

GIGHA COMMUNITY COUNCIL - Machair Windfarm proposal comments

Marine Directorate Reference 00012385 and 00012386

Gigha Community Council is constituted under Part IV of the Local Government (Scotland) Act 1973. Its statutory remit is to represent the views of the residents in the Gigha community it serves. We have consulted islanders and summarise responses in the following submission.

Gigha Community Council wishes to object to the proposal within the applications of made by MachairWind Limited for consent under section 36 of the Electricity Act 1989, and for associated marine licences under Part 4 of the Marine (Scotland) Act 2010, to develop and operate the MachairWind 'Offshore' Wind Farm north-west of Islay and west of Colonsay (Marine Directorate references 00012385 and 00012386), as submitted on 25 June 2026.

Our primary challenge is on the basis of 'need'.

We strongly dispute the presumption of seemingly unlimited renewables expansion in Scotland to seek to allegedly meet commitments made under the 2015 Paris agreement in principle, and particularly any need for the present proposals (Marine Directorate references 00012385 and 00012386)

Currently 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 Prof 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.

For example, Scotland's 'average' electricity winter consumption is 5.7GW but there are now 5.3GW of new demand for AI and hyperscale computer centres in various stages of the planning pipeline. There are currently 8 (+) applications for AI/computer centres in the M74 corridor south of Glasgow, for which there is no current electricity supply, and, in total, 17 hyperscale data centres are reported to be in development at some stage in Scotland.

Those Scottish AI centres in planning already compromise Paris targets for net zero, as well as being heavy water consumers.

There is no strategic energy and resource planning of any merit that could conceivably permit this scale of very high energy and resource consumption whilst intending or expecting to meet the current

2°C 2100 targets. This lack of overall strategic planning and subsequent management, for both supply and demand targets prevents effective net zero accounting.

Projections by the Energy Department are that UK electricity demand will increase by 10% per annum until 2030, 50% by 2035 and then double by 2050.

This growth alone will prevent the binding Paris agreement climate change targets being met unless offset by parallel reductions in fossil fuel energy consumption.

Without comprehensive demand management strategies and development planning, all further renewables increases do is add capacity, not reduce fossil fuel consumption or improve overall demand or energy efficiency.

Machair very clearly represents considerable over development of inshore marine wind.

Section 6.2.4 'Visual Environment' in the Planning Statement of the Machair proposal to the Marine Directorate, notes:

'...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.'

The developer clearly recognises both the magnitude and significance of adverse impacts but wrongly concludes that developing this site is necessary. It is not.

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.

Scotland already has installed wind power capacity of 18GW+, so more than 3x our winter domestic electricity demand of 5.7GW.

In 2024 38.4 TWh of renewable electricity was generated in Scotland.

National electricity consumption was 21.8 TWh.

We already have a considerable export market and Scotland is obviously able to absorb its own national electricity market growth: annual increases in renewables generation have run at approximately 10% pa. 2022-24.

With another 80GW of supply projects already in the planning pipeline at September 2025, then there is evidently no need whatsoever to develop marine wind in Argyll at all.

Scotland's rural land and remote seascapes are under a continual development threat as 21stC industrial sites despite their natural resource, scenic and cultural values, with no clear and obvious threshold for over-development stated or set in national planning strategies.

Marine locations for wind turbine developments are the new Scottish 'extractive' industry with power predominantly for export then requiring additional extensive transmission developments. As markets are hundreds of kilometres from generating sites additional generating capacity is required to cover transmission losses, thereby increasing the scale of development sites.

The 2GW capacity proposed at Machair west of Colonsay would be the largest marine scheme in Scotland, double the previous marine sited project, and sufficient to cover the domestic electricity demand for the whole of Wales with some mW to spare.

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.

NO LOCAL ECONOMIC BENEFITS AND NO COMPENSATION

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.

For this proposal, a scale of community payments of £10m pa. would even fail to compensate for turnover loss from a 10% falloff in overnight tourism in Argyll's adjacent Inner Hebrides, (given Argyll's quoted 2022-4 average annual overnight revenue of £160m plus), let alone any decline in the day visitor segment.

The financial damage to the island economies of Colonsay, Iona, Mull, Tiree and Islay of even a 10% impact on visitor numbers or visitor spend, both overnight and day visitors, would very substantially exceed required community payments were the proposed wind farm land based.

Iona alone would see a loss of day visitor revenues of £800k+ with a 10% reduction.

As Scottish Power is owned by Iberdrola, though with companies like Blackrock holding substantial assets, involved then profits from industrialising Scotland's inshore waters are of little or no national benefit.

LANDSCAPE SIGNIFICANCE

Firstly, this is not an 'offshore' development but is inshore in its proximity to the coasts of Islay, Colonsay, Tiree, Mull and Iona. Hence its visual impacts can in no way be evaluated in any way alongside the large East Hornsea and Dogger Bank windfarms which are 130km plus from the coast.

The impacts of such a huge marine scheme over 500 sq.km. are immense, permanently industrialising the landscape and seascape of a very large area within Argyll's Inner Hebrides. These are remote land and sea scapes, not urban fringes or adjacent, so are treasured for their intrinsic as well as for 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.

Visual impact envelopes and impact thresholds for turbines at up to 350m in height in a largely horizontal seascape are entirely subjective, with no empirical evidence offered in the evaluations provided.

Any vertical development in a marine seascape setting of low islands and extensive distant horizons cannot be evaluated in the same manner as a land based development, as vertical elements visually in a predominantly horizontal seascape are disproportionately powerful.

(See Elements of Visual Design in the Landscape - Simon Bell)

Section 6.2.5 'Cultural Environment' wrongly comments:

'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'.

Visual impact "significance" estimates with subjectively applied magnitude thresholds are invariably set too low.

It is worth noting that the planning enquiry for the Ovenden Moor windfarm some thirty years ago in W Yorkshire cited no strong visual impacts above a 20km threshold, when the actual developed site is still prominent within the Pennine landscape at 45km distance.

As far as turbine heights are concerned, the distance to visual horizon for the Eiffel Tower is 79km, and the larger proposed turbines would be higher than that. The mobile blade movements and lighting further raise land and seascape impacts, day and night.

The proposal submission seems to demonstrate the classic strategy of a wind farm developer seeking to understate the impacts of their proposal. The assessment deliberately understates the visual impact and omits the aggregate effects of evident major industrialisation of a currently pristine seascape with large numbers of geometrically spaced turbines.

FAILURE TO COMPLY WITH ISLANDS ACT

"The Islands (Scotland) Act 2018 recognises that our islands face distinct circumstances and requires public authorities to consider the needs of island communities when exercising their functions".

Mairi Gougeon MSP

Cabinet Secretary for Rural Affairs, Land Reform and Islands

We are extremely concerned that the very short timetable for consideration of this application, which would be the largest inshore marine windfarm in the UK, within a highly sensitive land and seascape, mitigates against compliance with the 2018 Islands Act and its fundamental intention of ensuring a full voice for island communities in actions and developments that affect them.

The Thames Estuary London Array is a fifth the size of the Machair proposal at 100 sq.km, with 150m high turbines, and about 25% the output. The consultation process for that inshore wind turbine development was close to eighteen months.

We note comments made by the various island Community Councils on this particular issue. The spirit of this legislation was to empower island communities, not disempower them. We observe and recognise the lack of compliance with the Islands Act (Scotland) 2018 in this whole project proposal and 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

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for Gigha Community Council

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