natural Resources Wales.

# Northern Lighthouse Board

Northern Lighthouse Board

84 George Street
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Website: www.nlb.org.uk
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Your Ref: MachairWind OWF – S36 Consent & ML Application
Our Ref: AL/OPS/ML/WIND_030_26

Licensing Operations Team – Marine Directorate
Scottish Government
Marine Laboratory
Aberdeen
AB11 9DB

30 July 2026

***ELECTRICITY ACT 1989***
*The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017*
*The Electricity (Applications for Consent) Regulations 1990*

***MARINE AND COASTAL ACCESS ACT 2009***
*The Marine Works (Environmental Impact Assessment) Regulations 2007*

***Application for Consent Under Section 36 of the Electricity Act 1989 and Part 4 of the Marine (Scotland) Act 2010 to Construct and Operate the MachairWind Offshore Wind Farm, located off the west coast of Scotland, northwest of Islay and west of Colonsay***

Thank you for your e-mail correspondence dated 25th June 2026 relating to the application submitted by **MachairWind Ltd** for consent to develop and operate the MachairWind Offshore Wind Farm, located off the west coast of Scotland, northwest of Islay and west of Colonsay.

Northern Lighthouse Board note that the MachairWind OWF will consist of up to 144 fixed-bottom Wind Turbine Generators (WTG) with an approximate export capacity of up to 2GW. A maximum of two Offshore Substation Platforms (OSP) will be located within the array, with an onshore grid connection expected at a landfall location near Girvan, South Ayrshire. It is noted that there will be up to four HVDC offshore export cables.

NLB have reviewed the documentation associated with the application, with particular reference to the navigational safety elements, including cumulative impacts, of the application contained within Chapter 13 (Shipping & Navigation) and Chapter 15 (Military & Civil Aviation). NLB also recognise the inclusion of the various technical appendices, including Appendix 12: Outline Lighting & Marking Plan, Appendix 13.1: Navigational Risk Assessment (NRA), and Appendix 15.2: Dubh Artach Lighthouse Technical Note.

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To find out more, please see our Privacy Notice at www.nlb.org.uk/legal-notices/

NLB note the hazards identified through the Navigational Risk Assessment (NRA) process, and the associated embedded mitigations detailed within Table 17.1 of the NRA. NLB also acknowledge the inclusion of Embedded Mitigation M49 (Dubh Artach Setback Distance), which was agreed with NLB in earlier consultations.

The inclusion of Outline Post-Consent Documentation such as the Outline Lighting & Marking Plan (LMP) and Outline Vessel Management Plan and Navigational Safety Plan (VMP&NSP) is welcomed.

Within the Outline Lighting & Marking Plan, NLB acknowledge the inclusion of Section 6 (Maintenance of AtoN), and the commitment to undertake remote monitoring of AtoN on buoyage during the construction phase, and of WTG AtoN during the O&M phase. NLB also welcome the commitment that general maintenance will be undertaken to ensure functionality of the AtoN is maintained and optimised.

Within Section 6 (Maintenance of Aids to Navigation) of the Outline Lighting & Marking Plan, NLB request inclusion of the following text:

> "NLB will conduct regular audits of MachairWind Ltd for their provision of Aids to Navigation, as established by the Merchant Shipping Act 1995, and the Northern Lighthouse Board's position as the General Lighthouse Authority for Scotland and the Isle of Man. NLB request that a record of annual AtoN maintenance and testing is kept for auditing purposes."

NLB request that Sections 7.1 (Loss of Aids to Navigation) and 7.2 (Guard Vessel Trigger Points) of the Outline LMP are reworded to include the following:

> "In the event of a significant AtoN outage, notification will be provided to the Northern Lighthouse Board (navigation@nlb.org.uk / 08000 326655) and the NLB AtoN Reporting Portal at http://nlb.org.uk/latonsonline, the UK Hydrographic Office (using form H102 via admiralty.co.uk/H-note) and the local HM Coastguard (zoneXXX@hmcg.gov.uk).
>
> Notifications to local marine stakeholders shall also be made by Notice to Mariners and the Kingfisher Safety Bulletin scheme. In the event of a failure which may lead to a significant risk to navigational safety, additional temporary risk mitigation measures will be considered following consultation with the NLB and MCA, including the use of a guard vessel, until such time as the AtoN has been repaired or replaced."

NLB also acknowledge the commitment to engage with NLB with regard to a significant failure of AtoN, and potential mitigations including the deployment of a guard vessel**.** NLB request that Section 7.2 – Point 3 is amended to read "loss of station of any navigational buoy, including significant delay (greater than 72 hours) to it being restored".

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NLB also request that Section 7.1 (Loss of Aid to Navigation) of the Outline Lighting & Marking Plan contains reference to Section 3 of the MachairWind OWF Vessel Management and Navigational Safety Plan, and the relevant procedures for the promulgation of Local Notices to Mariners and Radio Navigational Warnings in the event of an Aid to Navigation failure.

The establishment, alteration and discontinuation of any Aid to Navigation is subject to the Statutory Sanction of the Commissioners of Northern Lighthouses. Further guidance and application forms can be obtained on request from the NLB Navigation Department (navigation@nlb.org.uk).

As is noted throughout the application, Northern Lighthouse Board operate a number of significant Aids to Navigation within the vicinity of the MachairWind array area. NLB will monitor the impact of the development on AtoN provision within the area, and will continue to engage closely with the applicant to deconflict any operations across the lifespan of the project, and ensure that safety of navigation is maintained throughout the area.

Northern Lighthouse Board do not anticipate that the MachairWind project will negatively impact the delivery of NLB's statutory obligations as the General Lighthouse Authority for Scotland and the Isle of Man.

Northern Lighthouse Board have no objection to the proposed MachairWind OWF, and will continue to engage with the applicant with regard to the development of post-consent navigational safety documentation.

Yours sincerely
**[Redacted]**

**[Redacted]**
Navigation Manager

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# SEPA

| | |
|---|---|
| **From:** | Planning.North |
| **To:** | MD Marine Renewables |
| **Subject:** | PCS-20009244 SEPA response to MD-00012385/ MD-00012386 |
| **Date:** | 26 June 2026 09:41:44 |
| **Attachments:** | image.png |

To Whom It May Concern,

Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017
MD-00012385/ MD-00012386 - MachairWind Offshore Wind Farm, Located off the west coast of Scotland, northwest of Islay and west of Colonsay

Thank you for the above consultation. Based on the information provided, this application appears to fall below the thresholds that SEPA provide site specific advice for. We recommend that you refer to SEPA standing advice for the Department for Business, Energy and Industrial Strategy and Marine Scotland on marine consultations. You should also refer to our wider standing advice and other guidance, which is available on our website at www.sepa.org.uk/environment/land/planning/.

If there is a significant site-specific issue that is not addressed by our guidance or other information available on our website, and on which you would like our advice, please reconsult us clearly highlighting the issue in question and we will do our best to assist.

from

**[Redacted]**

Senior Planning Officer

Scottish Environment Protection Agency
Buidheann Dìon Àrainneachd na h-Alba

For the future of our environment

Disclaimer
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Dh'fhaodadh gum bi am fiosrachadh sa phost-d seo agus ceanglachan sam bith a tha na chois dìomhair, agus cha bu chòir am fiosrachadh a bhith air a chleachdadh le neach sam bith ach an luchd-faighinn a bha còir am fiosrachadh fhaighinn. Chan fhaod neach sam bith eile cothrom fhaighinn air an fhiosrachadh a tha sa phost-d no a tha an cois a' phuist-d, chan fhaod iad lethbhreac a dhèanamh dheth no a chleachdadh arithist. Mura h-ann dhuibhse a tha am post-d seo, feuch gun inns sibh dhuinn sa bhad le bhith cur post-d gu postmaster@sepa.org.uk. Togalach Aonghais Mhic a' Ghobhainn, 6 Craobhraid Parklands, Eurocentral, Baile a' Chuilinn, Siorrachd Lannraig a Tuath, ML1

4WQ. Faodar conaltradh còmhla ri SEPA a sgrùdadh no a chlàradh no a sgaoileadh gus obrachadh èifeachdach an t-siostaim a ghlèidheadh agus airson adhbharan laghail eile.