

MachairWind: Iona Community Council Briefing for PPSL Committee Members

Our request to you is that Argyll and Bute Council's PPSL Committee:

- **Objects to the MachairWind applications.**
- Acknowledges that Iona, Islay and Colonsay Community Councils have each concluded that **the Environmental Impact Assessment (EIA) does not provide the evidence required for Scottish Ministers to determine these applications.** Our positions are validated by planning specialists and supported by, among others, the National Trust for Scotland and the Hebridean Whale and Dolphin Trust.
- Asks Scottish Ministers to satisfy themselves that **every statutory test has been demonstrated by evidence** before determining the applications.

Public concern is exceptional: 4,819 objections have been submitted through the public objection platform, which was open for three weeks; the public petition has almost 10,000 signatories; further representations have been submitted to MD-LOT.

Overview: the affected communities support Scotland's net zero transition. The issue Ministers must decide is whether **this proposal, in this location and at this scale**, satisfies the statutory planning and environmental framework.

MachairWind would comprise ~450km² (51 times the size of Iona) of at least 91 turbines up to 335m high – each taller than the Eiffel Tower – within 10km of Colonsay, 16km of Islay and 21 km of Iona and Mull; vs Dogger Bank, the UK's current largest wind farm, comprises 260m turbines 130-190km from land.

It would introduce major industrial infrastructure into an exceptionally sensitive, nationally and internationally significant living cultural, natural heritage and biodiverse land- and seascape. Consent would establish the area as suitable for offshore wind development in perpetuity under National Planning Framework 4, where repowering, extension and expansion are expressly supported.

Principal issues

1. Landscape, seascape and visual impact

- The applicant repeatedly identifies **major adverse, major significant and significant** landscape effects, **yet** reaches lower conclusions than those findings support.
- At the Sound of Iona, for example, the EIA accepts a high-sensitivity receptor, 39° of Atlantic horizon, large geographical extent of change, and effects on the iconic ferry crossing and Iona's setting, **yet** concludes only medium magnitude and moderate significant effect.
- **A de facto distance threshold operates across the EIA**, which is neither declared nor standard methodology, where – without exception – effects beyond ~20 km are consistently reduced. Design changes that might reduce major landscape effects on nearer islands – e.g. Colonsay – were rejected expressly because they would reduce generating capacity. Major landscape effects were therefore accepted as the consequence of the chosen design.

2. Cultural heritage

- The statutory test is whether the integrity of the setting of heritage assets is adequately retained. The EIA does not demonstrate this test has been met.
- Historic Environment Scotland advises Iona's significance lies in experiencing the whole cultural landscape: arrival by sea, pilgrimage, movement through the landscape and between monuments, and the Atlantic setting.
- The EIA selects viewpoints and directions of travel, treating heritage assets in isolation, excluding movement between them, and assuming visitors look only in particular directions. It does not undertake the assessment required of whether the integrity of setting has been adequately retained.

3. Island communities and socio-economic impacts

- The applicant identified potential impacts on island habitability but carried out **no socio-economic assessment** of any affected island community.
- The EIA relies on generic tourism studies that independent analysis shows cannot reliably predict tourism impacts in landscape-dependent island destinations where the visitor economy depends on landscape and seascape.
- No island-based research examined visitor behaviour, community resilience, long-term island sustainability or local socio-economic impacts. The EIA nevertheless concludes low tourism sensitivity, minor tourism effects and no significant effects on community resilience or long-term island sustainability.
- The planning framework requires local socio-economic benefits to be demonstrated. The EIA demonstrates none.

4. Biodiversity

- European law permits consent only where there is **no reasonable scientific doubt** that protected sites will avoid adverse effects.
- But the applicant has prepared a derogation case and compensation plans, acknowledging it has not established absence of reasonable scientific doubt.
- NPF4 Policy 4(e) requires protection of nationally and internationally important biodiversity to take priority where uncertainty remains.

5. Cross-cutting issues

- The EIA assesses negative impacts **only** for the electricity generation element of the project **yet** claims benefits for the completed project, including the transmission and grid infrastructure. NatureScot, the Marine Directorate and the Court of Session in *Raeshaw* support assessment of the whole project.
- The applicant's climate case excludes **~75%** of the project's lifecycle emissions associated with construction, maintenance and decommissioning, and **does not provide the evidence needed to demonstrate climate benefit**.

Consultation

- Community Councils' objections show that they were not meaningfully consulted during site selection by the Scottish Government in 2020.
- The applicant has had ~four years and multinational resources to prepare its application. Communities have had **seven weeks** of voluntary effort during peak tourist season, and a refused request for extended public consultation.