

Objection to the applications made by MachairWind Ltd for consent under Section 36 of the Electricity Act 1989 and for the associated Marine Licenses under Part 4 of the Marine (Scotland) Act 2010 in respect of the proposed MachairWind Offshore Windfarm (Marine Directorate references 00012385/00012386).

INTRODUCTION

In the Planning Statement for the Machair Wind Farm application case reference 00012385 to the Marine Directorate, Section 6.2.4 'Visual Environment', it concludes:

*'...the significant adverse effects on the qualities for which the area has been designated are **outweighed by the social, environmental and economic benefits of national importance which would be delivered by the Project.**'*

Likewise under Section 6.2.5 'Cultural Environment', it concludes:

*'As no effects arising through change to setting have been assessed as higher than a medium magnitude of impact, it is therefore clear that **substantial harm would not arise to any designated heritage assets**'*

What it is important to check, is in the light of Iona's spiritual and cultural national and **world** importance, **has the island been fairly assessed and scored in the EIA documentation, against the relevant Scottish Planning Policies, such that the Planning Statement can draw these conclusions?**

1. POLICY CONTEXT

Historic Environment Policy for Scotland (HEPS): Issued by Historic Environment Scotland (HES), this document sets out core policies (such as Policy HEP4), which explicitly demand that **any detrimental impact to an asset and its context must be identified, minimised, and managed:**

'Changes to specific assets and their context should be managed in a way that protects the historic environment. Opportunities for enhancement should be identified where appropriate.

'If detrimental impact on the historic environment is unavoidable, it should be minimised. Steps should be taken to demonstrate that alternatives have been explored, and mitigation measures should be put in place.'

National Framework Policy 4 (NFP4) and in particular, NFP4 Policy 7 (Historic Assets and Places). Policy 7h explicitly dictates that development proposals affecting scheduled monuments will only be supported where:

- i. **direct impacts on the scheduled monument are avoided;**
- ii. **significant adverse impacts on the integrity of the setting of a scheduled monument are avoided; or**

- iii. *exceptional circumstances have been demonstrated to justify the impact on a scheduled monument and its setting and impacts on the monument or its setting have been minimised.*

Scotland's National Marine Plan (NMP) and in particular Policy GEN 6 section 4.23
Designated heritage assets – representing sites of national or international significance for which statutory requirements apply.

'Designated assets should be protected in situ within an appropriate setting. Substantial loss or harm to designated assets should be exceptional and should only be permitted if this is necessary.'

2. ANALYSIS OF THE PLANNING STATEMENT

The Planning Statement in Section 6.2.4.2.3 states:

*178: As for the nationally and locally designated landscapes above, it is the LCTs and CCAs in closest proximity to the WDA that were predicted to experience significant adverse effects. Major adverse effects were identified on LCTs across Colonsay, Oronsay and northwest Islay, with effects reducing to **moderate adverse significance on Iona**, the Rinn of Islay and the south and west coast of the Ross of Mull.*

They are clear that there are effects on the island of Iona's setting determined as 'moderate adverse.' They go on as follows in their conclusions about the impact on particular visual receptors.

*179: Similarly, effects on visual receptors at identified viewpoints or at settlements and travelling on routes were of major adverse significance at the closest locations to the Project (VP14 Colonsay, VP13 Oronsay, VP 1, 2, 3, 4 northwest Islay), **with effects reducing to moderate adverse at a greater distance from the WDA or from elevated positions on Islay (VP5 and 7), Colonsay (VP9, 15 and 16), Jura (VP10), Mull (VP20 and 21) and Iona (VP22)***

This scoring outcome (moderate adverse) determined specific to Iona is for the setting of the Abbey and Nunnery, the Conservation Area and the approach route from Fionnphort to the island. They conclude from these assessments that:

*'Whilst the relevant policies do not reference effects on these receptors, the nationally significant beneficial effects of the Project and its contribution to achieving Scotland's offshore wind ambition, net zero and decarbonisation targets **outweigh the identified significant effects.***

This means that the scale of detrimental impact to Iona and its listed buildings is not of such substance as to outweigh the economic and social advantages of the development. They acknowledge the adverse impacts ('harm') but say that only limited areas are subject to major adverse effects and that Iona is not amongst these in any case

*'The Project would give rise to some **limited major adverse** effects on SLVIA receptors. However, major adverse effects are not experienced at the most sensitive nationally-designated landscapes. Effects at the Jura NSA were identified on relatively few aspects/locations within a small subset of SLQs for which the area is designated, and it is **therefore demonstrated that the overall integrity of the area will not be compromised.***

Crucially they conclude and reiterate that any detrimental impact is outweighed by the project benefits.

*'In addition, the significant adverse effects on the qualities for which the area has been designated are **outweighed by the social, environmental and economic benefits of national importance** which would be delivered by the Project. Further detail on the balance between the identified significant effects and the Project's social, environmental and economic benefits is set out in Section 7.'*

Should however the EIA scoring be proved to be incorrectly assessed then there may be a case for reconsideration of the Planning Statement conclusions, that is, is the detrimental impact caused greater than anticipated such that the conclusions might be altered?

3. ASSESSMENT OF DETRIMENTAL IMPACT TO A HERITAGE ASSET

In Section 6.2.5.2 'Planning Assessment Conclusions for Cultural Environment' of the Planning Statement, (paragraphs 186 to 194) expands on how the threshold of detrimental impact is considered:

'GEN 6 of the NMP states "Development and use of the marine environment should protect and, where appropriate, enhance heritage assets in a manner proportionate to their significance.

*Paragraph 4.23 of the NMP goes on to state "...] Designated heritage assets - representing sites of national or international significance for which statutory requirements apply. Designated assets should be protected in situ within an appropriate setting. Substantial loss or **harm** to designated assets should be exceptional and should only be permitted if this is necessary to deliver social, economic or environmental benefits that outweigh the harm or loss [...]". **The policy requirement is therefore to avoid substantial loss or harm.***

How 'harm' to, or detrimental impact on, the heritage asset is defined is therefore important. The planning statement goes on to determine how detrimental impact is defined and recurses to legal case to support its position. It states:

*189 **Harm** to heritage assets is a policy concept that has been little used in Scotland, but has been the subject of extensive consideration in England, and there is a body of guidance and case law that provides useful context for its discussion, and makes it clear*

that substantial harm presents a high bar.

The planning statement is correct in that case law in England does set a high bar based on case history. However Scottish Law is different. While English case law sets a high bar, Scottish planning law operates under a distinct framework. The submission incorrectly applies an English legal test to a Scottish planning context, where it holds no material weight or binding authority. The applicant's assessment of heritage impacts relies on English High Court precedents—specifically *Bedford Borough Council v SSCLG* and its subsequent updates. In the English planning context, these cases dictate that harm to a heritage asset is only 'substantial' if its significance is entirely 'drained away' or 'vitiating.'

However, this baseline is not applicable to the MachairWind application for the following reasons:

- **No Binding Precedent:** English High Court decisions are not binding authorities in Scotland. The Scottish planning system is separate, governed by its own primary legislation and national policy framework.
- **Policy Misalignment:** The distinct English categorization of heritage impacts into binary thresholds ('Substantial Harm' versus 'Less than Substantial Harm') does not exist within Scottish planning policy. By framing the assessment around this specific English legal threshold, the submission does not align with the statutory requirements of Scottish planning law.

4. EIA ASSESSMENT: EIAR

The Planning Statement goes on to clarify that detrimental impact ('harm' as the applicant states) can only be assessed dependent on an independent assessment - in this case the EIA:

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

Examination of the EIAR, in particular Chapter 14 and its Appendix 14 provided by the applicant, therefore needs to be undertaken to check that all the relevant criteria have been assessed and a fair and reasonable assessment of impacts has been determined such that the Planning Statement is correct in stating:

191 As no effects arising through change to setting have been assessed as higher than a medium magnitude of impact, it is therefore clear that substantial harm would not arise to any designated heritage assets.

Given the outcome of these assessment conclusions showing that impacts are not above a threshold, the Planning Statement concludes that the statutory requirements have been met.

Therefore, the relevant requirements of the NMP are met and the consenting applications accord with policy GEN 6.

This of course depends on the EIA assessment having considered all the criteria fairly and reasonably.

5. ADVERSE IMPACT IN THE SCOTTISH PLANNING POLICY CONTEXT

Given that the 'high' legal bar for adverse impact to a Heritage Asset, as asserted by the applicant, does not exist in the Scottish Planning Context, the Planning Statement does offer a more conciliatory reading:

'190 cont. Chapter 14 Offshore Archaeology and Cultural Heritage of the EIAR defines a high adverse impact as where 'key elements of the asset's fabric and/or setting are lost or fundamentally altered, such that the asset's cultural significance is lost or severely compromised.

*'While this represents a relatively coarse banding of magnitudes of impact up to and including total loss of a heritage asset, this is a **useful lower threshold for harms that could be considered to be substantial** and which would require consideration under this policy.*

'NPF4 refers to the concept of integrity of setting defined by HES as "changes to factors of setting that contribute to cultural significance such that understanding, appreciation and experience of an assets are not adequately retained will affect the integrity of setting".'

What is not made clear is that in Scotland heritage impact must be assessed against Policy 7 (Historic Assets and Places) of NPF4. Policy 7 critically **does not require an asset's significance to be completely destroyed ("vitiating") before an application can be refused.**

Instead, NPF4 Policy 7c explicitly mandates that development proposals affecting a listed building or its setting will only be supported if they "preserve its character, special architectural or historic interest."

The question to be determined by examination of the EIAR is how the insertion of 91nr, 340-metre-tall wind turbines into the open seascape that forms the historic and spiritual backdrop of Iona and the link back to Ireland, does not breach the threshold of concern regarding how the development directly affects the ability to "preserve" its setting.

In the Planning Statement's view, Chapter 14 and Appendix 14 assessments confirm that the threshold of concern is not breached and *'the fundamental relationship between these assets and their surroundings, with historical, functional and cultural links to the sea, and the landscapes surrounding the Scheduled Monuments remain in essence unchanged'*. This is not an accurate assessment.

This statement shows the importance of checking and determining whether, as per the scoring conclusion of the EIAR, that there are, as the Planning Statement is concluding, '(193) *No adverse effects to integrity of setting therefore relate to a **fundamental** shift in the relationship of an asset*

in its surroundings that would arise through loss or radical change to fundamental elements of that setting.'

The Planning Statement suggests an acceptable balance is achieved because the historic and cultural settings remain visible despite the scale and proximity of the Windfarm. In practice, however, these settings cannot be separated from the visual impact of the development. The applicant is effectively asking the Marine Directorate to accept that the historical asset can still be appreciated, despite its setting being significantly altered and compromised by the project.

193 cont In addition, the perceptual prominence of the assets remains over the WDA infrastructure. While there would be, in some cases, a reduction in the perceived remoteness or expression of dominance, these characteristics would remain legible and understandable to a viewer and their ability to appreciate the contribution of those characteristics to the asset would remain.

The final conclusion confirms the stance of the Planning Statement, which based on the EIA Chapter 14 and Appendix 14 assessments, no threshold is crossed.

*As such, given that the thresholds in relation to substantial **harm** are not met, it is therefore also concluded that the integrity of setting would not be significantly affected.*

It is the criteria that lead to this conclusion contained within Chapters 14 and Appendix that requires to be checked against Policy HEP4.

It explicitly demands that **any detrimental impact to an asset and its context must be identified, minimised, and managed – not simply accepted as tarnished.**

6. HERITAGE PROTECTION IN SCOTLAND

Under the Historic Environment Policy for Scotland (HEPS), heritage protection is balanced through carrying out a qualitative assessment of an asset's "cultural significance" and its relationship with its environment.

Historic Environment Scotland's Managing Change guidance defines setting as the way in which the surroundings of a historic asset or place provide its context, experience, and understanding.

In this case the open, uninterrupted western and southern seascapes are intrinsic to how Iona has been experienced for centuries as a place of isolation, pilgrimage, and spiritual reflection. The industrialisation of this horizon will directly affect that setting.

HES referred the applicant to the EIA handbook in their various consultations. The opening section of the handbook summarises the assessment criteria:

6. 7. The simplest definition of "Landscape" is "the appearance of the land". Landscape is everywhere and may comprise rural landscape, urban landscape (or townscape), urban

fringe landscape, coastal landscape, seascape, etc.

However, human perceptions of place also include things that cannot be seen but which add to the appreciation of places; these are:

a. feelings generated by other senses – touch, hearing, smell, taste;

b. feelings generated by a knowledge of the place (its cultural and historical associations with people, events, etc.);

c. feelings generated by past experience of the place, or similar places – life experience.

6.8: These combine to give an experience of landscape perceived by all the senses – sight, sound, smell, touch, taste – and by knowledge.

Two of the three factors that make up a landscape are mental not physical that is 1) 'knowledge' and 2) 'past and life experience'.

The following assessment reviews how the application submission Appendix 14.3 assesses these two significant criteria in relation to Iona.

HES (13/06//25) refer to their 'Managing Change: Setting (2020) document. HES are recorded by the applicant in 14.3 as saying that (with suggested grammatical corrections in brackets)

'highlighted that impacts that (make) change to a setting that effects the way an asset is understood appreciated and experienced(,) then the integrity of the setting is affected' .

HES in their scoping discussion with the applicant (9/01/25) are recorded as stating that;

'On the basis of the information provided to date, it is likely that the proposed windfarm would impact the setting of a number of scheduled monuments.'

Assessing that impact fairly and responsibly is the role of the EIAR.

7. APPLICANT'S ACCEPTED VISUAL IMPACT OF TURBINES

The applicant states that their wind turbines (WTG) **will disturb and alter the setting of the Historic Asset**. In their Appendix 14.3 they say as much and many times. Here is a selection:

*The nearest WTG will be located c.24 km from St. Mary's Abbey. The ZTV (Figure 8), visualisations (Figure 9, Figure 10 and Figure 11), and site walkover all indicate that the **presence of the WTGs would represent a discernible change to the setting of St. Mary's Abbey**. The visibility of the WTGs would be greatest on the east side of the scheduled area (towards the foreshore) with the WTGs falling away as the viewer moves westward towards the Abbey.*

Views across the core of the site from Tigh-an-Easbuig and represented by Viewpoint CH & (Figure 11), which was moved to the eastwards from Tigh-an-Easbuig to provide clearer visibility of the proposed WTGs across an approximate 10-degree arc of view. **In these views there would be a degree of juxtaposition of the WTGs with the Abbey,**

Views across the core of the site from Tigh-an-Easbuig and represented by Viewpoint CH & (Figure 11), which was moved to the eastwards from Tigh-an-Easbuig to provide **clearer visibility of the proposed WTGs across an approximate 10-degree arc of view.** In these views there would be a degree of juxtaposition of the WTGs with the Abbey, but most of the array would be obscured by the Abbey itself, which would remain the dominant element in these views.

The WTGs would be visible from St. Columba's Shrine (Figure 21). In this view, they would, however, be largely screened by the higher ground to the west and south-west of the Abbey and by Iona Village; **in these views the WTGs would be seen** against a horizon broken by the intervening buildings and trees.

A photomontage was captured from Cladh an Disert (Figure 23) which may represent the site of a small chapel and burial site and contains a carved rock known as 'Columba's Table' at the request of HES. **While some WTGs will be seen from this location, the dominant feature is the Abbey** due to its scale and prominence, and the nature of the view upwards towards the abbey, which emphasises its scale and solidity against the horizon. The WTGs would appear as background features...

Views across St Oran's Chapel and between the Abbey complex and Martyr's Bay along and to the east of the Sraid nam Marbh (Street of the Dead) are illustrated in viewpoint CH7 (Figure 10). **This viewpoint offers possibly the clearest visibility of the WTGs from within the scheduled area, and the WTGs would appear in an approximate 12 degree arc of view.**

The WTGs would appear as background features in general views along Iona sound and more generally out to sea, a view which is already **disrupted by Iona village,** the ferry and associated harbour works. (Note: The use of the applicant's word 'disrupted' in relation to intrinsically integrated elements of the Iona experience, the village, is entirely inappropriate. The rotating turbines will disrupt the long held view, what will not disrupt the view are those elements that make up the experience of that established view.)

The applicant is unequivocal, the setting of specific listed monuments on Iona will change, By their own statements, the proposed development fails NFP4 Policy 7 (Historic Assets and Places) because it explicitly dictates that development proposals affecting scheduled monuments will **only be supported** where direct adverse impacts on the monument are avoided, and "significant adverse impacts on the integrity of setting of a scheduled monument are avoided".

8. SEA SETTING OF IONA

HES raise a bigger question though and that is, it is not only the visual effect of the turbines on the listed monuments but the whole setting of Iona which is at stake within which the listed monuments sit. They say (9/01/25) that there is concern for those monuments;

'In particular, those that are early Christian and that often depend on a sense of place and isolation derived from being set on the edges of landforms and a relationship with the wide open sea. At this early stage, it is not possible to establish whether the severity of these impacts would likely raise issues of national importance such that we might object. The EIA Report should fully assess these, including wireframes and/or photomontages, where appropriate.'

In other words the EIAR (based on the handbook advice) in addition to visualisations, should therefore seriously review the 'knowledge' of the Christian origins of the setting and the relationship of the coastal edge and sea in its making, not just the physical visual reality. At the same time the EIA report should explore the '**experience**' of that setting in particular its 'sense of place' and 'isolation' both then and now.

They continue:

'Particular attention should be given to monuments that have a known visual relationship with the sea that contributes substantively to their cultural significance and where changes as a result of the proposed development might result in significant effects.'

'Without prejudging future assessment, it is likely to be those sites that contain components of monastic or early Christian occupation that have the greatest potential for a significant adverse impact on their settings. Some cluster around fertile land and sheltered bays and are often associated with earlier high-status farmsteads such as mediaeval sites where Christianity was promoted by the elite, for example Nave Island, monastic site, Viking house, chapel, burial ground, settlement and kelp-burning kiln (SM3233). Others are in more isolated locations and occasionally inserted into the remains of brochs and other Iron Age sites. The most evocative, often those ascribed with the most spiritual associations by modern communities, exploit an isolated location, deliberately chosen to enhance the sense of occupying a monastic 'retreat, a place physically and visually cut off from the rest of the world.'

'Their sense of place derives from being 'on-the-edge, exposure to the sea and a level of perceived wildness. A large number of turbines present within outward views of the sea from these sites is likely to represent a significant alteration to their settings.'

HES are clear in the case of Iona that the 'knowledge' of the origins of Iona's development as a Christian settlement, accessed and built from the sea and lived as a Christian settlement on the sea is fundamental to its understanding.

But HES seeks to bring that history up to date, by saying that not only the 'knowledge' of that locational choice but also the 'experience' of that sense of detachment from the rest of the world

was a conscious act of their religious leadership. That the feeling of being alone at the limits of the then settled world tested the communities collective resolve and faith. To this end the sea horizon and wildness (and one imagines days of calm) where the weather met the land are crucial in that mix of creating for want of better words an ambience or atmosphere that supported the celebration of their beliefs.

But HES do not limit their assessment to long gone history, they associate it with our *'experience'* now as modern communities and the importance for those communities captured in the idea of being spiritually exposed to *'an isolated location, deliberately chosen to enhance the sense of occupying a monastic 'retreat,'*

In HES's view the *'knowledge'* of that essence of Iona's location and setting which was shaped historically, still has significant value today.

It is accepted that it is hard for us with all the benefits of modern life to imagine living on this precarious edge, but we are fortunate to have written evidence of what it was like.

There has been a remarkable literary survivor of that age that informs us of the issues addressed by HES. The 9th Abbott of Iona, Adomnan (d 704AD) wrote three books on the 'Life of Saint Columba' that document the conditions they lived under and the inextricable connection between land and sea. A word of caution for modern readers, each book is a series of 'parables' and we have to be careful in this context not to bring our modern perceptions to a world where you didn't know the next day's weather, what the seasons might bring, whether crops would grow what neighbouring communities might be thinking and doing. In that chaos, stability was found in the hope of a divine guide hence the style of Adomnan's book. A selection of quotes from his book shows the inextricable link between the island and the sea.

Book 1 Chapter 4

'Once in Iona, one day of crashing storm and exceptionally high waves.....the boat for which the brethren were waiting arrived as the saint foretold.....by God's gift a marvellous line kept them apart, so that they had not felt the storm though, they said they could see it far off'.

1/19

'My son, you must be very careful today. Do not try to go directly across the open sea to Tiree, but instead take the roundabout route by the Treshnish Islands. Otherwise you may be terrified by a monster (whale) of the deep and find yourself scarcely able to escape'

2/12

'Once, when St Columba was at sea, he found himself threatened by danger. A great storm, with gusts of wind blowing from all sides, arose and his boat was tossed and buffeted by great waves.'

2/13

'On another occasion St Columba's companions called on him during a wild and dangerous storm that he should pray to the Lord for them.'

But how should we understand the sea in relation to Iona? We will now consider that.

9. IONA AS AN ISLAND

A comment from the applicant in Appendix 14.3 underlines a disconnect regarding the relationship between the island of Iona, its historic monuments, and its maritime landscape. The historic assets and the surrounding sea are inextricably linked. The applicant states:

*'Views towards Iona and across the Sound of Iona on the ferry journey from Fionnphort would again be minimally affected as demonstrated by Figure 20. **In this view a greater proportion of the WTGs would be visible, however, there would be a 130-degree arc of separation between the nearest WTG and the Abbey** (Figure 20b and Figure 20c). During the ferry crossing to Iona the viewers attention in these views is generally toward the Abbey as the focal point of the pilgrimage, **and the view out into the ocean is read by the viewer as a different space to that occupied by the Abbey.**'*

In essence, the applicant argues that because the windfarm and the Abbey sit 130 degrees apart, a visitor can simply look toward the Abbey and ignore the development. This logic assumes that human perception can artificially compartmentalise the landscape, treating the ocean and the island as entirely separate, unrelated spaces rather than a single, unified historic environment.

In Planning terms the island is seen as a whole, a statutory APQ - An Area of Panoramic Quality - but looking back in history it has been seen as a whole entity. Richard Sharpe the translator of Adomnan's 'Life of Saint Columba', says '*The role in which St Columba seems particularly a Scottish saint is as the missionary who converted the Picts north of the mountains. This is the part that Bede gave him*'. He goes on to quote Bede (d 735AD and seen as the 'Father of English History):

*A priest and abbot named Columba, distinguished by his monastic habit and life, came from Ireland to Britain to preach the word of God in the provinces of the northern Picts, which are separated from those of the southern Picts by a range of steep and desolate mountains. ... Columba arrived in Britain in the ninth year of the reign of the powerful Pictish king, Bridei f. Meilochon; he converted that people to the faith of Christ by his preaching and example, **and received from them the island of Iona on which to found a monastery.** (Bede, III 4)*

From the very beginning the monastery and island were seen as one. Richard Sharpe confirms this 'whole' island Abbey view when he writes:

*'Adomnán several times speaks of Iona as **'our island'** and once as **'this our principal island'** (I 1). It is clear that in his own day, when the saint was invoked to bring an end to the drought (II 44), the cultivation of the island was in the hands of the monastery. His stories of the monks' working in the fields at the machair suggest that he believed this was so in Columba's time. The monastery itself was situated on the east side of the island, looking out across the Sound to the Ross of Mull. There is no doubt that it was on the*

raised beach of cultivable land where the abbey stands today.'

We are fortunate to have Adomnan's record for he confirms the sense that the island land was worked for the benefit of the monastery:

1/37

....For once the brethren were returning to the monastery after a day's work on the harvest. They had reached the place called Cúl Eilne, which is reckoned to be the halfway point between the machair on the west side of Iona and our monastery.....

2/28

One day of early summer, shortly before he passed to the Lord, St Columba went by cart to visit those brethren at work building a stone wall around the machair on the west coast of Iona.

3/16

*Likewise, on another occasion, when St Columba was living in Iona, he addressed the assembled brethren, making his point with great emphasis, saying;
"Today I shall go to the machair on the west coast of **our island**, and I wish to go alone.*

No one is to follow me therefore. They obeyed and he set out alone as he desired. But one of the brethren, who was an artful scout, took a different route and hid himself on the top of a little hill that overlooks the machair, for he was eager to find out why the saint had gone out alone. From his vantage point, he could see St Columba standing on a knoll among the fields and praying with his arms spread out towards heaven and his eyes gazing upwards.

The applicant in his Appendix 14.3 takes a much narrower perspective for their assessment essentially the listed precincts, except that they widen it to include the route as experienced from Fionnphort. What we have seen is that a broader view **is required**, but for the whole island. That the historical research and consequent imaging of the Machair Wind Farm need to be investigated island wide, not just the limited zone identified.

10. DALRIADA AND THE LINK TO THE NORTHERN IRELAND

The understanding of role of the sea is important to HES for other reasons, and this comes up again in HES guidance to the applicant specifically with reference to St Mary's Abbey;

St Mary's Abbey, Iona, monastic settlement (SM12968) comprises the remains of the large early historic monastic settlement founded by St Columba in AD 563, now occupied by restored medieval buildings associated with the Benedictine Abbey of St Mary founded around AD 1200. It is the birthplace of Scottish Christianity and internationally renowned for its surroundings and spiritual associations. It was easily reached by Columba and his followers from Ireland by sea and sits at the crux in linking Ireland with western Scotland. Although exploiting a sense of remoteness, its coastal location resembles that of many other monastic sites at a time when the sea would have been the main communication

route allowing movement around a network of monastic communities. Its setting includes characteristics of that isolation, its relationship to the sea and the links across to Ireland but also extends to encompass the rest of the island and the complex of other sites across it which are associated with St Columba and the monastery's later history. Key outward views from the monastery include those looking towards Ireland, reciprocal views along the Street of the Dead, views and other associated links between the abbey, nunnery, Martyr's Bay and many other related chapels, crosses and other sites across the island. The links between this interrelated group of sites combine to create Iona's setting, and all include a relationship along the coast and out across the sea.

HES thus reassert the importance of the sea and the sense of isolation it engenders in relation specifically to the Abbey. That isolation is not a statement of being lost to the world. The sea was the navigation channel of the islands and most importantly the connection to Ireland, Saint Columba's and subsequent brethren's roots. Adomnan asserts that very clearly in his 'Life of Saint Columba':

1/12

"...My dear sons, why do you gossip idly about these kings? For both of those you mention were recently killed by their enemies, and their heads cut off. Sailors will arrive today from Ireland and tell you this.'...

1/18

.....This man will accompany you for the few days you are travelling in Ireland, and when you return to us here, he will come with you. God has chosen him, and he will live out life here in my monastery.'...

2/14

Once, the same St Cainnech forgot to take his staff with him when he set sail from the harbour of Iona on his way to Ireland...

2/39

Once, during the period when St Columba lived in Iona, a layman who had only lately assumed the clerical habit crossed by sea from Ireland to the blessed man's island monastery.

Ireland and particularly the north was not only Saint Columba's base but also the anchoring civilisation of the west coast archipelago of Dalriada and the sea was the connective 'tissue' that bound it together and it is in that context that HES write in their initial comments that 'It is possible that the proposed turbines may be visible within these views and could diminish Iona's sense of isolation and its relationship with the sea.'

The concern for this well-established historically, connection between Iona and Ireland is repeatedly raised in further commentary from HES. Their recorded Preliminary Screening comments HES (28/04/25) state on the basis of early wireline drawings that:

'The proposed development would be likely to result in a substantial alteration to the baseline setting of the monument as the sense of place and views across the sea towards

Ireland would be compromised. It is not possible to establish from the wireline alone whether the severity of this impact would likely raise issues of national importance such that we would object.'

And then again HES (12/12/25) reiterate to the applicant:

'HES confirmed that at present all sites are experienced from land and connectivity is done through land, however for these sites, specifically those which reference Northern Ireland, the sea should be considered as the highway of connectivity between all sites, the Applicant should be assessing what the seascape means in relation to monastic components.'

11. THE 'WHOLE ISLAND' APPROACH

If we take the 'whole island' approach then the impact of the southerly stretch of industrial turbines is seen as it will be perceived, not as a narrowly framed sequence of views around the Abbey but an expansive stretch across the southern horizon. Just as the island was experienced in Saint Columba's time, so it is today with visitors and pilgrims reaching all parts across the island. Saint Columba's bay is in the south a very popular destination and it is there and from the surrounding hills which are well walked that the clear southern aspect towards Ireland will be most mentally obstructed by the phalanx of turbines in the sea.

The applicant writes:

'Tor an Aba also affords views in an arc from north through east to southwest, including a view down the channel in the general direction of Ireland and into the open sea beyond. There is no visibility of Ireland, which reflects the possibly apocryphal story that Columba chose Iona as the first landfall out of sight of Ireland, giving a sense of a view back towards a past that was once but is no more. In this sense there is no direct sightline, but the sense of another place beyond the horizon becomes significant.'

The EIA handbook recommended to be used by HES and which the applicant has said they have used identifies 'knowledge' of a setting as a prerequisite of an assessment. The idea that Columba is inferred to believe he was leaving a past is a nonsensical reading of that historical knowledge. It would be as ridiculous as saying that in a commute from Edinburgh to Glasgow, each time I leave my past behind.

The source of the 'apocryphal' story does not bear up with historical evidence. If as the greatest historian of that age 'The Bede' in his history stated;

*'A priest and abbot named Columba, distinguished by his monastic habit and life, came from Ireland to Britain to preach the word of God in the provinces of the northern Picts, which are separated from those of the southern Picts by a range of steep and desolate mountains. ... Columba arrived in Britain in the ninth year of the reign of the powerful Pictish king, Bridei f. Meilochon; **he converted that people to the faith of Christ by his preaching and example, and received from them the island of Iona on which to found a***

monastery. (Bede, III 4)

Britain at that time was a highly politicised society not in our democratic terms, but a society in which 'biblical law' was being adopted across the land. Columba's landing was not a 'Columbus discovery of America moment', that is an historical mash up completely at odds with the records. According to the most reliable scholar of his time, Columba was 'given' Iona, he did not 'choose' it. The sequence of Columba's to and froing in this political sphere is known only in fragments but in no way supports such an historical understanding.

The applicant's impact assessment underestimates the historical connections between Saint Columba and Ireland, creating an incomplete picture of both past and present cultural 'experience' as defined by the EIA handbook. Historical records, such as Adomnan's accounts, demonstrate that the sea between Ireland and the islands functioned as a dynamic, bidirectional 'highway of activity' (HES 12/12/25).

2/45

On the first of these, pine trees and oaks had been felled and dragged overland. Some were to be used in the making of a longship, and besides ships' timbers there were also beams for a great house to be brought here to Iona...

The second time was several years later. Again, oak trees were being towed by a group of twelve currachs from the mouth of the River Shiel to be used here in repairs to the monastery...

12. THE BIG PICTURE

Amongst the concluding comments of Appendix 14.3 the applicant states erroneously:

*While the WTGs would be visible on the horizon in views back towards Ireland, as **Ireland cannot be seen from Iona**, this view is a symbolic manifestation of connectivity rather than a tangible or physical link that can be quantified.*

Geographically Ireland **can be seen** from Iona, from the top of Dun 1. But Dun 1 is important in much broader ways. HES allude to that.

HES is recorded to have advised as follows (20/02/26):

Wider views across the island can be obtained from the summit of Dùn I; these contribute greatly to an appreciation of the monument's sense of place, as well as communicating more specific aspects such as the monument's relationship with Columba's Bay in the south of the island.

HES confirms a 'whole island' perspective be taken, that the island mental map is founded on a sense of St Columba's presence hence their citing of the view towards Columba's Bay.

There is evidence of St Columba climbing Dun 1 in Adomnan's 'Life of St Columba':

1/30

Once the saint was sitting at the top of the hill that overlooks our monastery from a little distance, when he turned to his servant Diarmait and said:

I wonder why it is taking so long for a ship coming from Ireland to get here. It brings a very learned man who has fallen into wrongdoing but will soon come here to perform a fearful penance.'

The connection back to Ireland re-emerges. And it does again in another passage, in the context of St Columba regularly climbing Dun 1, which can be inferred from the following historical record:

2/4

Once again while St Columba was living in Iona, as he sat on the low hill of Dùn Las he saw a heavy storm-cloud to the north rising from the sea on a clear day. Watching as the cloud rose, Columba turned to one of his monks sitting beside him, a man called Silnán mac Nemaídon, whose people were the moccu Sogin, and said:

"This cloud will bring great harm to people and livestock, Today it will pass over here and tonight it will shed a deadly rain over that part of Ireland between the River Delvin and Dublin,...

In all likelihood Dun 1' was a regularly used high point of Columba's 'whole' island platform for teaching and preaching. Columba's teaching platform can be nicely understood by using HES's reference to (12/12/25) the beehive cell concept of understanding a setting (point corrected to make sense).

*'HES provided an example of the **beehive cell** component and the importance of (not) ignoring the land behind and looking more at liminality of the site and highlighted that this component has not come through in the setting assessment so far.'*

That is you cannot understand the bees and their hive detached from the eco system that supports them. So similarly, Iona cannot be understood without understanding Columba and his 'whole' island, and as HES state the 'contemporary' communities that live 'happily' with that legacy.

13. THE DALRIADAN ARCHIPELAGO

That Columban eco system is much wider however than the island and the immediate sea that surrounds it. It would be quite within reason and normal to imagine Columba climbing Dun 1 with his fellow brethren, to a high point for a physical connection to 'his Lord above' and to the 360-degree expanse of their Christian Mission. The sense of the archipelago he served is captured in Adomnan's texts:

1/12

Once when he was travelling through the rough and rocky district of Ardnamurchan...

2/11

Once, when St Columba spent some time in the land of the Picts...

2/14

Cainnech had reached the southern part of Islay.....

2/15

So it happened that on one and the same day two men, parting from one another in peace, travelled under full sail with a following wind - Baithene in the morning to Tiree, Colmán after noon beginning his voyage to Ireland.

2/22

Just as the saint had said, it brought a great squall of wind, which, finding the robber and his loot in the open sea between Mull and Coll, at once stirred up the waves and sank their boat.

2/24

Once, when St Columba was living in the island of Hinba,...

2/41

Once when St Columba stayed as a guest in Rathlin Island,...

Adomnan's text reveals that archipelago as an interconnected 360-degree world of open horizons with seaborne activity, trade, transportation as well as fishing and hunting. There is no doubt that this bustle of activity would have been under constant observation from the island high point.

It is that 360 degree panorama that the vast wind farm will occupy a large proportion of that view. It will add nothing to the legacy of 1500 years of history of the Christian settlement of Iona, its Abbey and Precincts, the island setting, its sea surrounding it and the horizons of the archipelago of islands.

The Machair Windfarm will, from the point of departure to Iona from Fionnphort, be a presence in the 'new experience' of the island of Iona. Where now eyes conceptualise Iona as a 'whole' in its open setting, in the future there will be this new pervading presence of turning turbines across miles of the southerly horizon.

The EIAR infers that the presence of the windfarm can be mentally compartmentalised 'out' and implies ways of doing it:

- Walk towards the Abbey but do not look back.
- Use a soft-focus effect to bring the foreground into sharp relief, letting the background blur into obscurity.
- Mentally chop out the wedges of vistas that reveal the windfarm.

But 'experience' is not like that. Lived experience is a dynamic constantly evolving moving photo or like a film of looking, turning and absorbing, whilst applying your 'knowledge' to understand what you are seeing. The 91 turbines cannot simply be compartmentalised and erased.

14. ALTERNATIVE SITE SELECTION

Consider the case of the turbine development sited, for instance, west of the island beyond the Skerryvore Lighthouse at a distance similar to the offshore wind farms on Scotland's east coast.

This is an important scenario because the issue is not the idea of a **remote** windfarm at sea. Most people don't have a problem with that - subject to safeguarding of wildlife and seabed. The issue is the location of the Machair windfarm so close inshore with all the consequential adverse impacts on the neighbouring islands that the **proximity** brings.

In this alternative location for the turbine development, upon arriving in Fionnphort, you would see Iona perfectly framed by its southern, eastern, and northern waters, surrounded by its archipelago. The unobstructed, empty horizon looking towards Ireland would remain untouched. In this scenario, you would only spot the wind turbines when traveling directly out to the development, or from the far west coast of Iona.

In this alternative location, the turbines' looming, dominance over Iona's seascape would disappear into the Atlantic horizon. The important historical south horizon of Ireland, Colonsay, Islay and Jura would remain unaltered as would the northern horizon of Tiree, Coll, Ulva, the Treshnish Isles and Staffa.

So why would this alternative site selection not be a logical solution?

It would appear, as the Planning Statement states in 2.2,(22) in its 'Refinements to the Wind Development Area', that a key criteria is to 'avoid water depths greater than 60m.'

The application document 'Chapter 4 Site Selection and Alternatives' states that:

*The W1 POA is also one of the few ScotWind POAs that is suitable for fixed-bottom turbine foundation technology. Such foundation technology has been proven to be technically viable at scale in the UK and worldwide, with all major commercial offshore windfarms in UK waters (including East Anglia ONE, TWO and THREE which were developed by ScottishPower Renewables (SPR)) using such technology. **This is in comparison to the majority of other ScotWind POAs, which are located in deeper waters than the W1 POA and therefore depend on floating turbine foundation...***

However, contrary to the above assertion, SPR have in fact submitted a Section 36 Planning Application to the Marine Directorate for a 3GW offshore floating turbine development called MarramWind. It is therefore well within the capability of SPR to locate the Machair Windfarm remote from Iona and SPR cannot claim they are technically restricted by the 60m depth limit for fixed seabed turbine to locate it in such close proximity to Iona.

Therefore, these adverse impacts which are fully acknowledged by the applicant, and caused by the selected site being so proximate to Iona, do not need to be accepted and '*outweighed by the social, environmental and economic benefits of national importance*' of the development as the applicant claims because it is feasible for the development to be built further offshore using floating technology.

Furthermore, there is entirely no need for any adverse impacts on Iona from a turbine development because it is not technically necessary for it to be in this location.

15. THE IMPORTANCE OF IONA TO THE WESTERN WORLD

The applicant repeatedly cites 'the national importance' of their proposed development. That has to be seen in the context of '**the importance of Iona to the Western world.**'

As Professor Jonathan Burnside, Professor of Biblical Law, University of Bristol Law School, states:

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

16. REFLECTION ON POLICY CONTEXT

Looking back at the relevant policies and assessing their criteria:

Policy HEP4 which explicitly demands that **any detrimental impact to an asset and its context must be identified, minimised, and managed:**

'Changes to specific assets and their context should be managed in a way that protects the historic environment. Opportunities for enhancement should be identified where appropriate.

'If detrimental impact on the historic environment is unavoidable, it should be minimised. Steps should be taken to demonstrate that alternatives have been explored, and mitigation measures should be put in place.'

The application whilst fully acknowledging that the Machair Windfarm will adversely impact the heritage asset of Iona Abbey and its island context, fails to enhance the assets, fails to minimise the impact because the only way to minimise the adverse impact would be to build the Machair Windfarm on a site more remote to Iona than the application site.

National Framework Policy 4 (NFP4) and in particular, NFP4 Policy 7 (Historic Assets and Places). Policy 7h explicitly dictates that development proposals affecting scheduled monuments will only be supported where:

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

The application's direct and significant adverse impacts are fully acknowledged in the application documents and are not avoided. No exceptional circumstances have been demonstrated to justify the adverse impact on the heritage assets or their settings which could be avoided by building the Machair Windfarm on a site remote to Iona.

Scotland's National Marine Plan (NMP) and in particular Policy GEN 6 section 4.23 *Designated heritage assets* – representing sites of national or international significance for which statutory requirements apply.

'Designated assets should be protected in situ within an appropriate setting. Substantial loss or harm to designated assets should be exceptional and should only be permitted if this is necessary.'

The designated assets' setting, which protects the heritage assets, has not been protected by the very proximity of the selected site to Iona. Building Machair Windfarm on this particular site is not necessary when it could be constructed on a more remote location.

17. EIA SCORING

It is hard to reconcile some of the scores attributed in the EIAR assessment had a deeper analysis 'knowledge' of Iona as a setting and a subtle place of 'experience' been carried out. The above has clearly shown that the examination of Iona's importance by the applicant is wanting, and as a result provides an inadequate basis to carry out a proper assessment. In the technical summary of the whole submission it states under 7.9 (180):

1. ***There will be no physical impacts to designated terrestrial heritage assets identified in the assessment. However, it is recognised that during operation of the Project, changes to the setting of these designated heritage assets will occur due to the presence of the WTGs in the seascape resulting in moderate to major changes (significant in EIA terms) to the following designated heritage assets for the WDA alone***

and combined with the Offshore ECC and onshore transmission assets, based on available information:

- *Dubh Artach Lighthouse (Listed Building);*
- *Oronsay Priory and Cross (Scheduled Monument);*
- *Beinn a' Chaisteil, promontory fort and associated remains, Islay (Scheduled Monument);*
- *Dun Bheolain, fort, Islay (Scheduled Monument);*
- ***St Mary's Abbey, Iona, monastic settlement (Scheduled Monument);***
- ***Iona Abbey (Listed Building); and***
- ***Iona (Conservation Area)***

The statement that there are "no physical impacts to designated terrestrial heritage assets" relies on a narrow definition of harm that contradicts Scottish planning frameworks. In Scotland, an asset does not need to suffer physical destruction to experience harm; impacts on its setting and cultural context are equally significant. While the physical structures on Iona remain untouched, the setting of these heritage assets will be substantially impacted.

The applicant acknowledges that moderate to major changes will take place, yet relies on the application of English legal principles to justify these impacts within a Scottish jurisdiction.

What follows is the applicant's list of affected designated assets. The table fails to reflect the true historical significance of the Iona assets, which are relegated to the bottom despite being foundational to Western cultural development across Scotland, Britain, and Europe. Just as Stonehenge would rarely be positioned last in such a context, Iona's paramount importance in the historical narrative demands greater, and appropriate, recognition.

The applicant's list is fundamentally disrespectful. It appears to be based on a '*quantifiable*' criterion (applicant's terminology) - distance from the development. If the historical and 'cultural' examination had been carried out thoroughly with that '*knowledge and experience*' (as per the HES EIA handbook) of the designated settings and the island 'as a whole' rather than as a compartmentalised citation, the EIAR technical summary might more appropriately have stated:

1a

Changes to the setting of designated heritage assets, and their context, of National, British, Irish and European importance.

- **St Mary's Abbey (Scheduled Monument), Iona Abbey (Listed Building), Iona (Conservation Area) and the island of Iona as a monastic settlement.**

1b

Changes to the setting of designated heritage assets, and their context, of National importance.

- Dubh Artach Lighthouse (Listed Building);
- Oronsay Priory and Cross (Scheduled Monument);
- Beinn a' Chaisteil, promontory fort and associated remains, Islay (Scheduled Monument);
- Dun Bheolain, fort, Islay (Scheduled Monument);

By contrast, the applicant has dedicated just one paragraph, Paragraph 180, in the technical summary to the heritage assets, and their context, of Iona. In doing so, the applicant has failed to acknowledge the fundamental importance of Iona and its heritage assets to Western culture.

Furthermore, the Iona Abbey and its context is entirely underplayed in a startling statement from the applicant's EIAR:

6.2.1 Iona Abbey (L12310)

*In terms of the effects on the Category A listed building Iona Abbey (LB12310), these are assessed the same as the corresponding SM (see Section 1.6.1.5), while the **Abbey church** would remain the dominant element in all views of the asset and would very much retain its imposing physical and spiritual presence in the asset group, the juxtaposition of turbines with the asset **would detract to a degree**. Therefore, the magnitude of change is assessed as low adverse, resulting in a moderate adverse significance of effect, which is significant in EIA terms.*

Throughout the EIAR the applicant states that the turbine arrays will be visible and provides evidence of this visibility by way of imagery in the Appendix 16.4 (SLVIA) and Chapter 14.3 Settings Assessment, Appendix 14.3. Given the historic significance of the setting, they state that the turbine development would **detract** but **'to a degree'**, inferring that the 'degree' is minimal – an incorrect conclusion that is repeated throughout the documentation.

By contrast, all the applicant's submitted images demonstrate an all-pervading presence of the turbine development. To state that they 'detract to a degree' thereby inferring that 'degree' is minimal, is not accurate. These static photo images of the turbines do not convey what the eye will see in reality. The eye sees objects in much greater detail than these images portray and therefore in reality, the wind turbines will appear much more visible than as portrayed (some of the turbines are even blurred in the imagery). Furthermore, these images do not convey the reality that these turbines will be constantly mechanically moving – further highlighting the physical intrusion on a currently empty horizon.

Setting aside, for a moment, the paucity of the historical examination of the applicant's EIAR, the *Matrix For Evaluating The Significance Of An Effect* Table 5.1 (pt 77 of the Technical Summary) indicates **'low adverse'** change by the development on Iona heritage assets which is inaccurate and we challenge that assessment. Photographs in the EIAR are a useful measure of the extent of visual impact - albeit they are not in a worst case scenario because in some of the imagery, the turbines are blurred whereas in reality they may be seen with crystal clarity.

The EIAR in juxtaposed foreground/ background views, deems and interprets the historical asset, the Abbey, as diverting a viewer's attention away from the backdrop of the turbine development such that the adverse impact will not be noticeable. However, HES states that it is necessary to take into account *'knowledge of the place (its cultural and historical associations with people, events etc), feelings generated by past experience of the place or similar places – life experience'* and in the case of the Abbey and the Island of Iona, that is the knowledge that the place is an ancient spiritual place founded by St Columba, the birthplace of Christianity in Scotland, set in splendid isolation against empty horizons. With that 'knowledge,' the perceived adverse impact on the Abbey and Iona wrought by the occupation of a vast industrial development, constantly in

motion, on those empty but resplendent horizons **will in fact be intensified**. Therefore, in this context, **the adverse impact is not 'low' but 'high'**.

A comparative analysis of heritage settings demonstrates this principle. Consider a theoretical scenario involving a proposed wind energy development situated 12 miles from a monument of immense historical importance, such as Stonehenge. The juxtaposition of this ancient Neolithic monument with a vast array of modern industrial infrastructure would create a severe visual clash.

Because cultural context profoundly influences visual perception, the introduction of industrial-scale development within the setting of an anchoring national monument would result in an unacceptable adverse visual impact. Therefore, assigning a "low" visual significance score to such a proposal would fail to recognise the fundamental incompatibility between modern utility structures and iconic heritage assets.

Likewise, the Abbey and its setting of Iona are of National, British and European significance and enjoy worldwide interest. So here we would have another pre-industrial setting of huge significance (Iona an anchoring monument of Britain's and the national historical timeline as with Stonehenge) set against a modern utility seen as a horizon of dynamic steel turbines. Therefore the applicant's adverse magnitude score for just the scheduled Monument, Iona Abbey and Iona Conservation Area in their *Matrix For Evaluating The Significance Of An Effect* Table 5.1 of 'low adverse magnitude' is irrational.

We believe that the EIAR should include an assessment of the **whole of Iona as well as the scheduled Monument, Iona Abbey and Iona Conservation Area**. Given the National, British and European historical and cultural importance of Iona and its Abbey we believe that such an assessment is reasonable and appropriate and that the adverse magnitude score is likely to be a **'high adverse magnitude'**.

Put it the other way, if Iona Community Council had been carrying out the EIAR, with our deep 'knowledge' we would have started with an adverse magnitude score of 'high adverse impact'. So, what would bring that score down to a 'low adverse impact' when it is, as HES state, *'knowledge of the place (its cultural and historical associations with people, events etc), feelings generated by past experience of the place or similar places – life experience'* that affect the perceived adverse impact? Nothing can bring that score down.

The adverse magnitude score for *Matrix For Evaluating The Significance Of An Effect* Table 5.1 is very important. A 'low adverse impact' taken together with a 'high' sensitivity results in a 'moderate' significance of effect (technical summary 77. Table 5.1) which allows the applicant to state in that point of the summary that **'...in general, effects which are of major or moderate significance are considered to be significant in EIA terms, although it is possible that a conclusion of moderate effect significance may not be considered significant'**.

Simply assessing the adverse magnitude score as 'medium adverse impact' in Table 5.1 makes the significance of effect 'major,' in which case there is **no opportunity to change the significance of effect**.

If, as we believe, the adverse magnitude score in Table 5.1 was **'high adverse impact'** makes the **significance of effect 'major' and there is no opportunity to change the significance of effect**.

What this means is that by carrying out an inadequate assessment which fails to assess the whole of Iona and additionally fails to correctly assess the scheduled Monument, Iona Abbey and Iona Conservation Area in accordance with HES, the applicant's EIA underscores and then dilutes the significance of the adverse impact to the point where the irrational conclusion is in 1.6.2.3.5 (332-333):

The focus of the CA is St. Mary's Abbey and while the WTGs would be visible as a background element of views of it, it would remain the visually dominant focal point of views.

The presence of the WTGs in the distant seascape would not detract from those aspects key outlined in Section 1.6.3.1.1 which contribute to its cultural significance.

*As a result, distant visibility of the WTGs, the change to setting would be of **low adverse magnitude** which for an asset of high importance **will give rise to a moderate adverse effect to cultural significance which would be significant in EIA terms.***

The significance of the heritage assets have been known about as far back as the **2013 Strategic Environmental Assessment (SEA) of the Plans for Offshore Wind, Wave and Tidal Energy in Scottish Territorial Waters.**

In this 2013 document, under the site designation reference OWW1 (roughly equating with the current Machair Windfarm) it identified under Historic Environment, Impact on Setting of Historic Environment as being of a **medium risk**.

Indeed that report thought it important to specifically highlight two historic settings: Skerryvore Light House, Tiree and Iona Abbey:

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

In the summary of SEA recommendations, it advised under Table 6.4: Assessment of the Plans against SEA Objectives:

To avoid adverse effects on the character and setting of historic sites and buildings.

More specifically on this point, SEA recommendations stated:

It identified historic features to avoid at the project level, recommending the avoidance of significant effects on key features of the historic environment in the siting of offshore developments.

Summarising the documents position 7.2.6 on *Historic Environment*, concern for the heritage assets are amplified:

*However, there are also more generic effects relating to **potential impacts on the setting of historic features** and undesignated marine features, such as some wrecks. The following mitigation has therefore been identified.*

*Project level assessments should consider the **potential impacts on the setting of sites and seek to mitigate accordingly to minimise any such effects.***

SEA's 7.3 Regional Recommendations for Draft Plan Options, West 7.3.21, confirms the role of the EIA process in relation to the historic environment:

7.3.21 The region contains many designated coastal features of importance to the historic environment. **The potential for impacts on the setting of these features should be considered through the EIA process and it should be demonstrated that adverse effects are avoided or minimised.**

In 2013, thirteen years ago, it was clear that **Iona's heritage assets and their island context**, was a significant issue. It was clear in the SEA of 2013 that adverse impacts were to be avoided or minimised with specific reference to Iona Abbey and, by implication, its context.

Ultimately, the EIAR's conclusions underestimate the overall visual impact because the underlying assessment relies on a limited historical analysis and prioritizes static photomontages over the dynamic, lived reality of human visual perception in this landscape.

To suggest that placing towering industrial machinery in the backdrop of one of Western Europe's oldest and most sacred island landscapes will diminish Iona's cultural and spiritual significance only "to a degree" is a fallacy that fails both EIA standards and common sense.

The applicant's conclusions of a 'low adverse magnitude' ignores the relentless, industrial motion of massive offshore turbines that will irrefutably draw the eye and irrevocably alter the resplendent emptiness of the historic Atlantic horizon. To conclude in the applicant's *Matrix For Evaluating The Significance Of An Effect (Table 5.1)* that the significance of effect will be '**moderate adverse**' when no mitigation has been carried out is irrational.

The 2013 SEA of the Plans for Offshore Wind, Wave and Tidal Energy in Scottish Territorial Waters, remains the primary advisory framework and yet the applicant has failed to address its stated concerns with regard to the '**avoidance of significant effects on key features of the historic environment in the siting of offshore developments**' and if any are found '**to mitigate accordingly to minimise any such effects**'.

The 2013 SEA stated clearly that it was incumbent on the EIA for each project that the '**The potential for impacts on the setting of these features should be considered through the EIA process and it should be demonstrated that adverse effects are avoided or minimised**'. This resulting Machair Windfarm EIA has singularly failed to show how adverse effects have been avoided, minimised or in any way mitigated. The fact is, they can't be.

18. CONCLUSION

In conclusion, there is no mitigation that can lessen the wholly unnecessary adverse impacts on the heritage assets and their context, short of not building the development in this location.

The 20 or so page Appendix 14.3 response to HES questions on the '*knowledge*' of Iona's 1500-year history skims the surface of Iona's deep legacy to our Scottish culture given the thousands of pages in the submission. In the final Chapter 7 of the Planning Statement under 'Planning Balance and Conclusions', Jura is mentioned four times and Colonsay once. Iona is not mentioned at all.

There is a disconnect between the depth of known history of Iona and how it is sketchily summarised by the applicant and interpreted in the EIAR as summed up in final paragraph of the applicant text on the Iona Abbey setting, which is repeated here.

*While the WTGs would be visible on the horizon in views back towards Ireland, as Ireland cannot be seen from Iona, this view is a **symbolic manifestation of connectivity** rather than a tangible or physical link that can be **quantified**.*

The EIAR on the Abbey ends with a trivialising of an entire cultural understanding of the root of Western Christianity on this coastline and a secular demand for quantifiable criteria, when in fact the EIA handbook clearly states that other factors, '*knowledge*' and '*experience*' need to be taken into account.

There is however one clearly quantifiable observation that can be drawn and which should be a significant factor in the determination of this planning application: amidst all the off-shore windfarms being built off Scotland;

There is only One Iona.

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